

4013.0.0 HIPAA TRAINING REQUIREMENTS

4013.1.0 Purpose

4013.1.1 To instruct all Department of Human Services (DHS) employees regarding the Department's obligations for training relating to Health Insurance Portability and Accountability Act (HIPAA) privacy policies and procedures.

4013.1.2 All DHS employees must be trained regarding DHS HIPAA privacy policies and procedures prior to accessing Protected Health Information (PHI). Among the many topics that may be covered during training sessions some of the most essential are as follows:

- A. Introduction to HIPAA and the privacy rule
- B. Explanation of the privacy officer's role and job responsibilities
- C. Overview of DHS privacy policies and procedures
- D. Explanation of all privacy forms utilized by DHS, including: 1) consent, 2) authorization, 3) requests for restriction on uses and disclosures of PHI, 4) requests to amend PHI, 5) accounting for disclosures, 6) complaint forms, and 7) requests to inspect and copy PHI as well as to implement access denial
- E. Explanation of who can disclose PHI
- F. Discussion of job responsibilities as they relate to PHI
- G. Explanation of the minimum necessary standard

4013.1.3 Privacy training sessions will encourage employees to ask questions regarding the policies. In addition, additional training will be offered periodically to keep employees current regarding the policies. Each training session will be documented and the records of training will be maintained.

4013.2.0 Training Actions

DHS will document the following training actions:

4013.2.1 All DHS employees must receive training on applicable policies and procedures relating to PHI as necessary and appropriate for such persons to carry out their functions within DHS.

4013.2.2 Each new employee must receive the training as described above prior to handling PHI.

4013.2.3 Each employee whose functions are affected by a material change in the policies and procedures relating to PHI, or by a change in position or job description, must receive the training as described above prior to handling PHI.

4013.2.4 Employee retraining may be given as deemed necessary by the supervisor.

4013.3.0 Procedures

4013.3.1 Supervisors are to complete Form DHS-4014, HIPAA Training, to indicate the level of PHI contact for each new employee and for each employee whose functions are affected by a material change in the policies and procedures relating to PHI or by a change in position or job description.

4013.3.2 Levels of Training: Level I – Low – No PHI Contact
 Level II – Medium – Limited PHI Contact
 Level III – High – Extensive PHI Contact

4013.3.3 Supervisors will submit one copy of the completed Form DHS-4014 to the DHS HIPAA Coordinator, Slot # S201 and one copy to Personnel.

4013.3.4 Information regarding HIPAA Training is located on DHS Gold at the following link:
http://DHSgold/HIPAATraining/hipaa_training.htm

4013.4.0 Documentation

The Department will maintain documentation recording the type of HIPAA training provided, when it was conducted and who received it. This information will be maintained for six years from the date of its creation or the date it was last in effect, whichever is latest.

4013.5.0 Originating Section/Department Contact

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Replacement Notation: This policy replaces DHS Policy 4013 dated April 14, 2003.