



COMPLIANCE: EDUCATION AND TRAINING

Purpose:

To ensure that all Boulder Community Health (“BCH”) employees receive appropriate training about BCH's Compliance Program, policies, and Standards of Conduct.

Scope:

Applies to all BCH staff at all BCH locations.

Policy Statements:

- As a recipient of funding from the Federal Government, BCH is required to provide all employees and members of the workforce with annual training on the elements of the Compliance Program and BCH's expectations that all will act in accordance with applicable laws, policies and standards.
- Each new employee (including management) will receive education on the Compliance Program during New Employee Orientation, which will occur within 90 days of hire. Orientation training will be supplemented with detailed training on regulations and laws to help employees fulfill their job responsibilities in an ethical and legal manner.
- BCH compliance refresher training is required of all staff once a calendar year.
- Staff in identified compliance high risk areas may receive more specific training related to their job function and responsibilities as part of their BCH orientation process and on an on-going basis.
- All volunteers receive compliance education as part of their volunteer orientation.
- The BCH Board of Directors will receive annual compliance training detailing its responsibility for oversight of the Compliance Program.
- Completion of compliance training is a condition of continued work at BCH.

Procedural Guideline Statements:

1. Orientation Compliance Training:
 - a. This general education and training program during orientation shall include, but not be limited to, the following topics:
 - i. BCH's compliance philosophy and general commitment to compliance.
 - ii. General compliance policies and standards applicable to all employees (available on the BCH intranet site).
 - iii. The employee's obligation to adhere to all applicable laws, regulations and BCH's standards of conduct and the consequences for violations.
 - iv. The employee's obligation to report any suspected illegal or improper conduct and the procedures for making such reports.
 - v. Identification of the Compliance Officer and his or her authority and responsibility and identification of other persons in the Hospital and the employee's department responsible for overseeing compliance.



- b. The general education program shall be conducted by the Compliance Officer or a designee of the Compliance Officer who has sufficient knowledge and training to conduct the program.
 - c. The Orientation Compliance Training completion will be tracked by Human Resources and an acknowledgment form will be maintained in the employee's file.
2. Specific Compliance Training and Education:
- a. Employees and or individuals who are required to adhere to specific compliance standards or perform duties which require specific compliance training shall receive additional training and education in the relevant areas.
 - b. Circumstances which may warrant specific training and/or more frequent training and education include changes in applicable laws or regulations, identification of specific risk areas, issuance of new government directives or discovery of areas of noncompliance.
 - c. The Compliance Officer shall be responsible for overseeing the training and education of BCH employees and agents with respect to compliance issues.
 - d. The Compliance Officer, in consultation with members of senior management and department directors, shall identify those subcontractors and other agents who are required to adhere to specific BCH compliance standards or perform duties on behalf of BCH which require specific compliance training. These individuals shall receive education and training regarding BCH's general compliance standards and the specific compliance standards applicable to the duties the individuals perform for BCH.
 - e. The Compliance Officer shall coordinate with the Medical Staff Department and the leadership of the medical staff to provide education and training to members of the medical staff and other credentialed practitioners who perform duties which affect compliance.
3. The training and education required by this policy is a condition of employment or contractual relationship with BCH. No employee or agent shall perform functions which require adherence to compliance standards without receiving the required training, unless written permission is obtained from the Compliance Officer.

Definitions:

1. **Contracted Staff:** Agency staff or other individuals who provide services to BCH through a contractual arrangement.

Resources:

[Compliance: Code of Conduct](#)

[Compliance: Program Structure and Responsibilities](#)

[Compliance: Reporting Issues and Concerns](#)

[Employees: Required Education](#)

References:

None

Key Words: compliance, training, education, mandatory Compliance education, computer based training, BCH University



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