HIPAA POLICIES AND PROCEDURES

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| **Policy Title:**  Security Awareness and Training Policy  **ID:** SecurityAwarenessTraining**07192015**  **rev: 0.8** | | **Approval Date:**  00/00/0000  **Effective Date:** 00/00/0000  **Revisited date:** 00/00/0000 |
| **Subject:** The policy for the security and training framework for this covered entity. | | |
| **Primary Responsible Departments and/or BAA:**   Security / Compliance | | **Review Frequency:**  **Last Review:** 00/00/0000  **Next Review:** 00/00/0000 |
| **Secondary Responsible Departments and/or BAA:**  Administration | |

**Scope:** Workforce

**Purpose:**  
To comply with all applicable laws, regulations and our own policies this policy covers the framework for security awareness training..

**Authoritative Reference:**

45 CFR §164.308 (a) 5

**Policy Definitions:**

1. **Security Reminders** – We must establish a method for periodic security updates and process review. This process is initially controlled by the Chief Compliance Officer.
2. **Protection from Malicious Software** – This CE must develop and implement procedures for detection of and protection from all reasonably foreseeable and administratively addressable risks from malicious information (e.g. viruses, (spear)phishing emails, unauthorized login attempts) that attempts to interact with information resources under the control of this CE. EPHI housed on Google under this BAA has extensive and advanced detection, isolation and monitoring tools to ensure the data integrity remains uncompromised. This process is initially controlled by the Chief Compliance Officer.
3. **Log-in Monitoring** – We must monitor and record all access to EPHI using a Unique User Identifier (UUID) that cannot be tampered with. This log-in monitoring function is provided for all Google accounts under the Google BAA.
4. **Password Management** – We must implement procedures for creating, changing, and safeguarding passwords and these must comply with our Access Control Policy (sec. (a)2).

**Related Documents:**

**Administrative:**

HIPAA Security Management Root Process

HIPAA Assigned Security Responsibility  
HIPAA Workforce Security

HIPAA Information Access Management

HIPAA Security Awareness and Training

HIPAA Security Incident Procedures

HIPAA Contingency Plan

HIPAA Evaluation

**Physical:**

HIPAA Device and Media Control Policy

HIPAA Facility Access Control Policy

**Technical:**

HIPAA Access Control Policy

HIPAA Audit Policy

HIPAA Authentication Policy

HIPAA Workstation Use Policy

HIPAA Workstation Security Policy

HIPAA Information Integrity Policy

HIPAA Transmission Security Policy

**BAA’s and Other Agreements:**

HIPAA Business Associate and Other Agreement Policy  
Google BAA