

Texas Tech University Health Sciences Center El Paso Institutional Compliance Procedure

Procedure: Compliance Education – Sanctions, Delinquent Learners	Procedure #: 1.0 PRO
Effective Date: May 1, 2024	Last Revision Date:
References: Compliance 1.0, Annual Education, Delinquent Notifications for Institutional Compliance Tech Trainings Procedure, TTU System Reg. 01.05, TGC 572, 45 CFR 164.530, HHS-OIG-GCPG-2023.pdf#page=32	
TTUHSC El Paso Institutional Compliance Website: http://elpaso.ttuhscc.edu/compliance/	

Procedure Statement

This procedure documents the sanction procedure applied to individuals (all faculty and staff) that fail to complete mandatory compliance training. Compliance training is mandated by:

1. Ethics and Standards of Conduct Training is mandated by TTU System Regulation 01.05,
2. Conflict of Interest Training is mandated by Texas Government Code 572,
3. HIPAA Training is mandated by Privacy Rule (45 CFR §164.530) and an Administrative Safeguard of the Security Rule (45 CFR §164.308) and
4. General Compliance Training is mandated by, <https://oig.hhs.gov/documents/compliance-guidance/1135/HHS-OIG-GCPG-2023.pdf#page=32>

Sanctions will be applied equally to faculty and staff and will be determined by meetings with the Vice President of Faculty Affairs and the Vice President of Human Resources.

Scope

This procedure applies to the compliance department staff members responsible for providing management of delinquent learners and to all individuals that supervise delinquent learners.

Procedure

1. The compliance department will assign mandatory compliance training to all faculty and staff utilizing the TechTraining system.
 - a. Mandatory compliance lessons assigned to all faculty and staff include:
 - i. General Compliance Training,
 - ii. HIPAA Training,
 - iii. Conflict of Interest Training, and
 - iv. Ethics an Standards of Conduct Training.
2. The compliance department will assign mandatory compliance training to all faculty and staff during the month of January each year.
3. Learners will have 90 days to complete the training.

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4. The compliance department leadership will meet with the vice president of human resources and the vice president of faculty affairs to determine appropriate sanctions for individuals for individuals that fail to complete compliance training.
 - a. The results of the meeting Will be discussed with the president of the university prior to implementation.
 - b. It is noted that the delinquent learner report will identify a list of individuals that fail to complete the mandatory training during the previous calendar year as well as the current calendar year.
5. Sanctions will be applied to all individuals without regard to job title or position in the organization.
6. Frequency of reporting:
 - a. Compliance department staff will begin distributing delinquent learner reports Beginning in the month of June of each calendar year.
 - b. the assigned compliance staff member will utilize the “*Compliance Tech Trainings Procedure*” to create the reports that will be distributed to management.
 - c. The delinquent learner reports will be distributed monthly during the months of June, July, August, September and October.
 - d. During the month of November and December, the delinquent reports will be distributed two times a month.

Frequency of Review

This policy will be reviewed on an annual basis, prior June issuance of the first delinquent learner report.

Review Date:

Revision Date: