

Title: Compliance: Mandatory Compliance Training and Education		
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Approved by: Administrative Policy Committee, Chief Legal Officer/General Counsel, PolicyTech Administrators		
Discrete Operating Unit/Facility: Banner Baywood Medical Center Banner Behavioral Health Hospital Banner Boswell Medical Center Banner Casa Grande Medical Center Banner Churchill Community Hospital Banner Del E Webb Medical Center Banner Desert Medical Center Banner Estrella Medical Center Banner Fort Collins Medical Center Banner Gateway Medical Center Banner Goldfield Medical Center Banner Heart Hospital Banner Ironwood Medical Center Banner Lassen Medical Center Banner Ocotillo Medical Center Banner Payson Medical Center Banner Thunderbird Medical Center Banner--University Medical Center Phoenix Banner--University Medical Center South Banner--University Medical Center Tucson East Morgan County Hospital McKee Medical Center North Colorado Medical Center Ogallala Community Hospital Page Hospital Platte County Memorial Hospital Sterling Regional Medical Center Torrington Community Hospital Washakie Medical Center Wyoming Medical Center		Banner Corporate Ambulatory (Outpatient) Services Banner Health Clinics Banner Imaging Services Banner Imaging Services Colorado Banner MD Anderson Cancer Center Banner Sleep Center Banner Surgery Centers Banner Urgent Care Services Occupational Health/Employee Health Services Rural Health Clinics Banner Home Care and Hospice (BHCH) Banner Pharmacy Services Insurance Banner Health Network Banner Plan Administration Banner University Health Plan Post Acute Services (PAC) Research

I. Purpose/Population

A. Purpose:

To establish requirements for mandatory Compliance Training and Education for Banner Health (Banner).

B. Population: All Covered Persons.

II. Definitions:

A. Compliance Training: Compliance courses, including the Code of Conduct, that the Ethics & Compliance Department assigns to Covered Persons for completion, including, but not limited to, any courses mandated by the U.S. Department of Health and Human Services Office of Inspector General (OIG) or Centers for Medicare and Medicaid Services (CMS).

B. Corporate Integrity Agreement (CIA): A five-year agreement that Banner entered into on April 9, 2018 with the U.S. Department of Health and Human Services Office of Inspector General (OIG) as part of a settlement with the Department of Justice.

C. Covered Persons: Includes:

1. Board of Directors (Board Members);
2. All full-time and part-time employees (including employed physicians) of Banner and of any discrete operating unit owned, operated, or controlled by Banner except those subsidiaries, affiliates or units owned, operated, or controlled by Banner where the compliance function has been assigned to another entity. (Employees);
3. All volunteers of Banner and of any discrete operating unit owned, operated, or controlled by Banner except those subsidiaries, affiliates or units owned, operated, or controlled by Banner where the compliance function has been assigned to another entity. (Volunteers);
4. All Contractors, subcontractors, agents, and other persons/entities who provide patient care items or services or perform billing or coding functions on behalf of Banner or of any discrete operating unit owned, operated, or controlled by Banner except those subsidiaries, affiliates or units owned, operated, or controlled by Banner where the compliance function has been assigned to another entity. (Vendors);
5. All physicians and other non-physician practitioners who are credentialed providers at the 12 hospitals named in the CIA¹ (Providers);
6. Notwithstanding the above, Covered Persons may not include part-time or per diem employees, contractors, subcontractors, agents, and other persons who are not reasonably expected to work more than 160 hours during a Reporting Period (April 9 – April 8), except that any such individuals shall become “Covered Persons” at the point when they work more than 160 hours; and
7. Other categories as required by the Ethics & Compliance Department or by law or regulation.

D. MyHR | Workday Learning: Learning management system that administers, documents, tracks, reports, and delivers education courses, training programs, and other learning events.

¹ The 12 hospitals are Banner Baywood Medical Center, Banner Heart Hospital, Banner Boswell Medical Center, Banner Del. E. Webb Medical Center, Banner Desert Medical Center, Banner Estrella Medical Center, Banner Gateway Medical Center, Banner University Medical Center Phoenix, Banner Ironwood Medical Center, Banner Thunderbird Medical Center, North Colorado Medical Center, and McKee Medical Center.

- E. Specialized Compliance Training: Training focused on certain job functions or specific compliance risks, such as, coding, billing, cost reporting, and referral source arrangements. This may include remedial training as the result of compliance audits or investigations.

III. Policy:

- A. Banner provides Compliance Training to Covered Persons, and others as required by the Ethics & Compliance Department, upon hire and annually thereafter, or as necessary and appropriate for them to carry out their job functions.
- B. Depending on job functions, Covered Persons and others as required by the Ethics & Compliance Department may be required to complete Specialized Compliance Training in addition to the standard Compliance Training.
- C. Compliance Training is delivered through a variety of methods, including, but not limited to, live sessions, online modules, pre-recorded videos, and written documents.
- D. Compliance Training is assessed on an ongoing basis with identified updates incorporated during an annual review of the content. Updated content is provided to Banner employees as part of their initial or annual Compliance Training.
- E. Covered Persons must complete Compliance Training based on the following schedule:
 - 1. Initial Training: Sixty (60) days for Employees & External Contract Labor and Ninety (90) days for all other Covered Persons.
 - 2. Annual Training: Ninety (90) days
 - 3. Employees on a leave of absence must complete their training within thirty (30) days of their return from leave.
 - 4. Covered Persons who return to Banner after leaving employment, becoming inactive as volunteers, resigning their privileges, or after ending their contractual relationships with Banner may be required to complete the initial training upon their return.
- F. The Ethics & Compliance Department may adjust the Compliance Training timelines based on the needs of the organization (e.g. National and/or State emergencies).
- G. If a Covered Person fails to complete Compliance Training within the prescribed time periods, they may be subject to appropriate corrective actions.
 - a. For Banner Employees:
 - i. Leaders must consider the timely completion of Compliance Training in their Employees' performance reviews.
 - ii. Leaders should work with their HR partners to impose corrective action on Employees who do not complete Compliance Training within the prescribed time frames.
- H. Covered Persons who experience issues with completing Compliance Training should contact the appropriate department for assistance in accordance with **Appendix A**.
- I. Training records will be retained for ten (10) years or as otherwise mandated by Federal or State law, regulations, or guidance.

IV. Procedure/Interventions:

- A. Banner Employees and External Contract Labor:
 - 1. Compliance Training is provided through MyHR | Workday.

2. Leaders should arrange to receive periodic reports from MyHR | Workday Learning to monitor their Employees' completion of Compliance Training.

B. The Board of Directors, Vendors, Volunteers, and Non-Employed Providers:

1. Compliance Training is provided directly from the Ethics & Compliance Department.
2. The Ethics & Compliance Department, in consultation with applicable leaders, will follow up with any Board Member, Provider, Vendor, or Volunteer who does not complete Compliance Training.

C. Students:

1. Compliance Training is provided through the myClinicalExchange learning platform.
2. The Ethics & Compliance Department, in consultation with the Banner Health Careers Department, will follow up with any students who do not complete Compliance Training.

V. Procedural Documentation:

A. N/A

VI. Additional Information:

A. N/A

VII. References:

A. N/A

VIII. Other Related Policies/Procedures:

- A. HIPAA Privacy and Security Mandatory Training (#13879)
- B. CP 5003 New Employee Orientation and Ongoing Training
- C. CP 5025 Training Material Preparation Documentation and Tracking
- D. CP 5026 Systemwide Mandatory Training

IX. Keywords and Keyword Phrases:

- A. Accreditation Commission for Health Care (ACHC)
- B. Compliance education
- C. Compliance training
- D. Annual training
- E. Code of Conduct
- F. Covered Person
- G. Corporate Integrity Agreement
- H. Leave of Absence
- I. Utilization Review Accreditation Commission (URAC)

X. Appendix:

A. Appendix A: Training Contacts

APPENDIX A
Training Contacts

- Instructions to log in to MyHR | Workday and additional resources are available at <http://intranet.bhs.bannerhealth.com/bhsystem/departments/human+resources/myhr20?/> which addresses such things as:
 - Enrolling in courses
 - Canceling enrollment
 - Viewing completed courses

- Running reports
- Managing roster
- Delegate access
- Accessing transcripts
- Manager view

- The HR learning team at bannerlearningcenter@bannerhealth.com may be contacted for technical issues, including, but not limited to:
 - Course assignments
 - Analytics
 - Security for advanced learning roles

- The Ethics & Compliance Department at bannerhealthcompliance@bannerhealth.com may be contacted for questions regarding training content and who needs to be trained under the CIA.