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Date Adopted: 02/01/18		Date(s) Revised: 02/04/2025 Date(s) Reviewed: 09/29/2020				
President $\frac{02/4/25}{\text{Date}}$						

#### **POLICY STATEMENT**

All personnel will follow an established process concerning yearly security awareness and training.

## **SCOPE**

All personnel.

### **DEFINITIONS**

<u>Personnel:</u> Includes, but is not limited to, all employees, medical and clinical staff, business associates, allied health professional staff or students, vendors, volunteers, excluding patients and visitors.

<u>PHI:</u> Individually identifiable health information, including patient demographics, that is created or received by a provider and identifies the person and relates to his or her past, present, or future physical or mental health, treatment, and/or payment, except for information relating to persons who have been deceased for more than fifty (50) years.

<u>Sensitive Information</u>: Data that is proprietary to NUHS and is not intended to be disclosed to the general public.

# **REGULATORY REFERENCE**

45 C.F.R. 163.308(a)(5)(i).

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## **PROCEDURE**

- Security awareness is vital to the protection of PHI and Sensitive Information.
  All personnel are required to maintain a working knowledge of general security best practices for the protection of PHI and Sensitive Data.
- Upon hire or commencement of work, all personnel that interact in any way with PHI or Sensitive Information shall receive training from the HIPAA Security Officer or his designee concerning privacy and security best practices and HIPAA.
- Training regarding privacy and security best practices and HIPAA shall be available to all personnel and shall be provided on a yearly basis. The duration of the training shall be at least one hour. The topics for the training shall be selected by the Human Resources based on vulnerabilities identified or highlighted in the prior year.

## POLICY RESPONSIBILITY

HIPAA Security Officer and Human Resources

## **REVISION**

NUHS reserves the right to unilaterally revise, modify, review or alter the terms and conditions of the policy within the constraints of law, with or without reasonable notice.