



Title: HIPAA Training	Policy #: PRV-13.02
Category: HIPAA Compliance	Authority: 45 CFR § HIPAA SECTION: 164.530(b)(1)
Standard: Training	Responsibility: Health Care Components
Effective Date: 4/14/2003	

PURPOSE:

To ensure that the OSU CHS workforce (including but not limited to faculty, staff, contracted providers, residents, medical students and volunteers) receives training on HIPAA regulations, policies and procedures on the use and disclosure of PHI, as well as training on electronic applications that store, process or transmit PHI, as necessary and appropriate for members of the workforce to carry out their work responsibilities.

POLICY:

1. All members of the OSU CHS workforce must complete HIPAA training at the time of initial employment or association with OSU CHS, at least annually thereafter, when HIPAA regulations or policies change and when otherwise requested by the Compliance Committee.
 - a. New members of the workforce may not access PHI until HIPAA training is completed.
 - b. Supervisors must verify completion of annual HIPAA training at the time of annual performance evaluations.
 - c. HIPAA training from other organizations may be accepted in place of OSU CHS HIPAA training when approved by the OSU CHS Compliance Committee.
 - d. Adjunct professors who are employed 50% or less and do not access PHI at OSU may receive an exemption from HIPAA training, as determined by the OSU CHS Compliance Committee.
2. All members of the OSU CHS workforce who utilize electronic applications that store, process or transmit PHI must complete training for these applications prior to being granted access.
3. OSU CHS must maintain documentation of training completion for at least 6 years.
4. Members of the workforce who do not complete HIPAA training as required will be sanctioned according to Human Resources, Compliance, Student Affairs or other applicable policies.

PROCEDURE:

1. Workforce Members
 - a. At the time of initial employment or other association with OSU, workforce members will be required to complete HIPAA training.
 - i. The workforce member's Supervisor will ensure that HIPAA training is completed within 3 days of employment or other association with OSU and before the workforce member is allowed to access PHI.
 - ii. OSU medical students will take the training at the time of new student orientation or when otherwise assigned to the academic class by the Compliance Office.
 - b. Workforce members, including medical students, will repeat HIPAA training on at least an annual basis, as determined by the OSU CHS Compliance Committee.
2. A member of the workforce will not be given access to an electronic application that stores, processes or transmits PHI until the workforce member has successfully completed training for the application.
3. OSU will maintain documentation of training completion for at least 6 years.
4. Noncompliance with this policy will be addressed by the Compliance Committee, Human Resources, Student Affairs and any applicable policy as appropriate.

DOCUMENT HISTORY:

Approved by OSU Legal Counsel 04/14/2003

Revised 7/1/2013

Revisions approved by OSU CHS executive team: December 2016