

<b>STANDARD OPERATING PROCEDURE</b>	
<b>SUBJECT:</b>	EMS Billing
<b>TOPIC:</b>	HIPAA TRAINING POLICY
<b>Reference Number:</b>	EMS-06-004
<b>Effective Date:</b>	July 1, 2006
<b>Date Last Reviewed:</b>	
<b>Signature of Approval:</b>	Frank E. Wright, Fire & Rescue Chief

1.01 **PURPOSE:**

To establish training policies and procedures specific to HIPAA and its Privacy regulations (45 CFR Part 164.530 b) and Security regulations (45 CFR Part 164.308 a.5).

1.02 **GENERAL:**

To stay within the guidelines of the Health Insurance Portability and Accountability Act (HIPAA) of 1996 to protect healthcare information obtained. To safeguard the use of the PHI (Protected Health Information).

1.03 **RESPONSIBILITY:**

It is the responsibility of the Privacy Officer and Alternate Privacy Officer, to thoroughly train and familiarize WFRD members regarding HIPAA policies and procedures.

1.04 **POLICY:**

All members of the Winchester Fire & Rescue Department (WFRD) shall receive training on WFRD's policies and procedures with respect to HIPAA as necessary and appropriate to carry out their functions. All students and observers shall participate in appropriate department sponsored training prior to observation of Operational activities. Any member whose responsibility includes developing, conducting, or monitoring training shall be familiar with this policy and shall follow these procedures.

1.05 **PROCEDURE:**

- **Training Required**

Members are required to attend scheduled training programs. Failure of an operational member to attend required training shall result in disciplinary actions.

- **Responsibility for Training**

The Privacy Officer and Alternate Privacy Officer are responsible for training WFRD members regarding HIPAA policies and procedures including:

1. Developing standardized methods and materials to provide privacy and security training.
2. Identifying appropriate personnel and assigning responsibility for privacy awareness and training.
3. Conducting all privacy training sessions for operational members.
4. Ensuring that current policies and procedures are addressed at departmental staff meetings.
5. Ensuring that training be tailored to WFRD's policies and procedures and job functions and activities for their working environment, seminars and discussions, in station drills, in addition to traditional lectures, video presentations or interactive software programs.
6. Maintaining documentation of training.
7. Developing competency tests to evaluate training effectiveness.

- **Initial Training**

Initial HIPAA training shall be conducted within a reasonable period of time upon being designated an operational member of the Fire & Rescue Department. Initial training will consist of: HIPAA Privacy Rule concepts, City Security Awareness Training, and department policy and procedures related to HIPAA compliance.

1. Training of new uniform career personnel occurs during the first week of employment.
2. Training of new non-uniform members shall occur during the first week of employment.
3. Training of new volunteer members shall occur on a scheduled monthly training day.

- **Refresher Training**

Refresher HIPAA training shall be provided to Fire and Rescue Department members assigned within the department's health care components.

1. On an annual basis.
2. Within 90 days of a material change in WFRD's privacy policies and procedures.

3. As required by the Privacy Officer or Alternate Privacy Officer to account for in the event of a complaint/violation. Refresher training shall be provided in a delivery method as approved by the Privacy Officer.

a. Refresher training may consist of:

- HIPAA Privacy Rule concepts
  - Security Awareness concepts
  - Department Policies and Procedures
  - Compliant and/or violation mitigation requirements
- **Student (Ride-Along) Training:**  
Any individual requesting to participate as a student or observer (ride-along) shall complete the WFRD's approved training program. Evidence of training must be presented to the Privacy Officer five days prior to the ride-along for approval and completion of necessary confidentiality documentation.
  - **Documentation**  
WFRD shall maintain in written or electronic form a workforce-training log documenting workforce members' completion of privacy training. Training log records must be kept from time of employment or the date of their creation.

1.06 **REVOCATION:**

1.07 **REVISION:**

