

Texas Tech University Health Sciences Center El Paso Institutional Compliance Procedure

Procedure: Assigning Compliance Mandatory Education to external users without eraiders or active TTUHSC El Paso email address	Effective Date: May 22, 2023 Last Revision Date: May 22, 2023
References: HPP 1.4- Education and Training, 45 CFR 164.530, Texas HB 300	

Procedure Statement

This policy outlines the process for completing Compliance Training for external employees, rotating students, volunteers, contract vendors, and temporary employees without eraiders or active Texas Tech University Health Sciences Center El Paso (TTUHSC EP) email addresses. Compliance training will include HIPAA Privacy Training, General Compliance, Ethics, and Standard of Conduct.

Scope

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

Definition

External users are non-TTUHSC EP employees who have been granted authorization to access our network. This includes but is not limited to:

- a. Staffing Agency's temporary employees
- b. Rotating students
- c. Volunteers
- d. Contract vendors
- e. Future faculty that are in the onboarding process.

Procedure

1. Workforce members must receive compliance training to ensure compliance with HIPAA policies and procedures and health care compliance as necessary and appropriate to carry out their functions.
 - a. After reviewing and approving content by the Institutional Privacy Officer, the Office of Institutional Compliance will accept the current completion of HIPAA training from other entities.
2. Departments /staffing agencies will notify the Office of Institutional Compliance to assign compliance training via email at elpasocomplianceoffice@ttuhsc.edu to external employees, contract vendors, and staffing agency employees without eraiders. Compliance trainings will include:
 - a. Training video
 - b. Quiz (when applicable)
3. Department/staffing agencies will provide the following information to the Office of Institutional Compliance. The Office of Institutional Compliance will use the information to create the Tech Training profile.:

Texas Tech University Health Sciences Center El Paso Institutional Compliance Procedure

- a. Vendor Name (if it is a staffing agency or business partner)
 - b. Individual's full name
 - c. Personal (Non-TTUHSC El Paso) email address
 - d. Department external employee will be working for
4. External users will receive an email with the link to the Tech Training application to finalize their profile and access the training assigned to them.
 5. Once trainings are completed and quizzes have been passed (when applicable), the external user can print a certificate of completion. Individuals will provide this certificate to department or staffing agency personnel.
 - a. If the external user fails to pass the quiz, they must email the Office of Institutional Compliance at elpasocomplianceoffice@ttuhsc.edu to unlock the course.
 6. If a staffing agency employee becomes a TTUHSCE EP workforce member, the agency is responsible for immediately notifying the Office of Institutional Compliance of this change.
 7. Compliance staff will merge training records once the external user becomes a TTUHSC EP employee.
 8. HIPAA Privacy Training must be completed before external users can access Protected Health Information (PHI).
 9. Staffing agency employees will be required to complete compliance training annually.

Frequency of Review

The Institutional Privacy or Compliance Officer will review and revise this procedure as appropriate.

Review Date: May 22, 2023

Revision Date: May 22, 2023