POLICY INFORMATION

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<tr>
<th>Document #</th>
<th>Title: Security and Awareness Training</th>
<th>Original Effective Date: 9/13/2016</th>
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Safeguard: Administrative

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<th>Approved by: Dean Beth E. Foley</th>
<th>Date Reviewed: 10/13/2017 09/30/19</th>
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I. POLICY STATEMENT

It is the policy of CEHS to establish and maintain a HIPAA Privacy & Security Training program for all members of its workforce who have access to PHI and/or ePHI during the course of performing their job duties.

II. DEFINITIONS

See HIPAA Privacy Policy 100

III. AUTHORITY AND RESPONSIBILITIES

CEHS has component units that are listed as a hybrid entity in accordance with USU’s HIPAA Hybrid Covered Entity Declaration. Only the Health Care Component/HCC (i.e., covered functions) of CEHS must comply with this policy. All references in this policy to “CEHS” shall be construed to refer only to the health care component of CEHS.

IV. PROCEDURES TO IMPLEMENT

HIPAA Privacy and Security Training Program

CEHS Compliance Officer is responsible for overseeing the development, implementation, and regular review a formal, documented program for providing appropriate privacy and security training and awareness to its workforce members. All HCC workforce members will be provided with sufficient training and supporting reference materials to enable them to appropriately protect PHI and ePHI held by CEHS and on CEHS information systems.

CEHS Workforce members are responsible for abiding by training requirements

1. All new CEHS HCC workforce members will receive appropriate HIPAA and other applicable training(s) within 30 days of hire and before being provided with access or accounts on CEHS information systems.
2. Existing workforce members will complete training at a minimum, once a year and regular updates.
3. Yearly, workforce members will sign and submit confidentiality and attestation forms to the Compliance Officer.
4. Regular security reminders will be sent out to workforce by the Compliance and CEHS IT department to keep workforce members aware of current security issues.
Documentation of Security Training:

1. CEHS Compliance Officer will document training completion and attendance.
2. CEHS will retain documentation of training for six years for the date the documentation was created or the last effective date of the policy, including without limitation:
   a. Training session date and attendance list.
   b. Learning Management System training completion reports.
   c. All training materials used for the training.

V. ATTACHMENTS

N/A

VI. REFERENCES

45 CFR 164.308(a)(5)(i-ii)