

Weber Family Chiropractic PC
Employee Training

(CONFIDENTIALITY)

Policy No.: 12

Issue Date: 04/14/03

Revision Date: 10/01/2013

Approvals: Dr. Scott Weber
Title: Office Manager

Title:

I. POLICY

It is the policy of Weber Family Chiropractic PC to provide training to each staff member, during new employee orientation and periodically thereafter, regarding the policies and procedures of Weber Family Chiropractic PC related to the confidentiality of patient health information, the accepted methods for using or disclosing confidential patient health information and the rights of patients to inspect/copy, correct/amend or restrict the use or disclosure of patient health information. Those members of the staff who will use or disclose patient health information as part of their regular job duties will receive more detailed training than those who do not normally use or disclose patient health information as part of their regular job duties. It is further the policy of Weber Family Chiropractic PC to familiarize staff members with the state and federal laws that relate to the confidentiality of patient health information. This Policy supersedes any previous policy on this subject.

II. PURPOSE

The purpose of this Policy is to outline the topics for training, differentiate among staff positions as to the type and extent of necessary training, provide suggested methods of training and provide a mechanism for documenting completed training.

III. SCOPE

This policy applies to the training of staff members only with respect to confidentiality issues. It does not apply to other required training within Weber Family Chiropractic PC. The term "staff member" includes all employees (clerical and clinical), volunteers, trainees, temporary personnel and all other persons who perform any functions in the offices of Weber Family Chiropractic PC, whether or not they are paid for the work. The term does not include vendors or consultants.

IV. PROCEDURES

A. Preparing a Training Program

1. All employees must receive training in the following areas related to the confidentiality of patient health information:

- a. an overview of state and federal laws that require Weber Family Chiropractic PC to maintain the confidentiality of patient health information;
- b. an overview of the ways in which Weber Family Chiropractic PC maintains the confidentiality of patient health information and general guidance as to what is expected from each staff member;
- c. an overview of the patients' rights with respect to their health information;
- d. an overview of the concepts of consent, authorization and notice;
- e. guidance as to how to handle any patient complaint related to confidentiality;
- f. guidance as to the contact person in Weber Family Chiropractic PC in the event that a staff member receives a request from a patient to exercise any right related to health information;
- g. an overview of the staff member's responsibility to make good faith reports of any perceived violations;
- h. the legal consequences of failing to maintain the confidentiality of patient health information; and
- i. the sanctions that Weber Family Chiropractic PC may use to enforce compliance with Weber Family Chiropractic PC's policies and procedures regarding patient health information.

2. Clinical staff members will receive additional training in the following areas:

- a. the details of the consent, authorization and notice policies (Policy No. 2, 3 and 4);
- b. the details of the minimum necessary standard (Policy No. 15);
- c. the details of the complaint policy (Policy No. 10);
- d. the details of the alternative communications policy (Policy No. 5);
- e. the details of the marketing practices policy (Policy No. 16); and
- f. the details of the technical and physical safeguards policy (Policy No.18).

3. Medical records personnel will receive additional training in the following areas:

- a. the details of the consent, authorization and notice policies (Policy No. 2, 3 and 4);
- b. the details of the minimum necessary standard (Policy No. 15);
- c. the details of the inspection/ copying policy (Policy No. 8);
- d. the details of the restriction on use/disclosure policy (Policy No. 6);
- e. the details of the amendment/correction policy (Policy No. 7);
- f. the details of the record retention policy (Policy No. 13);
- g. the details of the destruction of health information policy (Policy No. 17);
- h. the details of the accounting policy (Policy No. 9); and
- i. the details of the technical and physical safeguards policy (Policy No. 18).

4. Front desk personnel will receive additional training in the following areas:
 - a. the details of the consent, authorization and notice policies (Policy Nos. 2, 3, and 4);
 - b. the details regarding completion of request forms for amendment/correction, inspection/copying, restriction of use and disclosure, alternate communication means, accountings;
 - c. the details regarding completion of complaint forms; and
 - d. the details of the technical and physical safeguards policy (Policy No. 18).

5. Billing personnel will receive additional training in the following areas:
 - a. the details of consent, authorization and notice policies (Policy Nos. 2, 3, and 4);
 - b. the details of the accounting policy (Policy No. 9);
 - c. the details of the minimum necessary standard (Policy No. 15);
 - d. the details of the record retention policy (Policy No. 13);
 - e. the details of the destruction of health information policy (Policy No. 17); and
 - f. the details of the technical and physical safeguards policy (Policy No. 18).

6. Dr. Scott Weber will compile a list of all staff members based on the definition provided in Section III above and assign each staff member to one of the above categories for training.

7. Dr. Scott Weber (privacy officer) will develop a training program for each group as outlined above. The training methodologies may include in-service classes, computerized training modules, individual review of the policies and procedures or any other methodology that is reasonably calculated to inform staff members of their responsibilities related to the confidentiality of patient health information.

B. Conducting Training

1. Dr. Scott Weber (privacy officer) will develop a training schedule that will provide initial training to all staff members by April 14, 2003 and periodic training thereafter. The training will be mandatory.
2. Dr. Scott Weber (privacy officer) will provide an alternate training date for those staff members who are unable to attend the scheduled training day.
3. Dr. Scott Weber (privacy officer) will provide the above training as part of the new employee orientation program, with all training completed within thirty (30) days after hire.
4. Dr. Scott Weber (privacy officer) will require each staff member to sign the Training Sign-in Sheet (in the form attached to this Policy) when attending a training session.
5. Dr. Scott Weber (privacy officer) will retain all Training Sign-In Sheets in a notebook specifically for this purpose for a period of six (6) years from the date of the training.

6. Dr. Scott Weber (privacy officer) will place an Employee Training Log (in the form attached to this Policy) in each staff member's personnel file and will enter the name and date of the training session in each staff member's Employee Training Log.