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HIPAA Back-to-Basics Bulletin Series
HIPAA Privacy Training

This is the fifth in a series of bulletins going “Back to Basics” on HIPAA compliance. With the recent changes to HIPAA resulting from the Omnibus Final Rule, this is a good time to reevaluate your organization’s compliance with all aspects of HIPAA.

To remain compliant with the requirements under the Health Insurance Portability and Accountability Act of 1996 (HIPAA), covered entities must provide privacy and security training to each member of their workforce. While the HIPAA training requirements are non-prescriptive and give covered entities flexibility in implementation, the U.S. Department of Health and Human Services (HHS) recommends that training be an ongoing, evolving process in response to changing organizational needs. According to the HIPAA privacy rule, “a covered entity must provide training...to each member of the covered entity’s work force whose functions are affected by a material change in the policies or procedures required... within a reasonable period of time after the material change becomes effective;” the HIPAA security rule requires “periodic reminders.”

Health care organizations may be able to reduce the administrative costs of training by devising a comprehensive HIPAA educational program. Additionally, since the rules only address minimum training requirements, health care organizations can scale and customize these programs according to operational nuances and job position uniqueness. Training is not required to be lengthy -- pamphlets and copies of policies and procedures may provide sufficient periodic reminders on security and privacy protocols. Alternatively, sign-on security reminders, company newsletters, lunchtime meetings, promotional products and email messages can help update the workforce on policy and procedure changes. We recommend that you update the training program on a regular basis so it does not become stale and it keeps employee interest.

For more information on HIPAA privacy, click [here](#) to search HHS’ Frequently Asked Questions database.

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