PROCEDURE STATEMENT:
Training and education of Health Quest Systems, Inc. and its affiliates (“HQ”) Workforce on key privacy concepts, confidentiality, policies and procedures is a vital element of a comprehensive and effective Privacy Program.

Privacy training of the Workforce members on HIPAA and related regulations is an HQ requirement upon their hire and annually thereafter.

PROCEDURE:
1. All employees, volunteers, attending physician staff, contractors, and vendors of HQ are categorized according to their functional degree of access to Healthcare Information.

2. All active employees, including employed physicians, are trained annually on the policies and procedures regarding confidentiality and Health Information. All credentialed physician staff receive compliance and privacy policies upon credentialing and renewed credentialing (every two (2) years). Signed acknowledgement of receipt of such policies is maintained.

3. All sales onsite vendors receive compliance and privacy policies for review and acknowledgement upon credentialing through Vendor Credentialing Services (“VCS”).

4. All new hires shall be trained during orientation on the policies and procedures addressing personal Health Information and confidentiality. They also receive and review the HQ Code of Conduct.

5. Documentation on training and the annual review of the HIPAA regulatory requirements materials will be maintained on file for six (6) years.

6. Refreshers, remedial, departmental and other relevant training is provided as needed.

Periodic awareness reminders, information bulletins or similar mechanisms are utilized to communicate HIPAA related information to workforce members.
7. Training materials will be reviewed at least annually for updating to any new regulations or laws, and more often as needed.

All business unit leadership is responsible to ensure their workforce members complete HIPAA Privacy training and within specified timeframes.

REFERENCES:
45 CFR §164.530(b)
5.2.07 HIPAA Privacy Training Policy

POLICY HISTORY:
Supersedes: 2/13/2019
Original Implementation Date: 4/15/2003
Date Reviewed: 2/28/2020

APPROVAL:

[Signature]

Procedure Owner

[Date]

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