



TRAINING OF WORKFORCE MEMBERS FOR HIPAA

Policy: DAS will comply with all training requirements of the Health Insurance Portability and Accountability Act.

Standard: To maintain compliance with Title 45 CFR Part 164.530, Administrative Requirements, Training.

Guidelines: DAS will train all members of its workforce on the policies and procedures with respect to Protected Health Information (PHI) as necessary and appropriate for the members of the workforce to carry out their function within DAS.

Procedures: Training:

DAS will provide training that meets the requirements of the following:

- To each member of the DAS workforce by no later than the compliance date for the covered entity of Clearinghouse;
- Thereafter, to each new member of the workforce within a reasonable period of time after the person joins the DAS workforce; and
- To each member of DAS's workforce whose functions are affected by a material change in the policies or procedures and within a reasonable period of time after the material change becomes effective.

DAS will document that the training has been provided, in either written or electronically format and retained for six years.

Orientation Training Content:

- **Welcome/Introduction**
- **Reminder to Sign Attendance Sheet**
- **Film Icebreaker – Introduction to HIPAA**
- **What is HIPAA**
 - **Background/Administrative Simplification**
 - **Insurability and Portability**
 - **Administrative Simplification**
 - **Protected Health Information (PHI)**
 - **DAS as a Clearinghouse (Covered Entities)**
 - **Timeline**
 - **Tax Implications**
 - **Group Health**
 - **Revenue**
 - **Electronic Health Transaction Standards and Code Sets**
 - **Standards for 10 specific Transaction Sets**
 - **DAS Impact:**
 - **835 Payment and Remittances**
 - **837I Institutional Claim**
 - **837I Professional Claim**
 - **Industry Standard Codes**
 - **Privacy and Confidentiality Standards**
 - **Limits Use of Privately Identifiable Health Information**
 - **Minimum Necessary**
 - **Protected Health Information (PHI)**
 - **Limit Access/Role Bases**
 - **Disclosure of Minimum Necessary**
 - **De-Identification**
 - **Right to Request Privacy Protection**
 - **Individual's Access**
 - **Verification Prior to Disclosure**
 - **ID Person and Authority**
 - **Verification Methods**
 - **Routine Communication**
 - **Non-Routine Disclosures**
 - **Recording of Uses and Disclosures**
 - **Exercise of Professional Judgment**

Orientation Training Content (continued):

- **Administrative Requirements**
 - **Privacy Officer**
 - **Training**
 - **Safeguards**
 - **Complaints to DAS**
 - **Sanctions**
 - **Refraining from Intimidating or Retaliatory Acts**
 - **Policies and Procedures**
 - **Business Associate Agreements**
 - **Definitions**
 - **Vendor Contracts**
 - **Agreements**
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- **Security and Electronic Signature Standards**
 - **Unique Identifiers**
 - **Penalties for Non-Compliance**

Responsible for Training:

Designee below oversees, directs, delivers, or ensures delivery of initial and privacy training and orientation to all employees, volunteers, contractors, alliances, business associates, and other appropriate third parties. The designee will also be responsible for on-going monitoring of the training to ensure compliance with the requirements.

Position Title: Privacy Officer

Designee: JoAnn Figueiredo
DAS Director, Collection Services
165 Capitol Avenue
Hartford, CT 06106-1659
Phone: (860) 713-5366
FAX: (860) 713-7478
EMAIL: JoAnn.Figueiredo@ct.gov

Immediate Supervisor: DAS Commissioner, Brenda Sisco

Policies and Procedures

DAS will implement policies and procedures with respect to Protected Health Information (PHI) that are designed to comply with the standards, implementation specifications or other requirements of the Health Insurance Portability and Accountability Act of 1996. The policies and procedures must be reasonably designed, taking into account the size of and the type of activities that relate to Protected Health Information (PHI) undertaken by DAS, to ensure such compliance.

Changes to Policies or Procedures.

DAS will change its policies and procedures as necessary and appropriate to comply with changes in the law, including the standards, requirements, and implementation specifications of the Health Insurance Portability and Accountability Act of 1996. These changes will be promptly documented and implemented, and the training necessitated will be promptly provided.
