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## **North Sound Behavioral Health Administrative Services Organization, LLC**

### **Section 2500 – Privacy: Training of the Workforce**

Authorizing Source: 45 CFR 164 (HIPAA); 42 CFR Part 2 (Part 2); RCW 70.02

Approved by: Executive Director      Date: 3/11/2025 Signature:

#### **POLICY # 2520.00**

#### **SUBJECT: TRAINING OF THE WORKFORCE**

#### **PURPOSE**

In compliance with HIPAA, Part 2, State Law and any applicable Business Associate Agreements (BAAs) and Qualified Service Organization Agreements (QSOAs) with Upstream Covered Entities, this policy sets out the requirements for Workforce training on the practices of North Sound Behavioral Health Administrative Services Organization (North Sound BH-ASO) with respect to the privacy, security and incident response/Breach notification.

Capitalized terms have specific meanings. Defined terms in this policy include Breach, Disclose or Disclosure, Individual, Protected Health Information (PHI), Use and Workforce. See Policy 2502.00: Definitions for Policies Governing Protected Health Information (PHI).

#### **POLICY**

North Sound BH-ASO will require all Workforce to be trained on its policies, procedures and practices for privacy, security and incident response/Breach notification, including appropriate Use and Disclosure of PHI, facilitating rights of Individuals and safeguarding PHI, as necessary and appropriate for Workforce to carry out their functions.

#### **PROCEDURES**

1. **Training.** North Sound ASO shall provide or arrange for training for its Workforce as necessary and appropriate to carry out their functions and to comply with HIPAA, Part 2, State Law and applicable BAAs with Upstream Covered Entities.
2. **Timing of Training.**
  - 2.1. **Orientation.** As a part of its orientation process or within a reasonable time after the Workforce member is hired or otherwise begins providing services to North Sound BH-ASO, North Sound BH-ASO through its Privacy Officer and Security Officer will train Workforce members (including full- and part-time employees, interns and volunteers) in North Sound BH-ASO's privacy, security and incident response/Breach notification policies, procedures and practices.
  - 2.2. **Changes to Privacy Practices.** Whenever there are material changes to North Sound BH-ASO's privacy policies, procedures and practices, the Privacy Officer will determine the Workforce members affected by the changes and coordinate the training of those Workforce members.

- 2.3. **Changes in Functions.** The Privacy Officer will determine and coordinate training for Workforce members whose job functions change in a manner that requires additional training.
- 2.4. **Periodic Updates.** North Sound BH-ASO will provide or arrange for refresher training on an approximately annual basis. North Sound BH-ASO, from time to time, will provide or arrange for awareness training and reminder training.
3. **Targeted Training.** North Sound BH-ASO will train Workforce in accordance with their role at North Sound BH-ASO and their functions with regard to PHI.
4. **Failure to Successfully Complete Training.** Workforce members who fail to fulfill their training obligations will be subject to disciplinary action, up to and including termination of their relationship with North Sound BH-ASO, in accordance with North Sound BH-ASO's disciplinary processes.
5. **Documentation.** All trainings will be documented as to content and attendance. Documentation shall be retained for at least six (6) years for the time that the document last was in effect. Document retention requirements include:
  - 5.1 **Policies and procedures for Workforce training.**
  - 5.2 **Evidence that trainings were developed and presented to the Workforce.**
  - 5.3 **Attendance, dates and topics of training.**
6. **Related Policies.** All North Sound BH-ASO's privacy, security and incident response/Breach notification policies, procedures and practices are related to this policy.

## **ATTACHMENTS**

None