

## Memorandum of Understanding (MOU)

The following constitutes agreement between the Department of Veterans Affairs, Veterans Health Administration (VHA) and the American Federation of Government Employees, AFL-CIO, National Veterans Affairs Council #53 (NVAC) regarding "VHA Health Insurance Portability and Accountability Act (HIPAA)."

1. VHA management officials recognize HIPAA is required by law and therefore, bargaining units employees shall be provided access to the website or hardcopy with sufficient and adequate time to complete the required training on VHA privacy policies.
2. Every effort will be made to release and/or provide coverage for bargaining unit employees to complete the required VHA privacy policy training, which may take from one to 4 hours to complete.
3. Employees will be allowed time to complete the VHA privacy policy training during their normal tour of duty. If a change is necessary, this is an appropriate subject for local bargaining.
4. It is agreed that the large amount of material presented in the VHA privacy policy training means that employees may not retain more than the broad VHA privacy policy outlines unless they deal with it on a regular basis. The status of an individual employee's training will be considered in the event an employee is subject to disciplinary or adverse action during the first six months of the training.
5. Upon receipt, the appropriate management official at the facility shall provide a copy of this MOU to the Local Union President.

  
For Veteran Health Administration

  
For the National VA Council #53

3-12-03  
Date