

THE CENTER FOR DISCOVERY

SUBJECT: Compliance Education and Training

MANUAL: Corporate Compliance

SECTION: Section 3

Purpose:

The development and implementation of regular, effective education and training seminars for affected individuals is an integral part of the compliance program. All employees will receive an introduction to the Center for Discovery's Corporate Compliance program at orientation and then annually thereafter. All members of the Board of Directors will be trained on the CFD Corporate Compliance program annually. All interns will be trained on the Corporate Compliance plan and program upon entry. All contractors, vendors, and any other agents will be directed to the CFD website to review the Corporate Compliance Handbook which contains the entire Corporate Compliance plan and trainings

Policy:

1. All affected individuals will receive training related to the organization's overall compliance program.
2. All employees in identified risk areas, including members of the Board of Directors, will receive more detailed education related to their function and responsibilities.
3. All affected individuals, to include vendors and contractors will be directed to the CFD website
4. Completion of this training is mandatory and is a condition of continued employment or a condition of maintaining a business relationship with CFD.

Procedure:

1. The Compliance Officer is responsible for developing the compliance education curriculum and monitoring and ensuring that compliance training and orientation meet the policy standards on this subject.
2. Compliance education trainings include an explanation of the structure and operation of the compliance program and they will introduce the Compliance Officer to the organization.
3. Compliance education trainings, at a minimum, will include information on the following aspects of the compliance program:
 - a. Code of Conduct and other related written guidance;
 - b. Identity and function of the Corporate Compliance Officer
 - c. An overview of the eight element of the corporate compliance program
 - d. False Claims Act;

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- e. Communication channels (Corporate Compliance Hotline);
 - f. Organizational expectations for reporting problems and concerns; and
 - g. Non Intimidation and Non-retaliation policy.
 - h. Where to access the Corporate Compliance plan, policies and procedures which make up the Corporate Compliance Handbook on the Agency Discovernet Homepage and on the website
4. Comprehensive education materials have been developed to facilitate the compliance sessions and ensure that a consistent message is delivered to all affected individuals . Education protocols and materials are standardized, so that everyone receiving this training receives the same instruction.
 5. As part of his or her initial orientation, each employee/intern /volunteer shall receive a training session within the first thirty (30) days of employment. During orientation, employees will provided with a copy of the Code of Conduct
 6. Within the Corporate Compliance Training each employee/intern /volunteer will receive an introduction to The Center for Discovery’s compliance program and objectives and the information as listed above. Individuals will also be instructed how to access the Corporate Compliance Plan on the CFD website. Each new employee/intern /volunteer will sign an acknowledgement that they have received this training.
 7. All existing employees will receive a training session at least once per year that includes a review of the existing Corporate Compliance Program, the Code of Conduct, and any applicable policies and procedures. The session will also focus on any changes in federal or state laws and regulations.
 8. All education and training relating to the Corporate Compliance Program will be verified by a signed acknowledgement of receipt of training. The Training Department and individual Directors of Services will maintain records of staff compliance training, and ensure continued training as needed.
 9. Training protocols and materials are standardized to ensure that instruction is consistent.
 10. Employees will be provided with the opportunity to seek clarification or more information on any aspect of the compliance program. Trainers who are not able to answer specific questions will arrange for follow-up to be conducted by the Compliance Officer.

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11. Only properly trained individuals will provide compliance education and training. The Compliance Officer is responsible for coordinating with Directors of Services to ensure that specialized compliance education occurs in identified risk areas.
12. Training may also be provided on documentation and other related job-specific areas as needed. Directors of Services shall assist the Compliance Officer in identifying areas that require specific training.
13. Training for the Board of Directors will be conducted annually by the Corporate Compliance Officer. Documentation of these trainings will be maintained in the Board minutes
14. The Corporate Compliance Handbook , which outlines the Corporate Compliance plan to include Code of conduct, code of Business Conduct, all policies and procedures, and training outlines, is available on the Center for Discovery's website <https://thecenterfordiscovery.org/quality-improvement-and-compliance/> It is a requirement of all contractors and vendors to access these policies and indicate, within their contract, that they have an understanding of our compliance plan prior to contract signing and or renewal.

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