

Title: Compliance: Mandatory Compliance Training and Education	
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Approved by: Administrative Policy Committee, Chief Legal Officer/General Counsel, PolicyTech Administrators 05/29/2019	
<p>Discrete Operating Unit/Facility: Banner Baywood Medical Center Banner Behavioral Health 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 Community Hospital East Morgan County Hospital McKee Medical Center North Colorado Medical Center Ogallala Community Hospital Page Hospital Platte County Memorial Hospital Sterling Regional MedCenter Washakie Medical Center</p>	<p>Banner Corporate</p> <p>Ambulatory Services Banner Health Clinics Banner MD Anderson Cancer Center Banner Imaging Services Banner Surgery Centers Banner Urgent Care Centers B—UMCP Sleep Center Occupational Health/Employee Services Rural Health Clinics</p> <p>Banner Home Care and Hospice</p> <p>Insurance Banner Health Network Banner Plan Administration University Physicians Health Plans</p> <p>Banner Pharmacy Services</p> <p>Post-Acute Care Services</p> <p>Research</p>

I. Purpose/Population

A. Purpose:

1. To establish mandatory Compliance Training and Education for Banner Health (Banner) and to comply with the requirements of Banner's Corporate Integrity Agreement (CIA).
2. To provide guidance on how the Banner Learning Center (BLC) is utilized for Compliance Training.

B. Population: All Employees.

II. Definitions:

A. Banner Learning Center (BLC): Learning management system that administers, documents, tracks, reports, and delivers education courses, training programs, and other learning events.

B. Compliance Training: Compliance courses 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). Compliance Training also includes annually providing the Code of Conduct to Covered Persons.

C. Corporate Integrity Agreement (CIA): A five-year agreement that Banner entered into on April 9, 2019 with the OIG as part of a settlement with the Department of Justice.

D. 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); and
6. Other categories as required by the Ethics & Compliance Department or by law or regulation.

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:

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.

- A. Banner provides Compliance Training to Covered Persons as necessary and appropriate for them to carry out their job functions.
- B. Compliance Training is delivered through a variety of methods, including, but not limited to, live sessions, online modules, pre-recorded videos, and written documents.
 - 1. Banner provides its online modules through the BLC, which can be accessed from any compatible personal computer or tablet with internet access.
- C. Covered Persons must complete Compliance Training within the time frames specified in Section IV.
 - 1. Covered Persons are assigned and must complete initial training again, if they return to Banner after leaving employment, becoming inactive as volunteers, resigning privileges, or ending contractual relationships with Banner.
 - 2. Covered Persons on leave of absence must complete their annual training within thirty (30) days of their return from leave.
 - 3. If a Covered Person fails to complete Compliance Training within the prescribed time periods, they may be subject to appropriate corrective action or sanctions.
- D. Covered Persons who experience issues with completing Compliance Training should contact the appropriate department for assistance in accordance with **Appendix A**.
- E. 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. **Board of Directors**
 - 1. **Assign Compliance Training: (Ethics & Compliance Department)**
 - a. The Ethics & compliance Department provides customized Compliance Training to board Members and requires completion within a specified period of time (usually 30 days).
 - 2. **Track Completion of Compliance Training: (Ethics & Compliance Department)**
 - a. The Ethics & Compliance Department follow up with any Board Member who does not complete Compliance Training by the due date(s).
- B. **Employees**
 - 1. **Assign Compliance Training: (BLC)**
 - a. Initial Training: The BLC assigns Compliance Training to Employees when they begin working for Banner. Compliance Training must be completed within sixty (60) days of being assigned, or it will show up as “past due” on the BLC reports.
 - b. Annual Training: The BLC assigns Compliance Training to Employees on May 1 of each year. Compliance Training must be completed within ninety (90) days of being assigned, or it will show up as “past due” on the BLC reports.
 - 2. **Track Completion of Compliance Training: (Leaders)**
 - a. Leaders should arrange to receive periodic reports from the BLC to allow them to monitor Employees’ completion of Compliance Training.
 - b. Leaders should impose corrective action on Employees who do not complete Compliance Training within the prescribed time frames.
 - c. Leaders must consider the completion of Compliance Training in their Employees’ performance reviews.
- C. **Volunteers (CIA required training only)**

1. **Assign Compliance Training:**
 - a. **Initial Training: (Volunteers or Volunteer Coordinators)**
 - i. Depending on the facility, Volunteers or Volunteer Coordinators use specific criteria established by the BLC to self-enroll Volunteers in Compliance Training. Compliance Training must be completed within twenty-one (21) days of being assigned, or it will show up as “past due” on the BLC reports.
 - ii. Volunteer Coordinators may also conduct live Compliance Training for Volunteers. Completion of Live Compliance Training must be entered into the BLC for tracking purposes.
 - b. **Annual Training: (BLC)**
 - i. The BLC assigns Compliance Training to Volunteers on May 1 of each year. Compliance Training must be completed within ninety (90) days of being assigned, or it will show up as “past due” on the BLC reports.
 - ii. Volunteer Coordinators may also conduct live Compliance Training for Volunteers. Completion of live Compliance Training must be entered into the BLC for tracking purposes.
 2. **Track Completion of Compliance Training: (Volunteer Coordinators)**
 - a. Volunteer Coordinators should arrange to receive periodic reports from the BLC to allow them to monitor Volunteers’ completion of Compliance Training.
 - b. Volunteer Coordinators must remove Volunteers from the volunteer scheduled if they do not complete Compliance Training within the prescribed time frames.
- D. **Vendors (CIA required training only)**
1. **Assign Compliance Training: (BLC)**
 - a. **Initial Training:**
 - i. Every quarter, the BLC assigns Compliance Training to Vendors that begin working for Banner. Compliance Training must be completed within twenty-one (21) days of being assigned, or it will show up as “past due” on the BLC reports.
 2. **Annual Training:**
 - a. The BLC assigned Compliance Training to Vendors on August 1 of each year. Compliance Training must be completed within ninety (90) days of being assigned, or it will show up as “past due” on the BLC reports.
 3. **Track Completion of Compliance Training: (Ethics & Compliance Department)**
 - a. The Ethics & Compliance Department receives periodic reports from the BLC that allows it to monitor the completion of Compliance Training by Vendors.
 - b. The Ethics & Compliance Department, in consultation with the Legal Department, may sanction Vendors who do not complete Compliance Training in accordance with governing contract terms or as required by law.
- E. **Providers (CIA required training only)**
1. **Assign Compliance Training: (BLC)**
 - a. **Initial Training:**
 - i. Every quarter, the BLC assigns Compliance Training to Providers after they are first credentialed at one or more of the Covered Facilities. Compliance Training must be completed within twenty-one (21) days of being assigned, or it will show up as “past due” on the BLC reports.
 - b. **Annual Training:**
 - i. The BLC assigns Compliance Training to Providers on May1 of each year. Compliance Training must be completed within ninety (90) days of being assigned, or it will show up as “past due” on the BLC reports.
 2. **Track Completion of Compliance Training: (Ethics & Compliance Department)**

- a. The Ethics & Compliance Department receives periodic reports from the BLC that allows it to monitor the completion of Compliance Training by Providers.
- b. The Ethics & Compliance Department, in consultation with Medical Staff Services, may follow up with any Providers who do not complete Compliance Training within the prescribed time frames.

F. Specialized Training

1. All Covered Persons may be required to complete Specialized Training in addition to Compliance Training. Specialized Training must be completed within the specified timeframe, and failure to complete the training may result in corrective action or sanctions.

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)

IX. Keywords and Keyword Phrases:

- A. Compliance education
- B. Compliance training
- C. Annual training
- D. Code of Conduct
- E. Covered Person
- F. Corporate Integrity Agreement
- G. Leave of Absence

X. Appendix:

- A. Appendix A: Training Contacts

APPENDIX A
Training Contacts

- Instructions to log in to the BLC and additional resources are available at <http://learning.bannerhealth.com/>, which addresses such things as the following:
 - Enrolling in courses
 - Canceling enrollment
 - Viewing completed courses
 - Running reports
 - Managing roster
 - Delegate access
 - Accessing transcripts
 - Manager view

- The BLC at bannerlearningcenter@bannerhealth.com may be contacted for technical issues, including, but not limited to:
 - Access issues (including username)
 - Browser issues
 - Course assignments
 - Password resets
 - System compatibility issues

- 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.