

STANDARD ADMINISTRATIVE PROCEDURE

16.01.02.M0.03 HIPAA Training

Approved April 27, 2020

Revised October 17, 2022

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SAP Statement

This standard administrative procedure applies to the Texas A&M University (TAMU) components that have been designated as a TAMU HIPAA Health Care Component (TAMU HIPAA HCC) in Standard Administrative Procedure 16.01.02.M0.01, *Designation as a Hybrid Entity*.

Definitions

[Click to view Definitions](#)

Official Procedure

1. GENERAL

Training will be provided to all individuals of the TAMU HIPAA HCC personnel including employees, volunteers, participating physicians, residents, clinicians and members of the HIPAA workforce in accordance with HIPAA regulations and TAMU System Policy 33.05 Employee Training.

1.1. The TAMU Privacy Officer is responsible for the development and implementation of, and compliance with, HIPAA privacy policies, practices and the training thereof. TAMU Chief Information Security Officer (CISO) is responsible for the development and implementation of, and compliance with, HIPAA security measures.

1.2. All TAMU HIPAA HCC personnel, including employees, volunteers, and contractors of the TAMU HIPAA HCC shall be trained on privacy policies and

practices during the new employee orientation process or before performing services for the TAMU HIPAA HCC and regularly thereafter, in accordance with the training schedule assigned.

- 1.3. Each TAMU HIPAA HCC will retain documentation for all individuals receiving HIPAA or other privacy training for seven (7) years.

2. PROCEDURE

Each employee of the TAMU HIPAA HCC that provides health care services or who has access to Protected Health Information (PHI) under HIPAA shall complete the TAMU HIPAA training program prior to providing any services or accessing PHI and renew training on a biennial basis, unless the Privacy Officer deems more frequent intervals are necessary. Any employee who has not completed the required training will be subject to sanctions in accordance with TAMU System Policy 33.05 Employee Training.

- 2.1. Each TAMU HIPAA HCC is responsible for providing HIPAA training to all TAMU HIPAA HCC personnel.
- 2.2. The TAMU Privacy Officer is responsible for monitoring HIPAA training programs for compliance in coordination with each TAMU HIPAA HCC and, as appropriate, TAMU Human Resources, Texas A&M HSC and the Research Security Office.
- 2.3. Any extenuating circumstances that would not allow for compliance with this procedure must be reported, in writing, to the TAMU Privacy Officer.

3. VIOLATIONS

The TAMU Privacy Officer has general responsibility for implementation of this procedure. Employees who violate this procedure will be subject to disciplinary action up to and including termination of employment. Anyone who knows or has reason to believe that another person has violated this procedure should report the matter promptly to their supervisor and the TAMU Privacy Officer. All reported matters will be investigated and, where appropriate, steps will be taken to remedy the situation. Where possible, every effort will be made to handle the reported matter confidentially. Any attempt to retaliate against a person for reporting a violation of this procedure will itself be considered a violation of this procedure that may result in disciplinary action up to and including termination of employment.

Related Policies, Statutes, Procedures

[45 CFR §164.530 \(b\)\(1\), Administrative Requirements – Standard: Training](#)

[System Policy 33.05, Employee Training](#)

[System Regulation 33.05.02, Required Employee Training](#)

[University SAP 16.01.02.M0.01, Designation as a Hybrid Entity.](#)

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