

## Texas Tech University Health Sciences Center El Paso Institutional Compliance Procedure

<b>Procedure:</b> Mandatory Education for Employees Without Raiders	<b>Procedure #:</b> HPP 1.4, PRO A
<b>Last Revision Date:</b> May 22, 2023	<b>Effective Date:</b> February 12, 2025
<b>References:</b> HPP 1.4- Education and Training, 45 CFR 164.530, Texas HB 300	
<b>TTUHSC El Paso Institutional Compliance Website:</b> <a href="http://elpaso.ttuhscc.edu/compliance/">http://elpaso.ttuhscc.edu/compliance/</a>	

### **Procedure Statement**

This policy outlines the process for completing Compliance trainings for employees, students, volunteers, contract vendors, and temporary employees without raiders or active Texas Tech Health Sciences Center El Paso (TTUHSC EP) email addresses. Staffing Agency employees will be required to complete HIPAA, General Compliance and Ethics and Standards of Conduct trainings. Volunteers and contract vendors will be required to complete HIPAA training.

### **Scope**

This applies to all TTUHSC EP workforce members (employees and non-employees), including vendors, temporary staff, volunteers, and others who have direct or indirect access to patient Protected Health Information (PHI) created, held, or maintained by TTUHSC EP.

### **Procedure**

1. Workforce members are required to receive HIPAA Privacy Training to help assure compliance with HIPAA policies and procedures, as necessary and appropriate for them to carry out their job functions.
2. The department or staffing agency will contact the Office of Institutional Compliance (Compliance Department) for verification and/or requests of HIPAA training for new employees, contract vendors, volunteers, temporary employees without eRaiders, or employees with active TTUHSC EP email addresses.
  - a. The Compliance Department will request a personal (non-TTUHSC El Paso) email address.
3. The Institutional Privacy Officer will assign the HIPAA Privacy Training via Tech Training which will include:
  - a. HIPAA Training video
  - b. HIPAA Quiz to be completed
4. Successful background checks are required for all volunteers and staffing agency employees. Once the background check has been cleared, the Human Resources' (HR) designee, will submit a request for the required trainings to the Compliance Department at [elpasocomplianceoffice@ttuhsc.edu](mailto:elpasocomplianceoffice@ttuhsc.edu). The HR designee will need to provide the volunteer/staffing agency employee's personal email in the request to begin the process via Tech Training.

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5. The Compliance Department will send instructions to the department or staffing agency for the external user on how to register for Tech Training. The department or staffing agency must provide this information to the external user.
6. Tech Training will send an email notification to the external user e.g., employees, non-tech employees, vendors, and temporary staff.
7. The external user will create a profile with their name and personal email address.
8. The Compliance Department will accept current completion of HIPAA training from other entities. Please note, this does require prior review and approval of material from the Privacy Officer.
9. Once the training is completed, the external user will receive a certification of completion.
10. Training records will need to be merged once the external user receives a TTUHSC EP eRaider. The department or staffing agency must submit a request to the Compliance Department to merge the records.
11. Completion of HIPAA Privacy Training for the calendar year must be documented and maintained in the Tech Training application.
12. HIPAA Privacy training must be completed before the external user is given access to Protected Health Information. Volunteers must complete HIPAA training before reporting to the designated department. At no time will volunteers be allowed to request an eRaider.

### **Frequency of Review**

This procedure will be reviewed in collaboration with HPP 1.4, HIPAA Privacy Training (Every even-numbered year) by the designated Compliance personnel.

**Review Date:** 5/22/2023, 2/12/2025

**Revision Date:** 5/22/2023, 2/12/2025