

## **Training Policy**

### **1. Introduction**

- a. Clark County has adopted this Training Policy to comply with the Health Insurance Portability and Accountability Act of 1996 (“HIPAA”), the Department of Health and Human Services (“DHHS”) security and privacy regulations, the Joint Commission on Accreditation of Healthcare Organization (“JCAHO”) accreditation standards, as well as our duty to protect the confidentiality and integrity of confidential medical information as required by law, professional ethics, and accreditation requirements.
- b. All personnel of Clark County must comply with this policy. Familiarity with the policy and demonstrated competence in the requirements of the policy are an important part of every employee’s responsibilities.

### **2. Policy**

- a. HIPAA and the DHHS security and privacy regulations require training all personnel with access to individually identifiable health information. The department head, Privacy Officer, and/or Personnel department are responsible for developing, presenting, and documenting training in the following subjects:
  - 1) Principles of and need for privacy and security.
  - 2) Requirements of HIPAA and the DHHS regulations.
  - 3) Requirements of other federal and state laws regulating health information.
  - 4) Clark County’s policies and procedures regarding health information.
  - 5) Practical guidance for protecting data integrity and confidentiality, such as proper password procedure, how to guard against computer viruses, and the like.
  - 6) Procedures for reporting breaches of security and confidentiality.
- b. Clark County must have new personnel trained as soon as possible after beginning employment.
- c. Clark County must also provide periodic refresher training in the above subjects. Such training may include “lessons learned” from security and confidentiality breaches, as well as any changes in the Clark County’s policies and procedures.
- d. Data users must sign a statement certifying that Clark County has trained them, that they understand the training, particularly Clark County’s policies and procedures, that they will adhere to the requirements of relevant laws and Clark County’s policies and procedures, and that they understand that they face disciplinary action if they do not.
- e. The department head or Personnel department will retain data users’ statements of understanding and compliance for not less than six years from the date of training.

- f. Department heads must supplement the required training with any additional training necessary for the particular needs of their subordinate's duties.
- g. Clark County encourages the use of videotapes, e-learning, and other methods that do not take large numbers of data users away from their jobs for an extended period.