

1.0 Purpose

1.1 Security Awareness and Training: The purpose of this document is to outline the training plan and scope of the awareness and training program as required by the HIPAA Security Standard: *164.308 (a)(5)(i) Security Awareness and Training*: Implement a security awareness and training program for all members of the UCSF workforce (including management). The HIPAA Privacy Rule training and education model will be utilized for security training as well. Awareness and training procedures in this document include:

- **Initial Workforce Training Strategies:**
Implement procedures for the initial training of the UCSF workforce prior to April 21, 2005 as well as for all new employees after April 21, 2005.
- **On-going security awareness and training:**
Implement procedures to ensure employees receive security training and procedures for periodic security updates.

2.0 Definitions

2.1 Protected Health Information (PHI): PHI is an individual's health information or data collected from an individual that is created or received or received by a health care provider, plan or clearinghouse related to the past, present or future physical or mental health condition of an individual, the provision of health care to the individual, or the past, present or future payment for the provision of health care to the individual; identifies or could reasonably identify the individual; and is transmitted or maintained in electronic or any other form or medium. Note: This excludes the individually identifiable health information in education records covered by the Family Educational Rights and Privacy Act, records described at 20 U.S.C. 1232g(a)(4)(B)(iv) of the Social Security Act, and employment records held by a covered entity in its role as employer.

- 2.2 Security or Security measures:** Encompasses the entire administrative, physical, and technical safeguard in an information system.
- 2.3 Use:** With respect to individually identifiable health information, the sharing, employment, application, utilization, examination, or analysis of such information within an entity that maintains such information.
- 2.4 Workforce:** All faculty, staff, students, trainees, volunteers, and business associate who access restricted or confidential information during the course of their duties.
- 2.5 Workstation:** An electronic computing device, for example, a laptop or desktop computer, or any other device that performs similar functions and electronic media stored in its immediate environment.

3.0 Procedures & Responsibilities

3.1 Workforce Security Awareness Training for all Members of the UCSF Workforce

- 3.1.1** Security awareness training will be developed by the Information Security Officer and implemented by the HIPAA HR and Education committee before April 21, 2005.
- 3.1.2** Security awareness training will be provided to each member of the workforce by no later than April 21, 2005.
- 3.1.3** Presentations to Manager's across the UCSF enterprise will be conducted prior to April 21, 2005.
- 3.1.4** Departments will document completion of workforce training.

3.2 On-going Security Awareness and Training and Security Updates

- 3.2.1** Security awareness training will be

incorporated into the new employee orientation process by April 21, 2005.

3.2.2 Departments will conduct staff training whenever they are notified of significant changes to procedures and policies.

3.2.3 The Information Security Officer and/or the Privacy Officer will keep the following apprised of Security Training activities:

- Core HIPAA Committee
- HIPAA Steering Committee
- Executive Medical Board
- General Advisory Council
- Executive Management for the UCSF Enterprise.
- The Office of the President and the Board of Regents as may be required for annual compliance reporting to the University's governing body.
- IT Governance Committee

4.0 Initiation and Control Reporting

5.0 Records & Documentation Control

The School of Nursing maintains an automated database of training compliance. After completion of training, the user is prompted to register their training. This process generates a record of training.

6.0 Related Documents

Document Name	Procedure No.
HIPAA Security Rule: Security Awareness and Training	164.308(a)(5) http://www.ucsf.edu/hipaa/dpt_compliance/
University of California Business and Finance Bulletin IS-3 Electronic Information Security	BFB IS-3 http://www.ucsf.edu/hipaa/dpt_compliance/ or http://www.ucop.edu/ucophone/policies/bfb/is3.pdf
Information Security and Confidentiality Policy (UCSF Campus)	650-16 http://www.ucsf.edu/hipaa/dpt_compliance/
Information Security and Confidentiality Policy (UCSF Medical Center)	5.01.04 http://www.ucsf.edu/hipaa/dpt_compliance/

REVISION RECORD

Rev.	Date	Originated by:	Description of Change
A	01/07/05	Carl Tianen and Deborah Yano-Fong	Initial Release
B	03/28/05	Barbara Heredia	Version 7 corrected procedure number from 60.006 to 60.004 and minor updates to section 6.0.
C	03/29/05	Vicky Kirby-Martin and Barbara Heredia	Version 8: Title revised to include the word "Guidelines"; and revised sections 2.0 Definitions, 3.1.1, 3.1.2, and 3.2.1
D	12/14/06	Rob Slaughter	Adapted for School of Nursing

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