



POLICY/GUIDELINE TITLE: Compliance Training and Education	ADMINISTRATIVE POLICY AND PROCEDURE MANUAL
POLICY #: 800.69	CATEGORY: Compliance and Ethics
System Approval Date: 4/19/18	Effective Date: NEW
Site Implementation Date: 5/23/18	Last Reviewed/Approved: NEW
Prepared by: The Office of Corporate Compliance	Notations: N/A

GENERAL STATEMENT of PURPOSE

Northwell Health is committed to providing training and education on our Compliance Program. The training provides Affected Individuals with information about compliance issues, Northwell Health expectations and the operations of the Compliance Program.

POLICY

Affected Individuals are required to receive and complete training and education on a regular basis. Specialized and/or targeted training will also be provided to Affected Individuals on an as-needed basis.

SCOPE

This policy applies to all Northwell Health employees, as well as medical staff, volunteers, students, trainees, physician office staff, contractors, trustees and other persons performing work for or at Northwell Health; faculty and students of the Donald and Barbara Zucker School of Medicine at Hofstra/Northwell conducting research on behalf of the Zucker School of Medicine on or at any Northwell Health facility; and the faculty and students of the Hofstra Northwell School of Graduate Nursing and Physician Assistant Studies.

DEFINITIONS

Affected Individuals - Northwell Health employees, as well as medical staff, volunteers, students, contractors, trustees and other persons performing work for or at Northwell Health.

Students - Students refer to allied health profession trainees as well as undergraduate and graduate medical education trainees (e.g., students of health profession programs). In this context we are referring to students who are enrolled in a school in which Northwell Health has a formal legal affiliation agreement.

Voluntary Physicians - Members of the Medical Staff who maintain a private clinical practice independent of the Hospital.

PROCEDURE/GUIDELINES

1. Orientation Compliance Training

- a) Employees: At time of hire, employees receive compliance training and education, either through the pre-employment electronic workflow (Taleo system) or on paper, as appropriate. Topics include, but are not limited to: safety, quality, infection control and prevention, patient privacy, workplace respect, the Code of Ethical Conduct and HIPAA requirements.
- b) In addition, at the time of hire, employees also receive a copy of the Code of Ethical Conduct either through the pre-employment electronic workflow (Taleo system) or on paper, as appropriate, and are required to review the Code of Ethical Conduct, acknowledge such review, and agree to abide by our Code of Ethical Conduct and compliance policies and procedures.
- c) The Code is also available on the Intranet, on the Office of Corporate Compliance (Corporate Compliance) webpage. Hard copies of the Code are available from Compliance.
- d) Recently integrated entities will provide Northwell Health assurance that they provide compliance training and education to their employees as well as medical staff, volunteers, students, trainees, physician office staff, contractors, trustees and other persons performing work for or at their entities upon hire and annually thereafter. Recently integrated entities may initially maintain their own tracking logs and attestation of training. Once these entities are completely integrated into Northwell Health, they adhere to Northwell Health's Corporate Compliance training schedule.
- e) Applicable Contractors: Covered staff are provided similar or equivalent orientation programs covering compliance topics as applicable to their position/role.
- f) Volunteers: As part of their onboarding orientation training, new volunteers receive education on compliance-related topics at their respective sites. In addition, volunteers attest that they have reviewed the training and agree to abide by our Code of Ethical Conduct and compliance policies and procedures.
- g) Trustees: Newly appointed Board Members receive a "Board Member's Training" package that includes the Code of Ethical Conduct and a DVD presentation regarding board members' duties and responsibilities, as well as other topics. The package also includes an attestation form pursuant to which Board Members are required to attest to reviewing the training and agree to abide by our Code of Ethical Conduct and compliance policies within 30 days of appointment.

- h) Vendors: Generally, vendors are contractually obligated to comply with any and all pertinent laws, HIPAA, compliance training, performance metrics, warranties, health and background screening, and agree to work in conjunction with the facility/entity they are servicing in order to ensure that proper orientation is provided to all vendor representatives providing services. Orientation may include, without limitation, applicable policies and procedures, security protocols, and HIPAA training. Applicable vendors receive, as part of their onboarding, a service agreement that conveys Northwell Health's expectations related to their commitment and compliance with all federal and state health care program requirements, as well as with Northwell Health's policies and procedures. In addition, applicable vendors receive Northwell Health's Business Associate Agreement and Master Terms & Conditions which include information related to confidentiality, debarment, disclosure of protected health information and vendor screening.
- i) Voluntary Physicians: Voluntary Physicians applying for privileges at Northwell Health receive training on compliance and other mandatory topics via the Northwell Health public website at <https://www.northwell.edu/support-and-resources/healthcare-professional-resources/physician-orientation-materials>. Voluntary physicians are required to review all of Northwell Health's compliance policies prior to their credentialing. Voluntary physicians attest that they have completed the training and read and reviewed the Code of Ethical Conduct and compliance policies. The signed attestation form is submitted with their initial appointment application.
- j) Students: Each educational institution that has a signed educational affiliation agreement with Northwell Health will ensure that their students complete the Student Compliance/HIPAA training program provided and validated by Northwell Health, available on-line at: <https://www.northwell.edu/research-and-education/continuing-and-professional-education/graduate-clinical-education>.
- k) The educational institution will ensure that all faculty and participants have been trained in and will comply with all applicable federal, state and local laws and regulations governing the confidentiality of Northwell Health's medical records, including the confidentiality and disclosure requirements of New York State statutes and regulations concerning HIV/AIDS-related information as well as the federal Health Insurance Portability and Accountability Act of 1996 ("HIPAA") and the Health Information Technology for Economic and Clinical Health Act and the regulations promulgated by HHS thereunder ("HITECH").
- l) Registered Nurses and Advanced Practice Nursing Students who provide direct patient care or patient-related services will complete the Compliance/HIPAA training program provided and validated by Northwell Health, available on-line at: <https://www.northwell.edu/research-and-education/continuing-and-professional-education/institute-nursing/external-nursing-education>.
- m) Upon completion of the training, each Student will sign the attestation form and give copies to his/her program clinical coordinator who will include this in the "student

package” currently being sent to site preceptors. The site preceptor will not accept the Student unless the attestation documents are received prior to commencing the clinical training.

2. Annual Training

- a) Corporate Compliance, in collaboration with the Human Resources Department, provides the Mandatory Annual Compliance Training Program (the “Compliance Training Program”) to employees of Northwell Health and applicable contractors. The training provides information about compliance issues, expectations and the operation of the Compliance Program.
- b) Employees and Applicable Contractors: Employees shall certify that they have received, reviewed, and will comply with the Code of Ethical Conduct and related compliance policies during the Compliance Training Program.
 - i. Employees and applicable contractors are expected to complete the training and education during a timeframe specified by Human Resources.
 - ii. Department/unit managers are responsible for ensuring that their respective employees complete the Compliance Training Program annually within the timeframe established by Northwell Health.
 - iii. Employees and applicable contractors who do not satisfactorily complete the Compliance Training Program within the established timeframe may be subject to disciplinary action, up to and including termination of employment.
 - iv. Alternative training (e.g., classroom sessions, paper) may be available for specific employees, as necessary or appropriate.
 - v. Northwell Health’s Human Resources Department shall log and track the completion of the Compliance Training Program by Northwell Health’s employees and certain contractors, as applicable.
- c) Volunteers: Volunteers shall certify that they have received, reviewed, and will comply with the Code of Ethical Conduct and related compliance policies during the Compliance Training Program. Volunteers receive the same annual training that Northwell Health employees receive.
- d) Trustees: Board Members complete Mandatory Trustee Compliance Education annually. There are two options for Board Members to complete the training requirement. Board Members may attend a live education training or complete an independent learning program. Once either training is complete, Board Members certify that they completed the training. The Office of Corporate Compliance logs and tracks the completion of the Mandatory Trustee Compliance Education by the Northwell Health Board of Trustees and other applicable Northwell Health affiliated boards. Board Members also certify that

they have received, reviewed, and will comply with the Code of Ethical Conduct and related compliance policies during annual mandatory compliance training.

- e) Vendors: Applicable vendors receive a mailing each year that educates them on the Deficit Reduction Act of 2005. Included in the mailing is Northwell Health's policy on detecting and preventing fraud, waste, abuse and misconduct and a link to Northwell Health's policy on gifts and interactions with industry.
- f) Voluntary Physicians: Voluntary physicians receive annual training on compliance and other mandatory topics via the Northwell Health public website at <https://www.northwell.edu/support-and-resources/healthcare-professional-resources/physician-orientation-materials>. Voluntary Physicians also certify that they have received, reviewed, and will comply with the Code of Ethical Conduct and related compliance policies during annual mandatory compliance training.
- g) Students: Due to the limited duration of student internships, students will not be required to receive annual compliance training, but will receive applicable training prior to their onboarding.

3. Periodic Training/Other Training

- a) Periodic specialized and/or targeted training and education is provided to applicable individuals throughout the year based on identified risks.
- b) Compliance awareness and education also occurs throughout the year through such communication tools as email notices, letters, screensavers, and specialized compliance training based upon the employee or individual's job responsibilities.

4. Training Documentation

- a) Employees: Evidence of the delivery of training is maintained by Northwell Health's Human Resources Department and is readily available upon request.
 - i. Northwell Health's Human Resources Department maintains a follow-up process for the employees that do not complete Mandatory Annual Compliance Training.
 - ii. Proof of completion of the Compliance Training Program is maintained electronically through Northwell Health's Learning Management System, or on paper within the employee's personnel file or comparable department file.
 - iii. Confirmation of completion of the Compliance Training Program through alternative training methods will be documented by training facilitators and organization administrators.
- b) Applicable Contractors: Evidence of the delivery of training will be maintained by Northwell Health's Human Resources Department and be readily available upon request.

- c) Volunteers: Evidence of the delivery of training is maintained by each facility's Volunteer Services Department.
- d) Trustees: Evidence of the delivery of training is maintained by Corporate Compliance.
 - i. The Office of Trustee Relations and Corporate Compliance maintain a follow-up process for Northwell Health's Trustees that do not complete the annual compliance training.
 - ii. Proof of completion of the Compliance Training Program is maintained by Corporate Compliance.
- e) Vendors: The Office of Corporate Compliance maintains a listing of all Vendors that receive our Deficit Reduction Act mailing annually. The Office of Procurement and/or applicable business units retain copies of vendor contracts which set forth applicable compliance expectations and requirements.
- f) Voluntary Physicians: Evidence of the delivery of training is maintained by the Credentialing Office.
 - i. The Credentialing Office logs and tracks the completion of training by the Voluntary Physicians.
- g) Students: Evidence of training is maintained by the student's site preceptor and/or the business unit that is responsible for the clinical training of the student.

5. Training Content

- a) Corporate Compliance, in collaboration with the Human Resources Department and content stakeholders, annually reviews the Compliance Training Program's training content and revises it as needed.
- b) Compliance training and education will be in plain English and at a level readily understandable by Affected Individuals.
- c) The Compliance Training Program provides training on topics that may include, but not be limited to, the following subjects:
 - i. Code of Ethical Conduct
 - ii. Elements of a Compliance Program
 - iii. The Deficit Reduction Act of 2005
 - iv. Health Insurance Portability and Accountability Act (HIPAA)
 - v. Compliance issues in the following areas:
 - 1. Billings
 - 2. Payments

3. Medical necessity and quality of care
4. Governance
5. Mandatory reporting
6. Credentialing, and
7. Other risk areas identified by Northwell Health

6. Training of Applicable Joint Ventures and Partnerships

Joint ventures where we hold a majority interest or entities where Northwell Health has been engaged in a professional capacity to provide and/or render compliance services, shall provide new hires with compliance education and training within 30 days of start date and annually thereafter. Evidence of delivery of training and proof of completion of training shall be maintained by the applicable joint ventures and partnerships.

REFERENCES to REGULATIONS and/or OTHER RELATED POLICIES

- Northwell Health Policy# 800.00 Corporate Compliance Program
- Northwell Health Policy# 100.32 Educational Affiliations
- Northwell Health’s Code of Ethical Conduct
- New York State Social Services Law Section 363-d
- Title 18 New York Codes of Rules and Regulations Part 521
- OMIG Compliance Program Review Guidance
- Human Resources Policy Part 4-Section 4 Annual Mandatory Compliance Training Program

CLINICAL REFERENCES/PROFESSIONAL SOCIETY GUIDELINES

N/A

ATTACHMENTS

N/A

FORMS

N/A

APPROVAL:	
Northwell Health Policy Committee	03/29/18
System PICG/Clinical Operations Committee	4/19/18

Standardized Versioning History:

*= Northwell Health Policy Committee Approval; ** =PICG/Clinical Operations Committee Approval