

**HAMILTON CENTER, INC.  
OPERATIONS MANUAL**

Section: **HIPAA PRIVACY**

Procedure No.: OP.16.22.01.00

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Procedure: **PRIVACY TRAINING  
PROCEDURE**

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## PURPOSE

To establish the requirements for training regarding Hamilton Center, Inc.(HCI)'s HIPAA Privacy policies.

## PROCEDURE

- A. HCI, through the Privacy Officer or designee established by the Privacy Officer, will direct the methods and manner in which HCI's privacy training will be accomplished.
- B. Training materials should include a test or some other opportunity to demonstrate understanding of the information presented. Training must be completed according to the standards in this policy in order for the training requirement to be satisfied.
- C. It is the responsibility of the Compliance Officer and/or Human Resources, to ensure that ALL staff receive training according to the HIPAA Privacy Policies.
- D. Training will be tracked by utilizing a system, with the assistance of the Compliance Officer and/or Human Resources. If requested, Human Resources will provide reports to the Compliance Office indicating the names of new staff.
- E. Each new employee must complete HIPAA Privacy training within 30 days after becoming an employee. The failure of an employee to complete the required training within 30 days of becoming an employee is grounds for sanctions, up to and including termination or dismissal, unless good cause for the delay can be shown.
- F. All staff must take HCI's privacy training annually.
- G. All third party support vendors or contractors are required to execute HCI's Confidentiality Agreement, and where required, the Business Associate Agreement. HCI shall maintain that Agreement for at least six (6) years.
- H. Each individual whose job functions are affected by a change HCI's Privacy Policies should receive training regarding that change within a reasonable period of time after the change becomes effective. The Privacy Officer, designee, or Human Resources will provide such training.

- I. Staff members who fail to complete the training are subject to the sanction policy. Anyone who fails to complete annual training related to updates will not be permitted to provide services for HCI.