

HEALTH SCIENCE CENTER HANDBOOK OF OPERATING PROCEDURES

Chapter 4	General Personnel Policies	Effective:	November 2000
Section 4.10	Employee Development and Training	Revised:	November 2010
Policy 4.10.4	Disciplinary Actions for Failure to Attend Compliance Training Sessions	Responsibility:	Assistant Vice President for Regulatory Affairs & Compliance

DISCIPLINARY ACTIONS FOR FAILURE TO ATTEND COMPLIANCE TRAINING SESSIONS

Policy

Each employee is required to attend certain mandatory training sessions based on his or her job responsibilities. Training for the identified areas must be completed within a specified timeframe. Failure to meet training requirements will result in disciplinary action. Each department responsible for training will maintain the necessary training attendance documentation.

Chart Documentation and Billing Training Requirements

All new School of Medicine Faculty Practice Plan providers must complete the training within thirty (30) days from the date an MSRDP provider number is issued, or within thirty (30) days from the date of hire, whichever is most recent. New MSRDP and UT Medicine personnel and residents must complete training within thirty (30) days from the date of employment. Ongoing providers, residents, MSRDP and UT Medicine personnel are required to complete training annually by the end of each fiscal year, i.e., August 31.

Sponsored Research Training Requirements

All persons holding signature authority on sponsored programs ("K" account series and clinical research agreements housed in the "T" account series) must complete training within ninety (90) days of receiving notification of an award or execution of an agreement.

IRB Training Requirements

All Principal Investigators participating in research involving human subjects must complete training prior to the IRB granting final approval of the research proposal. Review and approval of proposals by the IRB takes four (4) to six (6) weeks, during which time training can be completed.

IACUC Training Requirements

All Principal Investigators and staff who use laboratory animals in research, teaching, or education; all departmental animal research officers; and all Department of Laboratory Animal Resources personnel must take appropriate training. The IACUC will not approve proposals

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until the training requirements for principal investigators and their staff has been completed.

Environmental Health and Safety Training Requirements

All Principal Investigators using radioactive and biological materials must have documented training prior to beginning of a protocol, study, or clinical trial.

Patient Privacy Training Requirements

All employees of the Health Science Center are required to complete mandatory training on patient privacy regulations and policies based on his/her job responsibilities. See [Section 11.4.1](#) of the *Handbook of Operating Procedures* (HOP), "Education and Training on Patient Privacy". Training will need to be completed by new employees within thirty (30) days of employment.

Endowment Account Managers Training Requirements

All endowment holders and/or their designated assistants who are authorized to expend and manage endowment disbursements must complete orientation and annual refresher training on proper endowment management and reporting requirements. Completion and documentation of interactive Web-based training or face-to-face training for this purpose is equivalent.

General Compliance Awareness Training Requirements

All new Health Science Center employees will be required to complete "General Compliance Awareness Training" within thirty (30) days of employment.

All Health Science Center employees will be required to complete training every two (2) years by the end of the fiscal year, i.e., August 31.

First Step

Executive Committee members will be notified by the responsible training party of the following consequences which have resulted because of non- attendance at training sessions:

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1. Chart Documentation and Billing Training: Suspend billing privileges of MSRDP providers or modify job duties of MSRDP/UT Medicine personnel. For residents, the employer will be contacted to take appropriate disciplinary action.
 2. Sponsored Research Training: Remove signature authority on all sponsored research accounts. No additional research proposals accepted until attendance has taken place.
 3. IRB Training: No final IRB approval for new proposals.
 4. IACUC Training: Relieved of duties related to animal care and allow no contact with animals.
 5. Environmental Health and Safety Training: Suspend ordering and handling of radioactive and biological materials.
 6. Patient Privacy Training: Relieved of duties related to patient care or research responsibilities.
 7. Endowment Compliance Training: Suspend billing privileges of endowment holders or designated assistants, and modify job duties of personnel to include endowment compliance account management and completion of mandatory annual training. Privileges will be renewed only after successful completion and documentation of required training.
 8. General Compliance Awareness Training: Suspend billing privileges of MSRDP providers. Start disciplinary proceedings for other employees.

Second Step

If training is not completed by the end of the fiscal year, i.e., August 31, or within forty-five (45) days of notification by the responsible training party to the Executive Committee member, then the Executive Committee member must initiate disciplinary action within the existing policies and procedures, including suspension without pay.

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Final Step

If the training is not completed within forty-five (45) days after the applicable date in Second Step above, the Executive Committee member must initiate termination proceedings in accordance with existing policies and procedures.
