

**Q&A FROM
2002 SEP HIPAA PRIVACY AWARENESS AND TRAINING CONFERENCE**

HIPAA Training Tool and Training Subjects

Q: If the short term training solution is the website, what's the long term?

A: The HIPAA Training Tool will always be a link off the TMA HIPAA website and can be accessed at www.hipaatraining.tricare.osd.mil.

Q: What is the proof that my employees actually completed the training?

A: The proof of the completed training will be documented in the Learning Management System (SMS). We have also requested the trainee print out the last screen, date and sign it, and send it to the Privacy Officer.

Q: Is there foreign language access?

A: No. This is a COTS tool and will only be available in English. We suggest you use foreign language speaking employees to interpret in a classroom setting to those persons who do not have a clear understanding of English.

Q: Do my foreign language cafeteria workers need the training? What about on-site contract workers? Laundry is outsourced but they work in our facility - do they get HIPAA training?

A: Yes. Foreign language cafeteria workers or any support person, regardless of language skills, need to complete HIPAA Awareness 101 training. You can do this training in the classroom setting with an interpreter if needed.

Q: What is the estimated time to complete the HIPAA 101 level course?

A: Approximately 30 minutes.

Q: Can you log off in the middle and go back to it?

A: Yes, the LMS will track where you are located in the training.

Q: Is this a one-time training?

A: No. Annual refresher training will be required. The LMS will schedule an individual's refresher training course on the anniversary of their completion of previous training.

Q: How will transfer of employees be handled with respect to HIPAA compliance? Will the PO be responsible for this? How do I know if someone coming into my MTF has had HIPAA training?

A: The LMS will be accessible at a person's next assignment and will indicate what training has been completed. We recommend that HIPAA training be a part of the employees' training

records and when they transfer, the training records will transfer with them and will reflect the current training status.

Q: Because we're presenting to a large military audience, will it come across in the training that the UCMJ will be part of the repercussions of violating HIPAA?

A: No. The specific reference to the UCMJ has not been incorporated at this time but may be later. This needs to be addressed in you own briefs to your staff to introduce this initiative as well as the disciplinary guidance of the Office of Civilian Personnel Management for our civilian employees.

Q: To better ensure trainee understanding, why not require a minimum number of correct answers in order to receive a "certificate of training."

A: The training tool is a Commercial Off the Shelf (COTS) product. It is not currently configured to give an end-of-lesson test. We will review this issue when we configure the refresher training later in the year.

Q: Do Red Cross people have to be trained too? Does contract staff need to be trained?

A: Yes. Anyone working within your facility must receive the HIPAA privacy awareness training.

Q: How will you know who has to be trained in the MTF?

A: The Privacy Officer is responsible for tracking HIPAA training. The LMS is designed to help track the training and will be the resource the Privacy Officer will use when it is implemented.

Q: Will the Privacy Officer be able to see all the training modules to include all the 200 level courses?

A: Yes, the Privacy Officer will be able to view all courses.

Q: Is the 101 level course a prerequisite for the 200 level courses?

A: Yes.

Q: How many simultaneous logons will the system support?

A: The production system will have enough to support the MHS requirement.

Q: How do you know if the folks in your MTF have not registered?

A: The LMS will be able to tell you who has registered and taken courses. The privacy officer or his/her designee must compare the LMS registered workforce members against an MTF personnel roster to determine who has not registered and taken the training.

Q: Some people have had HIPAA training (i.e., contractors); do we still need to train these folks?

A: Yes. All new employees must be trained to the MTF's policies and procedures. This includes the HIPAA training.

Q: Will you take suggestions on modification of training?

A: We are always looking at ways to improve our training.

Q: I am confused on the various training courses that have been discussed: a) HIPAA 101, b) 200 Level.

A: The 101 level course is a HIPAA Privacy Awareness Course that everyone in the MTF must take. The 200 level courses are designed for job specific personnel to help them better understand how HIPAA will be implemented for their positions.