

NOYES HEALTH  
CORPORATE COMPLIANCE POLICY/PROCEDURE

SUBJECT: Corporate Compliance Education  
EFFECTIVE DATE: September, 2013  
TJC REF: None

POLICY: CC-03  
ISSUED BY: Administration  
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Noyes Health will communicate its ethical expectations, compliance standards and procedures to all officials, managers, employees, physicians, and major independent contractors. Training will include statutory compliance information required under the Deficit Reduction Act, as well as the Corporate Compliance Plan, the Code of Ethical Conduct, Health Insurance Portability and Accountability Act (HIPAA), a summary of fraud and abuse laws, and relevant (job specific) policies and procedures.

All new employees, physicians, volunteers, members of the Board of Directors, and major contractors will receive initial compliance training as part of their general and/or departmental orientation program. Department-level compliance policies will be distributed during department orientation and training. As new developments or concerns arise, the Corporate Compliance Officer may require additional training for some or all employees.

Additional specific training may be determined based on employee job functions. The Corporate Compliance Officer will work with respective managers/supervisors to determine training needs/expectations and develop the educational content.

Adherence to the provisions of the Corporate Compliance Plan, including attendance and completion of compliance training, will be a factor in each employee's annual performance evaluation. Failure to attend and participate in compliance training may be grounds for disciplinary action, including termination of employment.

Originated: 4/03

Revised: 3/05, 3/06, 7/09, 2/12, 9/12, 9/13

POL:CORPCOMPL

Committee Approval: Corporate Compliance Committee

Distribution: Original - Administration; Copy - Via Meditech

Signature: \_\_\_\_\_

*Amy Pollard*

Date: \_\_\_\_\_

*9/17/13*