
Subject	Compliance Plan and Standards of Conduct Education
Index Number	GL-3006
Section	Compliance and Ethics
Subsection	General
Category	Corporate
Contact	Adank, Kari B
Last Revised	4/9/2014

References

Office of the Inspector General Program Guidance for Hospitals.

Applicable To

All employees of Gundersen Lutheran Health System, Inc. and its affiliates including Gundersen Clinic, Ltd., Gundersen Lutheran Medical Center, Inc. and Gundersen Lutheran Administrative Services, Inc. (collectively "Gundersen").

Detail

A critical element of Gundersen's Compliance Program is effective communication of the Compliance Plan and Standards of Conduct. It is the policy of Gundersen that each newly hired employee, resident, student and volunteer receive a copy of the Compliance Plan and Standards of Conduct and attend, on their effective date of employment, a Compliance Program and Standards of Conduct education session which is part of the orientation process for new employees. Beginning in 2004, all existing employees, residents, students, and volunteers shall receive education on the Compliance Plan and Standards of Conduct on an annual basis.

Implementation

The Chief 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:
 - a. Purpose of the Compliance Program;
 - b. Identification of the Chief Compliance Officer;
 - c. Review of the Standards of Conduct;
 - d. Communication channels (Hotline);
 - e. Expectations for reporting compliance concerns;
 - f. Non-retaliation Policy;
 - g. 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
 - h. Acceptance of gifts.
2. Educational materials will be developed to facilitate effective 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 Recruitment, 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 Governors and Board of Trustees will be educated annually on the Compliance Program when the Chief Compliance Officer presents the Annual Report of Compliance Activities.
8. The Chief Compliance Officer, or his/her designee, is responsible for submitting periodic reports to the Compliance Oversight Committee, the Board of Governors and Board of Trustees regarding the Compliance Plan and Standards of Conduct education.