

UPG Compliance Training Assignment & Monitoring

A. POLICY:

It is the policy of the University of Virginia Physicians Group (UPG) to provide employee training for Compliance with state and federal regulations that include but is not limited to Health Insurance Portability and Accountability Act (HIPAA) Privacy and Security Rules.

B. PROCEDURE:

Each employee will be required to complete the online Compliance Training as outlined below:

New Employees

1. UPG Human Resources (HR) will assign the computer-based learning (CBL) module to each new employee with a deadline for completion of 30 days from date of assignment.
2. HR Training & Organizational Development (HRTOD) will generate a weekly report to monitor compliance by new employees.
3. Reminders will be sent to those employees who have not completed the training at that point in time.
4. If an employee is identified as non-compliant within the 30-day time limit, HRTOD will notify the UPG Privacy Officer.
5. UPG Privacy Officer will contact employee's supervisor/manager to discuss and ensure that compliance is achieved.
6. If a new employee is identified as not successfully completing the corresponding test for the module, HRTOD will notify the UPG Privacy Officer
7. The UPG Privacy Officer will contact the employee to arrange a face-to-face training.

Annually

1. All current employees will be notified that they must complete the online Compliance training within 30 days of assignment. Subsequent annual trainings will commence one year from the date of the previous year's training.
2. The UPG Privacy Officer will generate a bi-weekly report to monitor compliance and reminders will be sent to those employees who have not completed the training.
3. The Privacy Officer will contact the supervisor/manager of any employees who have not completed the CBL by the designated deadline. It is expected that the supervisor/manager will ensure employee compliance as soon as possible.

5. Employees who have not completed the CBL within fourteen (14) days of the deadline will be subject to a three (3) day suspension.

C. **CROSS REFERENCED MATERIALS:** N/A

D. **FORMS:** N/A

E. **SCOPE:**
This policy and procedure gives direction to the UPG Privacy Officer, UPG Human Resources and Human Resources Training and Organizational Development on the assignment and monitoring of the UPG Compliance Training.

F. **ADMINISTRATION:**
This policy and procedure will be administered by the Privacy Officer and will be reviewed on a periodic basis.

G. **DISTRIBUTION:**
UPG Privacy Officer, Human Resources, and Human Resources Training and Organizational Development.