TITLE: HIPAA PRIVACY AND INFORMATION SECURITY TRAINING FOR COLUMBIA UNIVERSITY MEDICAL CENTER WORKFORCE MEMBERS

POLICY:
All workforce members of Columbia University Medical Center receive training including Health Insurance Portability and Accountability Act of 1996 (HIPAA) which includes Privacy and Information Security.

PURPOSE:
HIPAA requires healthcare organizations educate workforce members including information about: the access, use, management, control, disclosure, and/or release of Protected Health Information (PHI). The purpose of this Policy is to describe the HIPAA training plan for Columbia University Medical Center.

PROCEDURES:

1. General HIPAA Training

   Training about Privacy and Information Security is mandatory. All workforce members at Columbia University Medical Center must complete HIPAA training. The online training includes two modules.
   - HIPAA Privacy
   - Security Essentials

   • Workforce members shall not receive access to electronic applications that permit access to Protected Health Information (PHI) and / or Personal Identifiable Information (PII) until training is completed.

   • All new workforce members are electronically registered to complete the online Privacy and Security Essentials courses. Employees receive notification via email with the link and instructions to complete the training.

   • Completion is electronically recorded. In addition, certificates of completion may also be printed after the courses are completed.

2. RESEARCH / RASCAL

   • A workforce member who conducts research activities at Columbia University Medical Center must complete a research-specific HIPAA training course in RASCAL.

     - Completion of the HIPAA research training is required IN ADDITION to the general HIPAA training
To take the research-specific HIPAA training course, log onto http://www.rascal.columbia.edu then login to the Testing Center (under "Compliance") and select training module TC0019 (HIPAA: Health Insurance Portability and Accountability Act Training Course).

3. **Students**
   - HIPAA training for students (Medical, Nursing, Dental and Physical Therapy) is provided through the online training modules.
   - It is the responsibility of each school to assure that all students receive required HIPAA training prior to requesting access to protected health information.

4. **Refresher training upon request, remedial education and/or periodic reminders / Information Bulletins**
   - The Office of HIPAA Compliance provides training for departments, programs or staff upon request.
   - Periodic HIPAA refresher training will be offered to all staff
   - Management HIPAA Updates will be scheduled as needed
   - Periodic reminders including emails and updates at other meetings will be provided as needed.

**Questions**

Questions about HIPAA training should be directed to the individual’s supervisor or the Privacy Officer.

**Definitions**

*Protected Health Information* is information about a patient, including demographic information that may identify a patient that relates to the patient's past, present or future physical or mental health or condition, related health care services or payment for health care services.

**RESPONSIBILITY:** Privacy Officer, Departments

**ISSUED:** December 2003
**REVIEWED:** October 2007
**REVISED:** December 2009
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