

NWF Health Network Policy & Procedure

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| Series: | 900: Data Collection, Records and Reporting | |
| Policy Name: | Security Awareness Training | |
| Policy Number: | 910 | |
| Origination Date: | 03/09/2009 | Revised: Board Meeting of 04/25/2024 |
| Regulation: | CFOP 50 | |

Policy

It is the policy of NWF Health Network (NWFHN), to ensure that all NWFHN staff, volunteers, CMO staff and network providers who access confidential information complete Security Awareness Training.

Procedure

A. General Information on Security Awareness Training.

1. The NWFHN Data Systems Training Coordinator and/or Human Resources will inform all new employees of the need to complete Security Awareness Training and Security Agreement Form prior to employee having opportunity to access confidential information.
2. The NWFHN Data Systems Training Coordinator will track all Security Awareness Training to ensure that all new employees accessing data systems are trained.
3. The Security Awareness Training designed to ensure that each employee is made aware of the relevant laws and policies pertaining to keeping data secure and confidential as well as the penalties prescribed for any violations of these laws and policies.
 - a. The new employee will complete the training and print out a certificate of completion.
 - b. This certificate will be the only acceptable proof of training completion accepted.
4. Security Awareness Training and the Security Agreement form shall be updated annually.
5. If a NWFHN employee, volunteer or CMO employee fails to complete the Security Awareness Training within thirty (30) days of notification the following procedure will be followed:
 - a. The NWFHN Data Systems Training Coordinator will terminate the individual's access to all NWFHN Data Systems.

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- b. The NWFHN Data Systems Training Coordinator will notify the DCF Security Officer of the need to terminate the individual's access to any DCF systems.
 - c. Human Resources will notify NWFHN's Data Systems Training Coordinator of the need to terminate the individual's access to any confidential information in any form.
 - d. Human Resources will notify the employee's manager or the CMO Program Director of the need to terminate the individual's access to confidential information in any form.
6. Any individual failing to complete the training and who has been removed from access to all confidential information will have three (3) days to complete the required training and provide proof of completion.
 7. If the individual fails to complete the required training in the specified timeframe, the individual will be referred to Human Resources with a recommendation for personnel action.
 8. Upon notification of successful completion of Security Awareness Training the following will occur:
 - a. The Data Systems Training Coordinator will reinstate the individual's access to Data Systems.
 - b. The Data Systems Training Coordinator will notify Human Resources of the need to reinstate the individual's access to confidential information.
 - c. Human Resources will notify the employee's manager or CMO Program Director of the need to reinstate the individual's access to confidential information in any form.