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**SECTION: ADMINISTRATION**

**AREA: GENERAL ADMINISTRATION**

**SUBJECT: HIPAA EDUCATION AND TRAINING**

### PURPOSE

To ensure that the University of Arkansas for Medical Sciences (“UAMS”) Workforce is properly educated and trained to protect the privacy and security of patients’ health care information.

### SCOPE

The UAMS Workforce.

### DEFINITIONS

**UAMS Workforce** shall mean physicians, employees, volunteers, trainees, and other persons whose conduct, in the performance of work for UAMS, is under the direct control of UAMS, whether or not they are paid by UAMS.

Go to the UAMS HIPAA web site at [hipaa.uams.edu](http://hipaa.uams.edu) to access any other terms or definitions referenced in this policy.

### POLICY

To ensure compliance with the HIPAA regulations, UAMS will provide the UAMS Workforce with the appropriate education and training necessary to comply with the regulations and provide the UAMS HIPAA policies and procedures related to the individual’s role and specific job duties at UAMS. The Required HIPAA Privacy and Security Training must be approved by the UAMS HIPAA Office.

### PROCEDURE

A. **Required HIPAA Training:** All Required HIPAA Privacy and Security Training completed by any of these individuals will be recorded in the UAMS training system or manually maintained by the UAMS office assigned to the specific training. The link for Required HIPAA Privacy and Security Training can be found on the HIPAA website at [hipaa.uams.edu](http://hipaa.uams.edu) and is also available in the UAMS learning management system.

1. All Physicians and other Healthcare Professionals with provider billing numbers, Fellows, and Residents must complete Required HIPAA Privacy and Security Training within sixty (60) days of their appointment date.
2. All employees who attend New Employee Orientation will receive Required HIPAA Privacy and Security Training at that time.

3. All UAMS employees who do not attend Orientation must complete the Required HIPAA Privacy and Security Training within 30 days of hire date.
4. All employees rehired to UAMS must retake the Required HIPAA Privacy and Security Training if they have been separated from UAMS over six (6) months.
5. All UAMS students will receive Required HIPAA Privacy and Security Training as part of Orientation or via the online training course.
6. All affiliated students who will have direct access to patients and/or UAMS computer systems must complete the Required HIPAA Privacy and Security Training. All other visitors who will not have direct access to patients or computer access are required to complete the Level 1 HIPAA Training module.
7. All Job Shadowers will receive HIPAA training in accordance with the 2.1.24 Job Shadowing Policy.
8. All UAMS Volunteers will receive HIPAA training coordinated through the appropriate Office of Volunteers and approved by the UAMS HIPAA Office.
9. All UAMS Academic Visitors who will have direct access to patients and/or UAMS computer systems will receive Required HIPAA Privacy and Security Training. All other visitors who will not have direct access to patients or computer access are required to complete the Level 1 HIPAA Training module. The UAMS Sponsor of the Visitor must provide HIPAA training materials and obtain a signed UAMS Confidentiality Agreement from the Visitor.
10. All other individuals requesting electronic access to PHI are required to complete the HIPAA Privacy and Security Training.

**B. Research HIPAA Training:** UAMS workforce working with human subjects for research purposes must complete the HIPAA training specific to research provided by the UAMS IRB. This includes the principal investigator, co-investigators and research staff including, but not limited to, research associates, research assistants and study coordinators. This research HIPAA training is in addition to the HIPAA Privacy and Security Training.

**C. HIPAA Related Policy and Procedures Training:** It is the responsibility of the individual's supervisor to provide employee training on UAMS HIPAA policies and procedures specific to the individual's area of responsibility.

**D. Ongoing Training:**

1. Inservices will be provided for any additional training as needed for individual departments.

2. All members of the UAMS Workforce must complete annual training in a timely manner.

### **Sanctions**

1. Violation of this Policy will result in disciplinary action in accordance with Administrative Guide Policies 4.4.02, Employee Discipline, 2.1.42, HIPAA Sanctions Policy, and other campus policies. Such action includes an oral warning, a written warning, or termination of employment or dismissal from the academic program.
2. Failure to complete mandatory training in a timely manner may result in suspension without pay. An individual may be suspended without pay for one to five workdays, but a suspension period may not exceed 40 work-hours. While on suspension without pay, an individual may not use accrued leave. In addition to suspension without pay, the individual may receive disciplinary action in the form of either an oral warning or a written warning.
3. In addition to disciplinary action and/or suspension without pay, failure to complete training in a timely manner may result in the disabling of badge access and disabling access to UAMS domain and information systems. Students may be prevented from registering for classes or their continued enrollment in the educational program may be negatively impacted.

**Signature:** \_\_\_\_\_



**Date:** December 18, 2020