

These instructions will provide managers with the information they need to train non-employees on the Privacy policies and procedures. If you have any questions regarding the Paper or Computer Privacy training, please contact privacy@saintlukeskc.org or 816-932-6282.

Please have the person's name, entity, department, and job title available when calling.

This paper training is for non-employees only. All newly hired employees will be required to complete training using the SLHS Education application (HealthStream) within 30 days of hire.

Step 1

Determine eligibility to do paper training

A paper version of the privacy training is available on **I:/Privacy** for the following individuals:

- Non-employees such as students or contract/agency personnel who will have patient contact and/or access to paper or electronic personal health information (PHI) when performing as part of the SLHS work force.
- Those that are observing or shadowing only with no patient contact or access to electronic or paper PHI are NOT required to complete paper training. *Please see ECPS-224 Confidentiality.*
- Volunteers will be trained by the entity Volunteer office using material that is customized for them.
- Employees with unusual circumstances, under the approval of the System Privacy Officer.

Step 2

Provide person with appropriate paper materials to complete training

- The materials for the paper training can be found on the **I: drive/Privacy/Paper Training folder**.
- Combined in one document are 2 items:
 - Training materials, questions, and answer choices
 - Answer Sheet, on last page
- Non-employees* are to complete the test by recording their answers on to the answer sheet. Once the answers are recorded, they may then compare their answers to the Answer Key. Corrected answers should be recorded on the answer sheet.
- Once all answers have been recorded, the employee is then to sign their answer sheet and turn into their manager.
- Managers/or designee should answer any questions that the person may have and sign off on the answer sheet.
- Managers or entity designee should file the answer sheet for future reference.

Step 3

Retention/Tracking of Training documents

- Once the non-employee and manager have signed off on the answer sheet, it must be kept for no less than six years according to the HIPAA retention regulations. This may be done by the managers of the non-employee or by a designated person at your entity, such as the Operations Admin, Staff Development, etc.
- Coordinator/designee – enter tracking data and retain via Spreadsheet or other tracking tool.

**Credentialed Providers (non-employees) complete the HealthStream training deck and attestation of completion only, tracked via the Credentialing office.*