



POLICY TITLE: Compliance Training

Responsible Department: Audit and Compliance

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SUMMARY & PURPOSE:

To describe the nature of training that the organization provides in order to communicate the principles of the Corporate Compliance Program and to promote awareness of each individual's responsibility under the Code of Ethics.

POLICY:

All Covered Persons receive adequate periodic education and training on the importance of compliance and what is expected of them under the Corporate Compliance Program. Training programs are designed to instruct about applicable legal and ethical issues and to deter wrongful behavior.

SCOPE/APPLICABILITY:

All owners, officers, directors, and employees of South Miami Hospital; all contractors, subcontractors, agents, and other persons who furnish patient care items or services or who perform billing or coding functions on behalf of South Miami Hospital, excluding vendors whose sole connection with South Miami Hospital is selling or otherwise providing medical supplies or equipment to South Miami Hospital; and all physicians and other non-physician practitioners who are members of South Miami Hospital's active medical staff. (Covered Persons)

PROCEDURES TO ENSURE COMPLIANCE:

1. Training on the Corporate Compliance Program, including the Code of Ethics, will be included in the orientation program which is mandatory for all new-hire employees.
2. The Corporate Compliance Program will also be included as a part of the annual required training for all Covered Persons.

3. Training topics will include South Miami Hospital's Corporate Integrity Agreement requirements and Compliance Program, as well as the applicable Federal healthcare program requirements, including the requirements of the Anti-Kickback Statute and the Stark Law.
4. Board of Director training will be conducted on an annual basis and will cover the corporate governance responsibilities of board members, and their responsibilities with respect to review and oversight of the Compliance Program. Specifically, the training must address the unique responsibilities of healthcare Board members, including the risks, oversight areas, and strategic approaches to conducting oversight of a healthcare entity. New members must receive the Board Member Training within 30 days after becoming a Board member.
5. Training sessions may, at the discretion of the Corporate Vice President and Chief Compliance Officer, include the use of videos, workshops, presentations by legal staff and outside consultants, or other appropriate methods to help assure that the compliance message is received.
6. Audit and Compliance maintains a record of each training session. HR Talent Management & Development records and tracks attendance and completion of mandatory new employee orientation and annual required training.
7. At the time of their annual evaluation, all leaders must certify that the employee being evaluated has completed their annual required Corporate Compliance Program training.
8. Failure to complete any required Corporate Compliance Program training will result in disciplinary actions, such as a delay in processing an employee's annual performance evaluation, including any pay actions.

SUPPORTING/REFERENCE DOCUMENTATION:

- United States Federal Sentencing Guidelines
- Office of Inspector General Compliance Program Guidance for Hospitals
- Office of Inspector General Supplemental Compliance Program Guidance for Hospitals
- South Miami Hospital Corporate Integrity Agreement

RELATED POLICIES, PROCEDURES, AND ASSOCIATED FORMS:

- BHSF Administrative Policy: 819 Code of Ethics – Audit and Compliance
- SMH Administrative Policy: 819 Code of Ethics
- BHSF Departmental Policy: 74730-826 Communicating Corporate Compliance Program Standards Policy – Audit and Compliance

ENFORCEMENT & SANCTIONS:

Enforcement of this policy is the responsibility of the Audit and Compliance Department. Failure to comply with or report a violation of a compliance program policy can lead to disciplinary action up to and including termination.