

Attachment

Nationally Approved Annual Privacy Training

All Veterans Health Administration (VHA) employees, trainees and volunteers MUST be trained annually using one of the nationally developed privacy training products.

To fulfill this requirement, you must complete the training and ensure it is recorded in the Talent Management System (TMS).

Determining What Annual Privacy Training to Take

There are several modalities of annual privacy training available. Your level of access to VA data determines which privacy training(s) are required for you to meet the annual training requirement. All VHA employees, trainees and volunteers are subject to annual mandatory privacy training due to the Health Insurance Portability and Accountability Act (HIPAA) Privacy Rule. See *VHA Directive 1605.01 Para. 38.h*.

The privacy training options to meet the annual privacy training requirement are as follows:

1. VHA employees with access or potential access to protected health information (PHI), such as veteran or patient information and employee medical records, in the performance of their duties must complete:
 - a. TMS#10203, Privacy and HIPAA Focused Training (web-based course) or TMS#10204 Privacy and HIPAA Focused Training (Print Version); and
 - b. VA Privacy and Information Security Awareness and Rules and Behavior, TMS #10176.

NOTE: VHA Contractors with access to PHI may complete TMS#10203, TMS#10204 or contractor furnished training that meets requirements of the HIPAA Privacy Rule as determined by VHA.
2. VHA trainees and residents with access to PHI and the electronic health record must complete:
 - a. TMS# 3185966, VHA Mandatory Training for Trainees, or TMS# 3192008, VHA Mandatory Training for Trainees – Refresher; and
 - b. VA Privacy and Information Security Awareness and Rules and Behavior, TMS #10176.
3. VHA employees and contractors with access to VA information systems but no PHI need only complete TMS #10176, VA Privacy and Information Security Awareness and Rules and Behavior. **NOTE:** Employee Personally Identifiable Information in ePerformance, electronic Official Personnel Folder (eOPF), VA Time and Attendance System (VATAS), Light Electronic Action Framework (LEAF) and other VA personnel systems is not PHI.
4. VHA Volunteers with no access to the VA Network or VA Information Systems must complete TMS #20929, VA Privacy Training for Personnel without Access to VA Computer Systems or VA Sensitive Information.

Questions regarding which training is appropriate based on level of access to VA data required to perform official VA job duties should be directed to your Supervisor, who can consult the appropriate Privacy Officer for assistance, if needed.