

**\*\*\*\*\*Mandatory Banner Health CIA Compliance Training\*\*\*\*\***

Dear Banner Vendor,

This is to inform you that Banner has entered into a five-year Corporate Integrity Agreement (CIA) with the U.S. Department of Health and Human Services Office of Inspector General (OIG). Under the CIA, Banner is required to provide compliance training to certain Covered Persons, which includes contractors, subcontractors, agents, and other persons who furnish patient care items or services or who perform billing or coding services on behalf of Banner.

***We have identified you as a Covered Person.*** For this reason, you have been assigned Banner's mandatory compliance training and have access to applicable policies and procedures.

### **TRAINING DETAILS**

Banner has developed a course that is approximately 45 minutes and covers (1) Banner's Compliance Program, (2) Banner's CIA requirements, and (3) applicable Federal health care program requirements.

#### Course Syllabi:

- Section 1- Course Objectives
- Section 2- Banner's Compliance Program
- Section 3- Applicable Laws and Regulations
- Section 4- Potential Risk Areas
- Section 5- Banner's Corporate Integrity Agreement (CIA)
- Section 6- Attestation

**Please Note:** You must complete the attestation at the end of the course in order to receive credit.

***This course must be completed as part of your VendorMate credentialing process.*** You will receive four (4) email reminders to complete the course.

### **TRAINING TIMELINE**

#### Initial Training:

Every quarter, the Banner Learning Center (BLC) will assign Compliance Training to new Vendors that begin working for Banner. Compliance Training must be completed within twenty-one (21) days of being assigned.

#### Annual Training:

The BLC will assign Compliance Training to existing Vendors on October 1 of each year. Compliance Training must be completed within ninety (90) days of being assigned.

#### Track Completion of Compliance Training:

The Ethics & Compliance Department receives periodic reports from the BLC that allows it to monitor training completion of Vendors.

### **POLICIES & PROCEDURES**

Some of Banner's policies & procedures can be accessed at any time through the BLC and/or external vendor website:  
<https://www.bannerhealth.com/about/vendors>

The policies that address the operation of Banner's Compliance Program (including the requirements outlined in Banner's CIA) and Banner's compliance with Federal health care program requirements include:

- Banner's Code of Conduct
- Compliance: 60 Day Report/Repay Overpayment
- Compliance: Acceptance of Items from Outside Business Associates
- Compliance: Basic Requirements for Third Party Billing; Prohibited Billing Practices
- Compliance: Corporate Integrity Agreement (CIA) Notification Requirements
- Compliance: ComplyLine
- Compliance: Federal and State Exclusion Review
- Compliance: Mandatory Compliance Training and Education
- Compliance: Program Obligations
- Compliance: Reporting and Investigating Potential Compliance Issues
- Prohibition Against Retaliation for Protected Activities

## **BLC LOGIN INFORMATION**

### **Upcoming Action Items!**

- You will receive an independent email from the BLC that provides you with a unique link and instructions on how to set-up your training profile.
- You will be required to change your password once you have logged in for the first time. Please save your Username and Password as you will need them to access Banner courses and policies and procedures in the future.
- Upon conclusion of the training course, you will receive a *Certificate of Completion*. Please provide this document to VendorMate as proof of course completion.

## **TRAINING CONTACTS**

- Instructions to log in to the BLC and additional resources are available at <http://learning.bannerhealth.com/>
- The BLC at [bannerlearningcenter@bannerhealth.com](mailto:bannerlearningcenter@bannerhealth.com) should be contacted for all technical issues.
- The Ethics & Compliance Department at [bannerhealthcompliance@bannerhealth.com](mailto:bannerhealthcompliance@bannerhealth.com) should be contacted for questions regarding training content and who needs to be trained under the CIA.

Thank you for your attention regarding this important training!

Sincerely,

David M. Ledbetter  
Vice President, Ethics & Compliance