

GREATER COLUMBIA BEHAVIORAL HEALTH Policies and Procedures

Category: Privacy and Security
Approved On: 03/27/2003
Approved By: The Board of Directors
Revised: 00/00/00
Effective Date: 15 days from approval/ the last revision

No: PS621.00

Title: Staff Training Plan for Privacy and Security

- I. Greater Columbia Behavioral Health (GCBH) will train all members of its staff on the policies and procedures with respect to protected health information as necessary and appropriate for the members of the staff to carry out their function within the organization.

This training will:

- A. Be provided to each member of GCBH's staff and other persons employed or volunteers who are likely to have contact with protected health information.
 - B. Be provided to all new hires within 30 days of hiring; and
 - C. Be provided to each staff member whose functions are affected by a material change in the policies or procedures of GCBH, within a reasonable period of time after the material change becomes effective.
- II. GCBH will document that the training has been provided through maintenance of signed acknowledgements by all staff upon completion of any required training. This acknowledgement will include a statement that the staff member will honor all of GCBH's security and privacy policies and procedures.
- III. The training on privacy and security will include, but not be limited to, the following topics:
 - A. General awareness of privacy and security issues, including specific awareness of HIPAA regulations and requirements.

- B. GCBH policies and procedures with respect to protected health information and information security.
- C. Vulnerabilities of health information in GCBH's environment.
- D. Security responsibilities of each staff member:
 - 1. General security awareness and responsibility
 - 2. Password protection
 - 3. Virus prevention
 - 4. Data backup procedures
 - 5. Remote access
 - 6. Removal of information from GCBH
 - 7. Consumer records outside of the official medical record
 - 8. Proper authorization and consent to release procedures
 - 9. Workstation acceptable use policies and practices
 - 10. Consumer rights and responsibilities regarding protected health information and confidential records
- E. Procedures to follow in case of a suspected breach of privacy or security.
- F. Disaster plan and emergency procedures.

IV. Once this training program has been received and acknowledged by all current staff, GCBH will deploy a continuing training plan that includes the following features:

- A. Basic security awareness training as outlined above will be repeated for all staff at least once every three years after the initial training. Staff members receiving this follow-up training will complete another acknowledgement of training receipt form.
- B. At least every three months, the Administrative Assistant, in conjunction with the Privacy Office and Security Officer, will publish a privacy and/or security reminder newsletter/flyer that will be distributed to all staff via the following means:
 - 1. Email to all staff
 - 2. Posting to the GCBH website

V. Scheduled Review of this Policy:

The review of the GCBH policies and procedures manual is on a two year cycle. The GCBH policy review and revision approval process is a three month process. This policy is scheduled to be reviewed every second year:

- A. by GCBH staff by April of odd years,
- B. by the Regional Advisory Board (RAB) by May of odd years,
- C. by the GCBH Board of Directors by June of odd years, and
- D. outside of the schedule if required.

ACKNOWLEDGEMENT OF PRIVACY AND SECURITY TRAINING

I, the undersigned, have received training on security and privacy issues; policies and procedures of GCBH relating to uses and disclosures of protected health information; staff responsibilities for security and privacy; and other topics relating to security and privacy of client information. I also pledge to follow and support all GCBH policies and procedures in this regard.

I understand that my obligations outlined above will continue after my employment/contract/association/ appointment with GCBH ends.

I further understand that my obligations concerning the protection of the confidentiality of client protected health information relate to all client health information whether I acquired the information through my employment/contract/association/appointment with GCBH or within any of the healthcare facilities owned or managed by GCBH.

I also understand that unauthorized use or disclosure of such information will result in a disciplinary action up to and including termination of employment/contract/ association/appointment, the imposition of fines pursuant to relevant state and federal legislation, and a report to my professional regulatory body.

Signature of Individual

Date Signed