

University of Louisville Hospital		POLICY/PROCEDURE	
Subject: EDUCATION and TRAINING		Policy no. 859-0314	Page: 1 of 2
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Education and Training

Purpose

The developing and implementation of regular, effective education and training seminars for employees are integral parts of the compliance & ethics program. Compliance education is divided into two general components. First, all employees must receive and introduction to the compliance program. Second, employees whose work is linked to identified risk areas should receive specialized compliance education pertaining to their function and responsibilities

Policy

1. All employees, including new hires, will receive education related to the organization's overall compliance & ethics program.
2. Employees in identified risk areas will receive more detailed education related to their function and responsibilities.

Procedures

1. The Vice President of Compliance & Ethics is responsible for developing the compliance & ethics education curriculum and monitoring and ensuring that the compliance training and orientation meets the policy standards on this subject.
2. Compliance & ethics education seminars must include an explanation of the structure and operation of the compliance program.
3. Compliance & ethics education seminars, at a minimum, will include information on the following aspects of the compliance program:
 - Code of Conduct and other related written guidance;
 - Communication channels (Hotline);
 - Organizational expectations for reporting problems and concerns; and
 - Non-retaliation/retribution policy.
4. Comprehensive education materials will be developed to facilitate the compliance sessions and ensure that a consistent message is delivered to all employees. Education protocols and materials must be standardized, so as to evidence that everyone attending a seminar receives the same instruction.
5. Employees will be provided with the opportunity to seek clarification or more information on any aspect of the compliance & ethics program.
6. Only properly trained individuals will be used to provide compliance education and training seminars. Compliance & ethics program trainers must be knowledgeable of the:

- (a) compliance & ethics program;
 - (b) applicable federal laws and regulations;
 - (c) requirements of the Sentencing Commission Guidelines;
 - (d) relevant organization policies/procedures;
 - (e) operations of the compliance & ethics program; and
 - (f) content of the Code of Conduct.
7. The Vice President of Compliance & Ethics is responsible for coordinating with management to ensure that specialized compliance education occurs in identified risk areas, such as quality of care and the prevention and detection of fraud, waste and abuse (see the Code of Conduct).
- Note: The examples above are not exclusive and employees are expected to fulfill their education requirements and seek guidance on various compliance issues.
8. The Vice President of Compliance & Ethics is also responsible for submitting periodic reports to the Audit and Finance Committee of the Board on education seminars related to the compliance & ethics program.