

## POLICY INFORMATION

**Policy Title:** HIPAA Privacy Training Policy and Procedure

**Departmental Owner:** Chief Compliance, Audit, and Privacy Officer

**Version Effective Date:** 2/28/24

**Last Reviewed:** 2/28/24

## SCOPE

This policy applies to the following individuals and/or groups:

- All of the below categories  
 All Employees  CT Employees  NY Employees  Remote Employees  Contractors  Volunteers  Students/Interns  Vendors

This policy applies to all above listed Nuvance Health workforce members including but not limited to the following locations:

- All of the below entities
- |   |   |   |
|---|---|---|
| <input type="checkbox"/> Nuvance Health Systems                                   |   |   |
| <input type="checkbox"/> Danbury Hospital (including New Milford Hospital Campus) | <input checked="" type="checkbox"/> Health Quest Systems, Inc. "(HQSI)"   | <input type="checkbox"/> Western Connecticut Home Care, Inc ("WCHN")                                  |
| <input checked="" type="checkbox"/> Northern Dutchess Hospital                    | <input checked="" type="checkbox"/> Health Quest Home Care, Inc   | <input type="checkbox"/> Western Connecticut Health Network Physician Hospital Organization ACO, Inc. |
| <input type="checkbox"/> Norwalk Hospital   | <input checked="" type="checkbox"/> Hudson Valley Cardiovascular Practice, P.C. (aka The Heart Center) ("HVCP") | <input type="checkbox"/> Western Connecticut Home Care, Inc   |
| <input checked="" type="checkbox"/> Putnam Hospital                               | <input checked="" type="checkbox"/> Other HQSI-affiliated Entities Not Listed                                   | <input type="checkbox"/> Other WCHN-affiliated Entities Not Listed                                    |
| <input checked="" type="checkbox"/> Sharon Hospital                               |   | <input checked="" type="checkbox"/> Nuvance Health Medical Practices (NHMP PC, NHMP CT, ENYMS & HVCP) |
| <input checked="" type="checkbox"/> Vassar Brothers Medical Center                |   |   |

## POLICY STATEMENT/PURPOSE

To assure that all Nuvance Health and its affiliates ("Nuvance") Covered Individuals receive initial and ongoing education regarding the HIPAA Privacy Rule, and other applicable state and local patient privacy rules and regulations and related Nuvance Compliance policies and procedures ("Privacy Training"). Nuvance will record Covered Individual's attendance at Privacy Training sessions and will maintain these records for six (6) years.

## DEFINITIONS

See HIPAA Glossary

**Covered Individual:** This term refers to all Nuvance Health workforce members, business affiliates, and agents. Workforce members shall include any of the following individuals at Nuvance Health: Members of the Nuvance Health Board and the boards of any Nuvance Health related entity; President/Chief Executive Officer; administrators; managers, officers; employees, affiliates; medical staff members; appointees; volunteers; personnel; interns; students, trainees, and any individual whose conduct is under direct control of Nuvance Health whether or not they are paid by Nuvance Health. Business Affiliates shall include any non-workforce member, contractor, independent contractor, vendor, person, subcontractor or third-party, who or that, in acting on behalf of Nuvance Health: (i) delivers, furnishes, prescribes, directs, orders, authorizes, or otherwise provides Federal healthcare program items and services; (ii) performs billing or coding functions; (iii) contributes to Nuvance Health's entitlement to payment under Federal healthcare programs; and (iv) is affected by one or more of Nuvance Health's risk areas through the Business Affiliate's

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Revision Dates: 2/28/24

Supersedes: HQ 5.2.07 HIPAA Privacy Training Policy;  
HQ 5.2.07 HIPAA Privacy Training Procedure

interaction with, or performance of their role, functions, and responsibilities or provision of contracted services at Nuvance Health. Agents include individuals or entities that have entered into an agency relationship with Nuvance Health. Agents fall under the category of either Workforce Member or Business Affiliate depending on their role, functions, and responsibilities.

## POLICY

1. Training is an essential part of an effective Compliance Program. It is the policy of Nuvance, in compliance with 45 C.F.R. §164.530(b), to provide training to all Covered Individuals regarding their obligations under HIPAA Privacy regulations, other applicable state and local patient privacy rules and regulations, and Nuvance related policies and procedures regarding the privacy and confidentiality of PHI.
2. All Covered Individuals are required to sign an Individual Confidentiality Agreement upon hire or at the time of initiating a relationship with Nuvance.

## PROCEDURE

Training and education of Nuvance Health Covered Individuals on key privacy concepts, confidentiality, policies and procedures is a vital element of a comprehensive and effective Privacy Program.

Privacy training of the Covered Individuals on HIPAA and related regulations is an Nuvance requirement upon their hire and annually thereafter.

1. All Covered Individuals of Nuvance are categorized according to their functional degree of access to Healthcare Information.
2. All active Covered Individuals, 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 the Vendor credentialing database.
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 Nuvance 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 Covered Individuals complete HIPAA Privacy training and within specified timeframes.

## ENFORCEMENT

All individuals whose responsibilities are affected by this policy are expected to be familiar with the basic procedures and responsibilities created by this policy. Failure to comply with this policy and related procedure may result in remedial and/or disciplinary action, up to and including termination of any employment or other relationship.

## REFERENCES

HIPAA: §164.530(b)  
Personal Privacy Protection Law (Public Officers Law, Article 6-A)  
NY State DOH NYS P.L. 104-191subsection 264(c)  
Nuvance Confidentiality Statement  
Nuvance Code of Conduct

## APPROVAL

DocuSigned by:  
  
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**Signature**

2/28/2024

**Date**