

**FAMILY HEALTH CENTERS, INC.**

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**SUBJECT: TRAINING REQUIREMENTS – HIPAA PRIVACY**

**MANUAL: COMPLIANCE**

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POLICY

It is the policy of Family Health Centers, Inc. (FHC) that all members of FHC's work force are required to gain a sufficient understanding of the various requirements of the Health Insurance Portability and Accountability Act (HIPAA) and its components to allow them to perform their job duties and responsibilities.

PROCEDURE

1. Authority and Accountability

A training schedule for FHC will be developed by the Compliance Officer to meet the requirements described below. The Compliance Officer will maintain documentation of the following for each training session:

- 1.1 Names of members of FHC's work force who have received HIPAA privacy training.
- 1.2 The type of training, i.e. privacy, security or transactions, code sets and identifiers.
- 1.3 The dates on which such training occurs.
- 1.4 Copies of materials used in the training.

2. Initial Training Sessions

The Compliance Officer will ensure training sessions regarding policies and procedures enacted to comply with HIPAA are provided to each member of FHC's work force prior to the required compliance date.

3. Training for Employees Hired After the Initial Compliance Date

The Compliance Officer will ensure training sessions regarding policies and procedures to comply with HIPAA are provided to each member of FHC's work force hired after the initial compliance date.

4. Following any material change in policies and procedures relating to Protected Health Information (PHI), the Compliance Officer will ensure that all affected employees receive training regarding the revisions made within thirty (30) days of the effective date of the change.

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5. As deemed appropriate by the Compliance Officer, refresher training on policies and procedures governing the use of PHI will occur periodically either in separate sessions or as part of normal staff meetings.

Development Date: February 2003

Effective Date: April 14, 2003

Revised: July 2005

Reviewed: August 2018

Approved By:

  
Compliance Officer

8/28/18  
Date

  
Chief Executive Officer

8/28/18  
Date

  
Chairman, Board of Directors

8/28/18  
Date