The purpose of this policy is to comply with the Privacy Rule of the HIPAA law. The Privacy Rule of the Health Insurance Portability and Accountability Act of 1996 became effective on April 14, 2003. The Rule protects the privacy of patients and provides them with new rights regarding the use and disclosure of protected health information. The Privacy Rule requires covered entities such as the University of Chicago Hospitals and Biological Sciences Division to train all members of its workforce on the policies and procedures that address protected health information, as necessary for the individual member of the workforce to carry out his or her job.

POLICY
All new members of the workforce of the University of Chicago Hospitals and the Biological Sciences Division of The University of Chicago must complete mandatory HIPAA/Privacy Rule training. This obligation to complete the training may be fulfilled by:

1. Attendance at the HIPAA education session at new employee orientation, or
2. Obtaining a user ID and completing the computer-based training program offered through the Office of Medical Center Compliance
3. Reading the HIPAA Privacy Document (5 page) provided by the Office of Medical Center Compliance.

Members of the University of Chicago Hospitals and the Biological Sciences Division workforce who may fulfill the obligation through this method are primarily employees who do not have direct patient contact or access to protected health information. Employees to whom this rule applies includes the following but is not exclusive of additional members of the workforce:
- University students providing limited short-term support to research areas
- Non-UCH or non-BSD workforce members in University payroll, NSIT, research, human resources departments
- Allied Health students rotating in Physical Therapy, Occupational Therapy, or Respiratory Therapy for less than 4 weeks.

The Office of Medical Center Compliance will make the final decision regarding the fulfillment of the training obligation if a question arises related to a workforce members need to complete the training.
Workforce members are required to complete the training within 45 days of the start date of employment. The Office of Medical Center Compliance should be notified by the manager of the new employee ASAP after hire to obtain a user ID for completion of the training. Employees who do not comply with the policy for HIPAA training may be subject to suspension/termination from employment at the University of Chicago until the requirement is met.

The Office of Medical Center Compliance will be accountable for monitoring, tracking, and maintaining the attestations and completion status of the workforce of the University of Chicago Hospitals.