



NUMBER: 3.1.30

DATE: 04/01/2003

REVISION: 04/01/2007; 3/30/2010; 02/08/2012

PAGE: 1 of 5

SECTION: ADMINISTRATION

AREA: GENERAL ADMINISTRATION

SUBJECT: HIPAA EDUCATION AND TRAINING

PURPOSE

To insure that the UAMS Workforce is properly educated and trained to protect the privacy and security of patients' health care information.

SCOPE

UAMS Workforce

DEFINITIONS

UAMS Workforce means, for the purpose of this Policy, 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.

To access any other terms or definitions referenced in this policy:
<http://hipaa.uams.edu/DEFINITIONS%20-%20HIPAA.pdf>

POLICY

UAMS will provide to the UAMS Workforce the appropriate education and training necessary to comply with the HIPAA Regulations, and the UAMS HIPAA-related policies and procedures related to the individual's role and specific job duties at UAMS. See HIPAA Training Matrix ([Appendix A](#)) for additional information. Materials for the Required HIPAA Privacy and Security Training must be approved by the UAMS HIPAA Office.

PROCEDURE

All Required HIPAA Privacy and Security Training completed by any of these individuals will be recorded in the UAMS Training Tracker System or manually maintained by the UAMS office assigned to the specific training.

- A. **Required HIPAA Privacy and Security Training:** All Physicians and other Healthcare Professionals with FGP or AHEC provider billing numbers, Fellows and Residents must complete Required HIPAA Privacy and Security Training within sixty (60) days of their appointment date. The link for Required HIPAA Privacy and Security Training is at [HIPAA Office-Employee & Student Training](#).

All employees who attend New Employee Orientation will receive Required HIPAA Privacy and Security Training at that time. Employees will be required to sign an Attestation establishing that the employee completed the Required HIPAA Privacy and Security Training.

All other employees of UAMS who do not attend Orientation must complete an officially sanctioned UAMS HIPAA training program. Employees are required to sign an attestation establishing that the employee completed the required training program within 30 days of hire date.

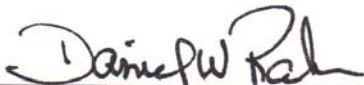
All UAMS students will receive Required HIPAA Privacy and Security Training as part of Orientation or complete online.

All UAMS Volunteers will receive HIPAA training coordinated through the appropriate Office of Volunteers and approved by the UAMS HIPAA Office.

All UAMS Official Visitors will receive Required HIPAA Privacy and Security Training. The UAMS Sponsor of the Visitor must provide HIPAA training materials and obtain a signed UAMS Confidentiality Agreement from the Visitor.

For all other persons, including affiliated students, refer to the [HIPAA Training Matrix \(Appendix A\)](#).

- B. **Research HIPAA Training:** UAMS workforce working with human subjects for research purposes must complete the HIPAA research training with the IRB Human Subjects Training <https://www.citiprogram.org/Default.asp?> This includes the principal investigator, co-investigators and research staff including, but not limited to, research associates, research assistants and study coordinators.
- C. **HIPAA Related Policy and Procedures Training:** It is the responsibility of the individual's supervisor to provide employee training on UAMS HIPAA-related 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. Annual training will be provided to the entire UAMS Workforce.

Signature: 

Date: February 8, 2012

Appendix A

HIPAA Training Matrix – Appendix A

All members of the UAMS workforce (students, faculty, employees, volunteers, official visitors, etc) must have Required HIPAA Privacy and Security Training. If you do not find your group on the matrix below or if you have other questions, please contact the HIPAA Office at 501-603-1379. In addition to the required training modules listed below:

1. Supervisors must provide training on policies and procedures specific to the individual’s role
2. Individuals working with human subjects for research purposes should complete the HIPAA research training along with the IRB Human Subjects training. <http://www.uams.edu/orc/Human%20Subject%20Protection.htm>

<u>Workforce Category</u>	Minimum Training Required in addition to job specific training on HIPAA Policies and Procedures Provided by Supervisor	Documentation
Benefits eligible, non-faculty employees attending Orientation	HIPAA Training in New Employee Orientation	Maintained in Training Tracker
<u>Nonbenefits eligible employees</u>		
<input type="checkbox"/> CCA	Privacy and Security Training Online Module	Maintained in Training Tracker
<input type="checkbox"/> PRN	Privacy and Security Training Online Module	Maintained in Training Tracker
<input type="checkbox"/> U-temp	Privacy and Security Training Online Module	Maintained in Training Tracker
<input type="checkbox"/> Other part-time employees	Privacy and Security Training Self-Study Module or Online Module	Maintained in Training Tracker
<u>Physicians and other faculty</u>		
<input type="checkbox"/> Billing providers	Privacy and Security Training Online Module	Maintained in Training Tracker
<input type="checkbox"/> Residents and Fellows	Housestaff/New Resident Orientation AND Privacy and Security Online Module	Maintained in Training Tracker
<input type="checkbox"/> Nonbilling faculty	Privacy and Security Training Online Module	Maintained in Training Tracker
<input type="checkbox"/> Nonbilling Contract physicians and Locum Tenens	Privacy and Security Training Online Module	Maintained in Sponsoring Department
<input type="checkbox"/> Nonbilling volunteers	Privacy and Security Training Online Module	Maintained in Sponsoring Department

<u>Workforce Category</u>	Minimum Training Required in addition to job specific training on HIPAA Policies and Procedures Provided by Supervisor	Documentation
<u>AHEC's</u>		
<input type="checkbox"/> Physicians and Residents	Privacy and Security Online Module	Maintained in Training Tracker
<input type="checkbox"/> All other employees	Privacy and Security Training Online Module	Maintained in Training Tracker
<u>KidsFirst</u>	Privacy and Security Training Online Module	Maintained in Training Tracker
<u>Nurse Travelers</u>	Privacy and Security Training Self-Study Module or Online Module	Maintained in Training Tracker
<u>Temp Agency Employees</u>	Privacy and Security Training Self-Study Module or Online Module	Maintained in Sponsoring Department r
<u>UAMS Students</u>		
<input type="checkbox"/> COM	Privacy and Security Training Online Module or Freshmen Orientation	Maintained in Training Tracker
<input type="checkbox"/> COPH	Privacy and Security Training Online Module	Maintained in Training Tracker
<input type="checkbox"/> CHRP	Privacy and Security Training Online Module	Maintained in Training Tracker
<input type="checkbox"/> Pharmacy	Privacy and Security Training Online Module and Freshmen Orientation	Maintained in Training Tracker
<input type="checkbox"/> CON	Privacy and Security Training Online Module and Freshmen Orientation	Maintained in Training Tracker
<input type="checkbox"/> Grad School	Privacy and Security Training Self-Study Module or Online Module	Maintained in Training Tracker
<u>Affiliate Students/Interns</u>		
<input type="checkbox"/> Nursing Students	Privacy and Security Training Self-Study Module if computer access is provided*.	Maintained in Sponsoring Department
<input type="checkbox"/> Respiratory Therapy	Privacy and Security Training Online Module*	Maintained in Sponsoring Department
<input type="checkbox"/> Rehabilitation Therapy and Communications	Privacy and Security Training Self-Study Module if computer access is provided*	Maintained in Sponsoring Department
<input type="checkbox"/> Emergency Department	Privacy and Security Training Self-Study Module if computer access is provided*	Maintained in Sponsoring Department
<input type="checkbox"/> Visiting Medical Students	Privacy and Security Training Online Module	Maintained in Sponsoring Department

<u>Workforce Category</u>	Minimum Training Required in addition to job specific training on HIPAA Policies and Procedures Provided by Supervisor	Documentation
<input type="checkbox"/> Other non-UAMS students	Privacy and Security Training Self-Study Module if computer access is provided*	Maintained in Sponsoring Department
<u>Teens</u>		
<input type="checkbox"/> Job Shadowers and MASH Participants	HIPAA Training for Students Participating in Short Term Programs Module plus Parental Confidentiality and Hold Harmless Agreement if minor.	Maintained in Sponsoring Department
<input type="checkbox"/> Volunteers - Adult	HIPAA Training for Students Participating in Short Term Programs Module plus Parental Confidentiality and Hold Harmless Agreement if minor.	Maintained in Sponsoring Department
<u>Volunteers</u>		
<input type="checkbox"/> Volunteer Services	UAMS Privacy and Security Training for Adult Volunteers Module	Maintained in Volunteer Services
<input type="checkbox"/> Volunteer Services - ACRC	UAMS Privacy and Security Training for Adult Volunteers Module	Maintained in ACRC Volunteer Services
<input type="checkbox"/> Patient Education	UAMS Privacy and Security Training for Adult Volunteers Module	Maintained in Patient Education
<input type="checkbox"/> Others	UAMS Privacy and Security Training for Adult Volunteers Module	Maintained in Sponsoring Department
<u>Vendors</u>	Training through Vendor Certification Process*	Maintained in Materials Management
<u>Official Visitors</u>	Privacy and Security Training Self-Study Module if computer access is provided*	Maintained in Sponsoring Department
<u>Academic Visitors</u>	Privacy and Security Training Self-Study Module or Online Module	Maintained in Sponsoring Department
<input type="checkbox"/> Employees	Privacy and Security Training Self-Study Module	Maintained in Training Tracker
<input type="checkbox"/> Nonemployees	Privacy and Security Training Self-Study Module if computer access is provided*	Maintained in Sponsoring Department
	*Those who do not have direct access to patients or computer access may with the approval of the HIPAA Office complete Level 1 HIPAA Overview Training instead.	