

VCU Affiliated Covered Entity
HIPAA Security Rule Operational Policy

SUBJECT:	POLICY NO.:	ACE-0007
	APPROVED DATE	10/19/2005
Security Awareness and Training	EFFECTIVE DATE:	11/19/2005
SR-308a5i	REVIEWED DATE:	
	SUPERSEDES NO.:	NEW

I. PURPOSE:

To assure that the Workforce of the ACE is properly trained and aware of the intent and scope of the HIPAA Security Regulation and of the organization's policies and procedures in place to meet its intent.

II. POLICY:

A. All members of the Workforce are expected to be familiar with the HIPAA Security Regulation and with the ACE (ACE) policies and procedures describing their responsibilities for assuring that they remain in compliance and that the Electronic Protected Health Information remains secured.

B. The ACE will support this policy by:

1. Establishing and implementing a Workforce Security Awareness and Training Program, incorporating the Security Rule. The goal of the awareness and training program is to support the competency development of the Workforce members who are authorized Access to Information Systems in the performance of their duties, relative to the Security of Electronic Protected Health Information that is created, received, maintained, and transmitted.
2. Implementing a structured Security Awareness and Training Program, which incorporates policies, procedures, methods, practices, and processes designed to provide members of the Workforce with:
 - a) Orientation on Security responsibilities through initial job training and information.
 - b) Ongoing education, including in-services, training bulletins, and other activities designed to maintain or improve job competency in information Security practices.
 - c) A means to assess Workforce competency in job performance, based on assigned roles relating to the care and custody of Electronic Protected Health Information.

III. DEFINITIONS: See document "SECURITY POLICY GLOSSARY FOR DEFINITIONS OF SPECIAL TERMS (ACE-0999)".

IV. PROCEDURES:

A. Standards:

1. The policies and procedures of the ACE relating to Information Security apply to all component organizations of the ACE and all members of the Workforce.
2. All computing resources shall be assigned a Resource Owner who is responsible for the Integrity, Confidentiality, and Security of the resource.

B. Responsibilities:

1. Supervisors and Managers of the Workforce shall review the applicable ACE Policies and Procedures with their group members and relate these directly to the job duties performed by each Workforce member. Supervisors and Managers will assess initial competency of the Workforce member's related to understanding and application of the policies and procedures during orientation and monitor on-going demonstration of competency through performance of duties.

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- 2. The Human Resources offices of each component organization of the ACE shall include the objectives of the organization's HIPAA Security Rule and the policies as part of the Workforce orientation process.
- 3. The Compliance Office shall have responsibility for publishing ongoing updates and reminders to the Workforce related to Information Security policies and objectives.
- 4. The Compliance Office in collaboration with the appropriate Human Resource departments will periodically review and revise training programs and/or orientation materials as deemed appropriate to support performance improvement initiatives and ensure that information provided is accurate and relevant.

V. RESOURCES

- A. Compliance Office
- B. ACE Security Official (804) 828-1990
- C. Information Security Contacts
- D. Human Resources - Training

VI. REFERENCES:

- A. HIPAA: 45 C.F.R. §164.308(a)(5)(i).
- B. VCUHS - Glossary of HIPAA Terms
- C. VCUHS Compliance Manual
- D. Implementation Directive - Policy ACE-0002

APPROVED:

Signature on File

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