

**CREIGHTON UNIVERSITY
POLICY REGARDING PRIVACY TRAINING FOR NEW EMPLOYEES, STUDENTS AND
RESIDENTS**

I. PURPOSE

This policy is designed to inform Creighton Personnel in Creighton's clinics of the requirements for training staff on HIPAA privacy requirements and documenting such training.

II. POLICY

All employees with job-related access to patient protected health information must receive basic privacy training (covering the Health Insurance Portability and Accountability Act of 1996) within thirty (30) days of employment in that position. Students (whether Creighton students or from another institution) and residents who rotate in Creighton's clinics must have received HIPAA privacy training prior to working or rotating in Creighton clinics.

III. SCOPE

This policy applies to Creighton Clinic Pharmacy, Creighton Dental Clinics, Creighton Pediatric Therapy and Creighton Specialty Pediatrics.

The following persons must comply with this policy: all employees, faculty, residents and students rotating through Creighton clinical settings and any students from other institutions rotating through Creighton clinical settings ("Creighton Personnel").

IV. PROCEDURES

A. Training for Employees

Clinic administrators must arrange for HIPAA privacy training of each new employee within thirty (30) days of employment. Training can be at a session scheduled with the University Privacy Officer or using the online training available through Human Resources.

B. Training for Students and Residents

All Creighton Health Sciences students receive appropriate HIPAA training through their Creighton Health Sciences program. Any non-Health Sciences Creighton students must provide proof of HIPAA training certified by the University Privacy Officer. Non-Creighton students must submit proof of HIPAA privacy training from their educational institution.

C. Documentation of Training

Department and Clinic Administrators must document completion of training for each new employee. Documentation must be provided to the Privacy Officer within 30 days of completion of the training.

V. ADMINISTRATION AND INTERPRETATIONS

Questions regarding this policy may be addressed to the University Privacy Officer at 402-280-3469 or via e mail to privacy@creighton.edu.

VI. AMENDMENTS OR TERMINATION OF THIS POLICY

This policy may be amended or terminated at any time.

VII. ENFORCEMENT AND DISCIPLINE

Disciplinary action for violations shall be determined in accordance with University's progressive disciplinary policy for Creighton employees. Disciplinary action for violations of this policy by students shall be determined at the school level. Disciplinary action for violations by residents will be determined at the program level. Disciplinary action will be based upon the severity and/or frequency of the violation.

VIII. AMENDMENTS OR TERMINATION OF THIS POLICY

This policy may be amended or terminated by Creighton University at any time.