

**County Of San Diego**  
**Health and Human Services Agency (HHS)**

**Chapter: Health Insurance Portability and Accountability Act of 1996 (HIPAA)**  
**Key Words: privacy, copy, fees**

---

SUBJECT: **Privacy Training**

NO: **HHS- L-22**

PAGE: 1 of 2

DATE: November 7, 2007

REFERENCE: Federal Privacy Regulations, 45 C.F.R. Subtitle A, Subchapter C, Parts 164.308 (a)(5)(1) and 164.560 (b)(1).

---

**PURPOSE:**

To outline the requirements for privacy training including content, training intervals, and the duration between hire date and initial privacy training.

**BACKGROUND:**

County agencies designated as "healthcare components" under the federal Health Insurance Portability and Accountability Act of 1996 (HIPAA) must comply with privacy and security regulations which mandate workforce training. While HIPAA only applies to covered components, many of the programs and activities within the Health and Human Services Agency (Agency) have other legal mandates to protect information. In order to bridge the gap between HIPAA and other mandates, and to provide uniform training that focuses on protections for sensitive information, the Agency has developed a single Privacy Training that meets all of the mandates.

**DEFINITIONS:**

*Access* is either the physical or electronic right to use information.

*Privacy* is defined as the ability of individuals to keep their lives and personal affairs out of public view, or to control the flow of information about themselves.

*Workforce* means employees, volunteers, trainees, and other persons whose conduct, in the performance of work for the County, is under the direct control of the County, whether or not they are paid by the County.

**POLICY:**

The County will train all new members of the workforce within thirty (30) calendar days of their hire date.

*Note:* Program managers or supervisors may require a shorter duration, however the maximum duration remains thirty (30) calendar days.

Workforce members will repeat privacy training every three (3) years according to either the hire date of the workforce member or their last completion of privacy training.

Content of privacy training will be based on the current HHS HIPAA Policies.

**County Of San Diego**  
**Health and Human Services Agency (HHSa)**

**Chapter: Health Insurance Portability and Accountability Act of 1996 (HIPAA)**

---

**SUBJECT: Privacy Training**

**NO: HHSa-L-22**  
**PAGE: 2 of 2**  
**DATE: November 7, 2007**

---

Contractors on site who are not members of the workforce, but who access County sensitive information, will be trained using the "County Expectations" document in place of the regular employee training. The County Expectations document will be provided by the Privacy Officer.

*Note:* The County Expectations document is not to be used as a substitute for the regular privacy training. However the County Expectations document may be used as an outline of expectations when the workforce member is delayed in attaining electronic access rights to the County information system and must have access, or use of, sensitive information to fulfill their job duties immediately.

**PROCEDURES:**

During department or program orientation, direct supervisors will inform new members of the workforce of the required HHSa Privacy training. The new workforce member will be shown the location of the Privacy training on the Training and Development (T&D) web site.

T&D will electronically track participation and provide reports.

The Privacy Officer will follow up on workforce members who fail to meet the thirty day deadline. Physical and electronic access privileges to sensitive information may be revoked on the Privacy Officer's recommendation for failure to meet the thirty day time limit.

Workforce members who do not have, and will not have, electronic access to the County Intranet but who will have access to sensitive information in other media must be provided a physical copy of the training prior to their viewing of County sensitive information.

Contractor staff, who must complete the County Expectations training, will be provided the training prior to their accessing County sensitive information. The Acknowledgement form attached to the County Expectations document will be maintained by the program manager as part of contract or MOU documentation. Contractor staff cannot use the Agency T&D training as a substitute.

**QUESTIONS/INFORMATION:** County Privacy Officer 619-515-4243

**SUNSET DATE:** This policy will be reviewed for continuance by November 7, 2010.

Approved:



Jean M. Shepard, Director  
Health and Human Services Agency