



**Policy and Procedure: HIPAA/HITECH Compliance**  
**Topic: Workforce Training**

**HIPAA Regulation:**

- *Training* § 164.530 (b)(1)

**Policy Purpose:**

The purpose of this policy is to ensure that the workforce receives the necessary training to comply with **Saratoga Bridges** HIPAA Privacy Policies and Procedures and to prevent any violations of the HIPAA Privacy Rule.

As it relates to this policy, workforce means employees, volunteers, trainees, and other persons whose conduct, in the performance of work for **Saratoga Bridges**, is under the direct control of **Saratoga Bridges**, whether or not they are paid by **Saratoga Bridges**.

**Policy Description:**

It is the policy of **Saratoga Bridges** that HIPAA privacy training will be provided to all members of the workforce within a reasonable period of time after the person joins Saratoga Bridges workforce.

It is the policy of **Saratoga Bridges** that HIPAA privacy training will be provided to each member of Saratoga Bridges workforce whose functions are affected by a material change in the policies or procedures required by the Privacy Rule, within a reasonable period of time after the material change becomes effective.

**Policy Responsibilities:**

1. The Privacy Officer is responsible for the development and implementation of privacy training courses.
2. Human Resources will be responsible for administering the training program.
3. The workforce training must include training in privacy policies and procedures relating to privacy as implemented by Saratoga Bridges.
4. The training must be completed within a reasonable period of time after the person joins Saratoga Bridges workforce, but not more than 90 days after joining the workforce.
5. For existing members of the workforce whose functions are affected by a material change in the policies and procedures, training must be completed within 90 days of the material change.