Tulane University Privacy Training

SCOPE OF POLICY

This policy applies to Tulane University Medical Group, its participating physicians and clinicians, and all University employees and business units who provide management, administrative, financial, legal, and operational support to or on behalf of Tulane University Medical Group and have been designated as members of the Tulane University Health Care Component.

STATEMENT OF POLICY

All members of the Tulane University Health Care Component staff are required to complete certain training (the “Training”) on HIPAA Privacy and Security if they use or disclose individually-identified health information as part of their jobs. The Training must be completed within the first 30 days of employment.

IMPLEMENTATION

Training will be provided to all of the Tulane University Health Care Component staff. Requirements are as follows:

1. The Privacy Official is responsible for the development and implementation of, and compliance with, privacy and training.

2. All members of the Tulane University Health Care Component staff will be trained on privacy policies and practices within thirty (30) days of hire date by Tulane University and thereafter, upon any material change.
   a. New employees must view a HIPAA presentation approved by the Privacy Official and take a quiz.
   b. Passing grade of 60% or better is required. If this is not achieved, then a repeat viewing of the HIPAA presentation with a retake of the quiz is required. If a passing grade of 60% or better is not achieved on the retake, then the Privacy Official will meet with the individual employee.

3. Documentation must be kept for at least ten years on all members who have been trained on privacy policies and practices.
In order to obtain timely compliance with the Training, the Group hereby establishes the following fines for non-compliance:

- With respect to each new employee, the hiring department (the “department”) may be fined $250 per month for each item of the Training that is not completed within the first 30 days of employment and may be fined an additional $250 for each successive 30-day period that the item remains delinquent. Any item of the Training that has not been completed on or after the 31st day of employment in the Health Care Component is considered delinquent.

- Fines will be collected by means of an internal transfer from the department’s nine-ledger account to the Group’s Reserve Fund.

- No fine will be imposed unless (i) the department has been given 15 days notice that the Training is due, and (ii) the Training remains delinquent on the date of the notice of fine.

- Notices will be sent by electronic mail to the department’s compliance liaison with copies to the department administrator, chairman and affected employee (1) at the time an employee is first identified as a member of the Tulane University Health Care Component staff, (2) at the time of a delinquency and (3) monthly as long as the Training remains delinquent. The notice subject line will identify the purpose of the notice.

The Training will be mandatory for any employee who is part of the Health Care Component unless the department establishes in writing with the University Privacy and Contracting Office that the employee does not use or disclose individually-identified health information as part of his or her job.