**Statewide Health Information Policy Manual (SHIPM) 4.1.2 – Privacy Training**

*Compliance Review Tool Question #80*

## Artifact Must Haves and Best Practices

| **Item #** | **Topic** | **Covered (Y or N)** | **Comment** |
| --- | --- | --- | --- |
| 1 | Did the organization submit artifact(s) regarding workforce Privacy Training? |  |  |
| 2 | Does the artifact(s) document that training is provided to each new workforce member within 30 days after the person joins the workforce and prior to accessing health information?  |  |  |
| 3 | Does the artifact(s) indicate that workforce members are trained in Privacy P&Ps at least annually? |  |  |
| 4 | With regards to the training content: | n/a |  |
| 4a | * Is the training content role-based – general workforce versus specific role/function?
 |  |  |
| 4b | * Does the training provide references to the organization’s P&P?
 |  |  |
| 4c | * Does the training establish rules of conduct and instruct each workforce member about the rules and procedures concerning the privacy of individuals’ information?
 |  |  |
| 5 | Are training materials reviewed at least annually? |  |  |
| 6 | Is training updated and provided within a reasonable period of time after a material change in the policies and procedures becomes effective?  |  |  |
| 7 | Is training documented in writing, which may be an electronic training record, and include which workforce members were trained, topics covered, and training dates? |  |  |
| 8 | Does the training tracking documentation and/or training logs (*tracking of workforce by individual*), at a minimum, include the following: | n/a |  |
| 8a | * Date of training?
 |  |  |
| 8b | * Name of individual?
 |  |  |
| 8c | * Course name?
 |  |  |
| 9 | Does the artifact(s) have official review/acceptance: | n/a |  |
| 9a | * Effective Date?
 |  |  |
| 9b | * Revision Date?
 |  |  |
| 9c | * Document the authorizing (senior or executive) management approval?
 |  |  |

Title(s) of Submitted Policy/Document/Artifact(s) Reviewed:

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Stored Location of, or link to Artifact(s) Reviewed: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

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Overall CDII Reviewer Comments (*optional*):

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Name of CDII Reviewer: \_\_\_\_\_\_\_\_\_\_\_\_\_\_ Date Reviewed: \_\_\_\_\_\_\_\_\_\_\_\_

Title of or link to Other Source(s) used (e.g., sources not in checklist, templates):

CalHHS/OCR provides [training materials](https://www.hhs.gov/hipaa/for-professionals/training/index.html) to assist with the implementation of privacy/security training, the materials can be found at the following link:

http://www.hhs.gov/ocr/privacy/hipaa/understanding/training