

## L – 22: Privacy and Security Training, Statement, and Certification

**POLICY:** See L-22 Training, Statement, and Certification Policy at [www.cosdcompliance.org](http://www.cosdcompliance.org).

**DEFINITIONS:** See HHS Policy L-30.

**PROCEDURES:**

- A. HHS Programs granting access to Protected Information shall ensure all staff complete annual privacy and security training. The training shall be provided by or approved by the Agency Compliance Office (ACO).
- B. HHS Programs granting access to Protected Information that is covered under an applicable State Agreement shall ensure:
  1. Staff sign a Confidentiality **Statement** prior to receiving access to any Protected Information. Program shall only use a confidentiality statement approved by the Agency Compliance Office.
  2. Staff completes privacy and security **Training** within thirty (30) calendar days of staff receiving access to Protected Information. Program shall ensure all such Training is provided by or approved by the ACO.
  3. Staff's **Certification** of training, as follows:
    - a. Program shall ensure privacy training certification is appropriately logged in the Learning Management System (LMS); or
    - b. Supervisor shall maintain a copy of the sign-in sheet with the staff's signature to serve as staff certification.
  4. The above Confidentiality Statement, Training, and Certification are renewed at least annually, or more often as emerging privacy matters become evident or as the staff's job duties change.
  5. Copies of the signed Statement and Certification are maintained in compliance with applicable State Agreements, currently six (6) years.

**QUESTIONS/INFORMATION:** HHS Privacy Officer at 619-338-2808