



**Office of Regulatory Compliance**

## **HIPAA Policy 7.2**

<b>Title:</b>	<b>Training</b>
<b>Source:</b>	<b>Office of Regulatory Compliance</b>
<b>Prepared by:</b>	<b>Assistant Vice Chancellor for Regulatory Affairs</b>
<b>Approved by:</b>	<b>Vice Chancellor for Research</b>
<b>Effective Date:</b>	<b>July 1, 2013</b>
<b>Replaces:</b>	<b>02/26/03</b>
<b>Applies:</b>	<b>All UCD campuses</b>

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## **Introduction**

### ***Purpose***

This policy outlines training requirements for members of the UCD workforce relative to the HIPAA Privacy Regulations.

### ***Reference***

45 C.F.R. § 164.530(b)

### ***Applicability***

HIPAA training is required of every member of the UCD workforce attached to a department that has not been exempted by the Office of Regulatory Affairs. This training shall include the information necessary and appropriate for each faculty, staff, student, trainee, or volunteer to perform his or her job function.

## **Policy**

The UCD will train members of its workforce on the policies and procedures required by the HIPAA Privacy Rule so that each person is able to carry out his or her duties in compliance with UCD HIPAA and Information Security Policies.

## **Procedures**

1. UCD, UCH, CHC, National Jewish, Denver Health and UPI have all agreed to common "Affiliate Principles" regarding HIPAA training. Since each entity is

required to train its workforce under the HIPAA regulations, the Affiliate Principles document the affiliate institutions' agreement that any individual who has been trained by one of the affiliates will be certified by all affiliates as having been trained. Each entity's list of those who have completed training will be shared with the other entities on a regular basis.

2. UCD shall provide training to each new member of the workforce within 30 (thirty) days. This training shall be offered on an on-going basis. Successful completion of this training must occur before that person is granted access to protected health information.

3. Each member of the workforce whose job functions are affected by revisions to any of the following policies and procedures shall be re-trained within a reasonable period of time on the updated policies and procedures. Training shall be offered on an on-going basis.

- a. Policies and procedures required by the HIPAA Privacy or Security Rules and amendments;
- b. UCD HIPAA policies and procedures; or
- c. Both a and b.

4. The UCD shall maintain documentation of what training has been provided to each member of the workforce through the Skillport and PeopleSoft systems. PeopleSoft is the system of record for training documentation.

a. The UCD shall re-train, or provide refresher courses, or awareness training to workforce members as reasonably necessary to ensure adequate continuing knowledge and compliance or when the individual's job function changes to include increased and/or different access to PHI.

b. If a member of the workforce does not complete his or her training within the timeframes noted above in (1), (2), and (3), the UCD will not be held liable for the workforce member's non-compliance and any access to PHI may be disabled. UCD disciplinary actions resulting from an inability to perform job functions may be applied and civil and criminal penalties for non-compliance may be imposed on the personal level.

5. Instructions for accessing the online HIPAA training may be found on the HIPAA web site.

