
Subject	Compliance Plan and Standards of Conduct Education
Index Number	GB-3006
Section	Compliance and Ethics
Subsection	General
Category	Corporate
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References

Office of Inspector General Program Guidance for Hospitals

Applicable To

All employees of Memorial Hospital of Boscobel d/b/a Gundersen Boscobel Area Hospital & Clinics a Gundersen Health System affiliate hereafter referred to as "Gundersen Boscobel".

Detail

A critical element of Gundersen Boscobel's Compliance Program is effective communication of the *Compliance Plan and Standards of Conduct* to all employees and staff of Gundersen Boscobel. It is the policy of Gundersen Boscobel that each newly hired employee, resident, student and volunteer shall receive a copy of the *Compliance Plan and Standards of Conduct* at the next available monthly Sessions training which is part of the orientation process for new employees. All existing employees, medical and associate staff, residents, students, and volunteers shall receive education on the *Compliance Plan and Standards of Conduct* on an annual basis.

Implementation

The Director of Compliance/Compliance Officer, or his/her designee, is responsible for developing the Compliance Plan and Standards of Conduct curriculum so that all employees, residents, students and volunteers are effectively educated on the Compliance Plan and Standards of Conduct.

1. Compliance Plan and Standards of Conduct education, at a minimum, will include information on the following aspects of the Compliance Program:
 - Purpose of the Compliance Program;
 - Identification of the Vice President, Compliance and the Director of Compliance/Compliance Officer for the Gundersen Regional Hospital Affiliates;
 - Review of the Standards of Conduct;
 - Communication channels (Hotline);
 - Expectations for reporting compliance concerns;
 - Non-retaliation Policy;
 - Medicare Compliance (Fraud, Waste and Abuse); Information regarding the False Claims Act and other information as required pursuant to the Deficit Reduction Act of 2005; and
 - Acceptance of gifts.

2. Educational materials will be developed to facilitate compliance education and to ensure that a consistent message is delivered to all employees.
3. Educational materials will be standardized to evidence that everyone attending a compliance education session receives the same instruction.
4. Employees will be provided with the opportunity to seek clarification or more information on any aspect of the Compliance Program.
5. Attendance by new employees will be monitored through the signing of the acknowledgement card located in the *Compliance Plan and Standards of Conduct* booklet. New employees who fail to attend a compliance education session will be reported to Human Resources, and they will ensure that such employees complete the required mandatory education.
6. Attendance by current employees will be monitored electronically when such education is offered through a computer-based program, or may, if necessary, be monitored by attendance rosters and/or ID badge swiping if the education is presented in an auditorium setting.
7. Each member of the Board of Directors will be educated annually on the Compliance Program when the Director of Compliance/Compliance Officer presents the Annual Report of Compliance Activities.
8. The Director of Compliance/Compliance Officer, or his/her designee, is responsible for submitting periodic reports to the Compliance Operations Committee and the Board of Directors regarding the Compliance Plan and Standards of Conduct education.