	Policy Number: 5514	Applies to Product Type: <input checked="" type="checkbox"/> Medi-Cal <input checked="" type="checkbox"/> CMC	Page 1 of 2
Original Effective Date: September 2013		Revision Effective Date: May 1, 2018	
Policy Applies to: All Staff		Classification Series: 5500-5999 Regulatory Affairs	
Policy Title: Policy on Privacy Training			

Policy Statement

Community Health Group and Community Health Group Partnership Plan (collectively "CHG") information and education program will be utilized to assist each employee in understanding the HIPAA Privacy Rule and CHG's HIPAA Compliance Policy Manual. All employees will be apprised of all applicable federal laws, regulations and standards relating to the Privacy Rule and the consequences that follow any violation of CHG's policies and procedures related to the Privacy Rule.

Purpose


To ensure that all members of CHG Staff, who have access to member information understand CHG's concern for the respect of member privacy and are trained in CHG's policies and procedures regarding Protected Health Information (PHI).

Comment

1. All current staff will be required to undergo privacy training in accordance with the HIPAA Privacy Rule.
2. New employees will receive a copy of the HIPAA Compliance Policy Manual upon commencement of their employment and will be scheduled for Privacy Training in accordance with the HIPAA Privacy Rule as soon as possible, but in no event later than thirty (30) days.
3. All staff members will be required to undergo privacy training in accordance with the HIPAA Privacy Rule within a reasonable time after there is a material change to CHG's policies and procedures on privacy practices. HIPAA training shall also be included in CHG's annual compliance training.

Procedure

1. The Privacy Training will be conducted by the Compliance Officer or his or her designee.
2. All attendees will receive copies of CHG's policies and procedures regarding privacy.
3. All attendees must attend the training in person and verify attendance and agreement to adhere to CHG's policies and procedures on privacy practices.
4. Training will be conducted in the following manner: Classroom presentation by the Compliance Officer or his/her designee.
5. Topics of the training will include a complete review of CHG's policies on privacy practices and will include other information concerning the HIPAA Privacy Rule, such as, but not limited to the topic areas specified in Policy 4002:
 - a. Overview of the federal and state laws concerning member privacy including the Privacy Regulations under the Health Insurance Portability and Accountability Act of 1996 (HIPAA)
 - b. Description of protected health information (PHI)
 - c. Member rights under the HIPAA Privacy Rule
 - d. Staff member responsibilities under the Privacy Rule
 - e. Role of the Privacy Officer and reporting employee and member concerns regarding privacy issues
 - f. Importance of and benefits of privacy compliance
 - g. Consequences of failure to follow established privacy policies

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h. Use of CHG's specific privacy forms

Regulatory:

NCQA: None

Attachments: None

Department Head

Division Chief

Title: Regulatory Affairs Manager

Title: Associate Chief Executive Officer

(On behalf Elizabeth Martinez, Compliance Officer)

Signature: 

Signature: 

Date: 6-8-18

Date: 6-10-18