Guidance on HIPAA Training Requirements for Sponsored Identities:

Sponsored Identities associated with Yale HIPAA-covered departments are required to complete HIPAA training based on their ability to access or be exposed to HIPAA protected health information (PHI) and electronic PHI.

1. Sponsored Identities with access to the Yale network:

Sponsored identities who have been provided network access and/or a yale.edu email address must complete the online training at http://hipaa.yale.edu/hipaa-privacy-and-security-training   Following the quiz, the course will automatically record completion of Foundational HIPAA Privacy and Security Training requirement. These individuals are required to complete the Annual Security Attestation and HIPAA Refresher requirement as well at:
https://bmsweb.med.yale.edu/tms/tms_enrollments.offerings?p_crs_id=2448&p_std_id=#
Examples may include some non-Yale clinical practice staff, clinical research affiliates, consultants.

2. Sponsored Identities with access to Yale PHI but who do not have access to the Yale network:

Sponsored Identities who do not have access to the Yale network or a yale.edu email but who have access or exposure to Yale PHI through visits to Yale or other activities must read and sign the relevant training booklet. Signed signature pages should be sent to the HIPAA Privacy Office (hipaa@yale.edu or fax to 432-4033). The training booklets can be found under "Non-Activated NetID Users" at
http://hipaa.yale.edu/training/training-modules
Examples could include some site visitors, volunteers, and student visitors without network access.

3. Sponsored Identities who do not have access to Yale PHI or to the Yale Network

Sponsored Identities who meet the four requirements listed on the Exemption Form can be excused from HIPAA training and from the annual HIPAA Security attestation requirement. Specifically, these are individuals who:

- Will not provide health care to patients; and
- Will not be engaged in human subjects research; and
- Will not be provided access to University resources that maintain PHI and/or ePHI including both clinical and research data and data systems; and
- Will not be provided with a PIN to activate their Net ID

The departmental lead administrator should complete the form on behalf of the sponsored identity and send the form to the HIPAA Privacy Office (hipaa@yale.edu or fax to 432-4033). The form is located at:
http://hipaa.yale.edu/sites/default/files/files/HIPAA-Privacy-and-Security-Training-Exemption-Form.pdf
Examples may include daycare staff and some contractors.

4. Sponsored Identities provided network access as a Business Associate:

Sponsored Identities who work for a Yale Business Associate are expected to have completed HIPAA training through their employer as required in the Business Associate Agreement. These individuals should be brought to the attention of the HIPAA Privacy Office and they will be noted as such in the Training Management System. The HIPAA Privacy Office may be reached at hipaa@yale.edu or 432-5919. As a reminder, it is crucial that these individuals be terminated by the department who sponsored these individuals when the contracts is no longer in effect or when the individual is no longer in a role requiring Yale network access.
Examples may include vender software support personnel, consultants and contractors.