
PURPOSE

The Michigan Department of Health and Human Services (MDHHS) is responsible to provide the department's privacy policy and procedure training, regarding the proper use and disclosure of protected health information (PHI), to all members of its workforce. This procedure describes the process for initial training.

PROCEDURE***Bureau of Legal Affairs' Staff***

1. Develops training plan in collaboration with the MDHHS privacy strategic group and the hospitals privacy group.
2. Develops or oversees the development of training materials, including instructions for conducting training sessions and testing materials. The training material shall be maintained for six years.
3. Provides training for current workforce. This is accomplished through trained staff that conduct sessions with groups of employees.
4. Completes training by April 14, 2003, or as soon thereafter as possible, based on available resources.
5. Ensures documentation of initial training completion and maintains documentation in the HIPAA Privacy Office.
6. Retains original training documentation for six years.

Management - Supervisory Staff, Other Confidentiality Laws

In MDHHS areas that are impacted by state or federal confidentiality laws that are more restrictive than HIPM (for example, mental health, substance abuse, HIV/AIDS-STDs, Medicaid), area supervisors are responsible to provide confidentiality training to employees that is specific to the additional restrictions established in those laws.

REFERENCE

45 CFR §164.530(b).

CONTACT

For additional information concerning this procedure, contact the MDHHS Bureau of Legal Affairs.