ADMINISTRATIVE POLICY

Subject: **Information Security**	Page **1 of 2**	Policy # **Version: 1.0**
Title: **Security Training Policy**	Revision of: **New policy**	Effective Date: **11/15/17**
		Removal Date:

I. PURPOSE

This policy and procedure establishes the required security privacy training and awareness to ensure the appropriate handling and securing of electronic Protected Health Information (ePHI) in possession of the Feinberg School of Medicine (FSM) and as required by the HIPAA Privacy and Security Rule.

II. PERSONS AFFECTED:

All NU FSM faculty, staff and students. Persons will be identified using the authorized personnel list for all approved studies with an FSM Principal Investigator (PI). Additional personnel will be identified by the Dean's Office as individuals or departments/units with potential to handle ePHI or other sensitive data.

III. POLICY STATEMENT

Security awareness and privacy training will be required to be completed prior to initial access being allowed to ePHI. Annual training is required thereafter.

Any exceptions to this Policy must be documented in writing and approved by the FSM IT Steering Committee.

IV. PROCEDURE STATEMENT

Training may be fulfilled through programs provided by FSM Information Security, clinical partner covered entities, and the FSM Department of Medical Education. Training programs must be approved by the FSM Dean's Office.

Access to ePHI may be disallowed or suspended if training requests are not completed within 30 days of notification from the FSM Dean's Office. Training completion records by individual will be maintained and monitored to ensure compliance with this policy.

Security awareness updates may be communicated to the FSM community throughout the year as agreed to by the FSM IT Steering Committee.

Training content will be re-evaluated at least annually and updated to reflect changes in best practices and evolving technology risks.

V.   <u>**POLICY UPDATE SCHEDULE**</u>:

Policy review to occur one year after initial implementation and every three years thereafter.

VI.   <u>**REVISION HISTORY**</u>:

11/15/17 – New policy effective.

VII.   <u>**RELEVANT REFERENCES**</u>:

FSM Information Technology Policies
http://www.feinberg.northwestern.edu/it/standards-policies/index.html

FSM Information Security
http://www.feinberg.northwestern.edu/it/policies/information-security/index.html

NUIT Policies, Guidelines, and Practices
http://www.it.northwestern.edu/policies/