



THE UNIVERSITY OF NORTH CAROLINA
AT CHAPEL HILL

HIPAA TRAINING POLICY and PROCEDURE

POLICY

UNC – Chapel Hill will provide an ongoing education program relating to the requirements of the Health Insurance Portability and Accountability Act of 1996 (HIPAA). The education program will consist of initial training and on-going training. Participation in the training will be documented through the University’s Human Resources Information System or through the Student Information System. Each covered University unit should have a designated Privacy Liaison and designated Security Liaison who will work with the University’s Privacy Officer and Security Officer to ensure that employees, students, and volunteers in covered University units and Business Associates receive appropriate training. The University’s Privacy and Security Officers may consider and recommend training for additional individuals.

PROCEDURE

1) Initial Training Prior to April 14, 2003:

- a) UNC – Chapel Hill employees, students, and volunteers who work or train with covered University units will complete an education session on the HIPAA regulations and the policies and procedures of UNC – Chapel Hill relating to compliance with those regulations.
- b) Existing Business Associates who participate on site in UNC – Chapel Hill sponsored work will be required to complete an education session on the policies and procedures of UNC – Chapel Hill relating to compliance with HIPAA regulations prior to conducting activities involving direct contact with Protected Health Information (PHI).

2) Initial Training After April 14, 2003:

- a) Within thirty (30) days of initial employment, enrollment, or placement, new UNC – Chapel Hill employees, students, and volunteers who work or train with covered University units will complete an education session on the HIPAA regulations and the policies and procedures of UNC – Chapel Hill relating to compliance with those regulations.

- b) Business Associates who participate on site in UNC – Chapel Hill sponsored work will be required to complete an education session on the policies and procedures of UNC – Chapel Hill relating to compliance with HIPAA regulations prior to conducting activities involving direct contact with Protected Health Information (PHI).
- 3) Annual Training:
- a) UNC – Chapel Hill employees students and volunteers in covered University units will complete an education session that will review and provide updates on the HIPAA regulations and the policies and procedures of UNC – Chapel Hill relating to compliance with those regulations within thirty (30) days of the one-year anniversary of their previous training date. Additional training may be required as necessary for some or all listed individuals, as determined by the University Privacy Officer and/or Security Officer.
 - b) Business Associates who participate on site in UNC – Chapel Hill sponsored work will be required to complete an education session that will review and update the HIPAA regulations the policies and procedures of UNC – Chapel Hill relating to compliance with those regulations as a prerequisite to continuing activities involving direct contact with Protected Health Information (PHI) within thirty (30) days of the anniversary date of the Business Associate agreement.
- 4) Ongoing Awareness Training:
- a) UNC - Chapel Hill employees, students, and volunteers will be provided ongoing awareness privacy/security training. This training will include:
 - Overall privacy/security awareness
 - Periodic reminders
 - Virus awareness
 - Password management
 - Security Incident Reporting
 - User-specific topics necessary for individual workstation security
 - b) Ongoing training may include (without limitation) meetings, University or departmental newsletters or memoranda, e-mail communications, and posters.