



<b>Pennsylvania Hospital &amp; Surgery Center</b>  <b>ADMINISTRATIVE POLICY MANUAL</b>	Page 1  Effective: 0408
<b>SUBJECT: WORKFORCE TRAINING FOR HIPAA</b>  <b>POLICY NUMBER: HIP19</b>	

Issued:

**POLICY**

Committee Approval:  
HIPAA

For purposes of this policy, Pennsylvania Hospital includes all off campus licensed facilities, including but not limited to the Surgery Center of Pennsylvania Hospital.

Administrative Policy  
Review Committee:  
April 2003  
April 2004  
April 2006  
April 2007  
April 2008

It is the policy of Pennsylvania Hospital to train all members of its workforce on the policies and procedures that it has in place with respect to the privacy of patient health and medical information as necessary and appropriate for workforce members to carry out their functions within Pennsylvania Hospital. Education should include:

Attachment(s):

- a) The responsibilities of all members of the workforce with respect to patients' health and medical information;
- b) The privacy policies and procedures of Pennsylvania Hospital applicable to all members of the workforce;
- c) The personal and ethical obligations of each member of the workforce with respect to patients' health and medical information; and
- d) The disciplinary actions and legal sanctions applicable to members of the workforce who violate the privacy policies and procedures.

Related Policies:

**SCOPE**

HIPAA privacy training is mandatory for all members of the workforce. For purposes of this policy, workforce includes employees, physicians, house staff, volunteers, trainees, and other persons whose work performance is under the direct control of Pennsylvania Hospital, whether or not they are paid by Pennsylvania Hospital.

**IMPLEMENTATION**

**Common Educational Needs:**  
The UPHS Privacy Officer is responsible for identifying and developing the content and educational programs that are common for all UPHS workforce members and large cross entity job families in order for UPHS to be compliant with UPHS HIPAA policies. The UPHS Privacy Officer and the Director of UPHS Organization Design and Competency Systems are charged with developing system-wide training programs that reflect the requisite content identified by the UPHS Privacy Officer. The UPHS Privacy Officer and the Director of UPHS Organization Design and Competency Systems are responsible for facilitating train-the-trainer sessions for each Pennsylvania Hospital training staff/management. Pennsylvania Hospital's Privacy Officer and their training staff/management are responsible for ensuring that their respective workforce members receive the training necessary and appropriate to permit the workforce members to carry out their functions within Pennsylvania Hospital. Pennsylvania Hospital's Privacy Officer is responsible for tracking completion of required workforce education utilizing KnowledgeLink.

**Department Specific & Job Specific Training Needs:**  
The Department/Accounting Unit/Cost Center Manager is responsible for identifying the content that workforce members need to learn in order to be compliant with UPHS and Pennsylvania Hospital's policies. The Department/Accounting Unit/Cost Center Manager is responsible for

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developing department-specific and job-specific training programs that reflect the requisite content identified by the Pennsylvania Hospital Privacy Officer. The Department/ Accounting Unit/Cost Center Manager is responsible for ensuring that all workforce members under their supervision receive the training necessary and appropriate to permit their workforce members to carry out their functions within Pennsylvania Hospital. The Department/Accounting Unit/Cost Center Manager is responsible for tracking completion of required workforce education utilizing KnowledgeLink.

## **PROCEDURE**

### **1. Mandatory Training and Education**

All members of the workforce are required to attend the training and education at the time of:

- Rollout of the policies and procedures;
- Material changes to the policies and procedures;
- Upon employment or placement / assignment; and
- Transfer, promotion or change in job status.

Attendance is mandatory and will be documented by attendance sheets signed by the workforce member and maintained electronically in the workforce members' educational transcript.

### **2. Timing**

Training must be provided for the existing workforce. New members of the workforce must receive the appropriate privacy training within a reasonable period of time after joining Pennsylvania Hospital, generally no later than thirty days after their hire date / assignment.

### **3. Changes in Policies and Procedures**

Workforce members may be divided for purposes of training based upon their access to PHI. Workforce members may be divided between those who are reasonably likely to encounter privacy-related issues as a part of their job performance and those who are not.

a) **Workforce Members Who Do Not Have Access to PHI:** Workforce members in this category should have received HIPAA general education prior to the effective date of the Privacy Rule of April 14, 2003.

b) **Workforce Members Who Have Access to PHI:** As necessary, workforce members requiring more specific training and education should be divided into groups according to their duties under the HIPAA regulations; e.g., those who are responsible for patient registration and scheduling, patient care, patient billing, etc. These workforce members shall be required to attend all training and education sessions addressing privacy-related issues specific to their job as mandated by their supervisor. The topics to be covered by this training and education session should include function/process specific details of the policy and procedures regarding the use and disclosure of and access to patients' health information including non-routine access issues.

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c) Subsequent training will be provided for workers whose job functions are affected by a material change in the policies and procedures required by the HIPAA privacy regulations within a reasonable period of time after the change becomes effective. General training and education "refresher" sessions may be required of all workforce members as deemed necessary by the UPHS Privacy Officer.

#### 4. Records and Documentation

The Department/Accounting Unit/Cost Center manager shall assure that training records are being kept and maintained in the Departmental Employee File and reported to the Pennsylvania Hospital Privacy Officer. The Privacy Officer will enter workforce member HIPAA training data into Knowledge Link for Pennsylvania Hospital and UPHS auditing. Such records and documentation should at least include the following information:

- The date, time and approximate duration of the session;
- The general subject matter and method of presentation; and
- Assessment data/score

/s/Kathleen Kinslow  
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 Executive Director

05/05/08  
 Date

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