

County Of San Diego
Health and Human Services Agency

Chapter: Compliance

Topic: Personnel and Training

Key Words: Contractors, employees, training

SUBJECT: Employee Compliance Training

NO: HHSA-M-3.1

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DATE: September 1, 2004 (Revised)

REFERENCE: 63 FR 8987 (February 23, 1998)
63 FR 70138 (December 18, 1998)
65 FR 59434 (October 5, 2000)

SUPERSEDES: N/A

PURPOSE:

To establish guidelines and requirements for the County of San Diego Health and Human Services Agency compliance training program for HHSA staff and volunteers.

BACKGROUND:

On September 10, 2002, the County of San Diego Health & Human Services Agency ("HHSA") established the Compliance Program. The Compliance Program is structured on the guidance provided by the United States Department of Health and Human Services, Office of the Inspector General in 63 FR.8987 (February 23, 1998), 63 FR 70138 (December 18, 1998), and 65 FR 59434 (October 5, 2000), et al., and is responsible for implementing a Compliance Program to ensure that HHSA services are provided in accordance with all applicable federal, state, and local laws and regulations. An integral part of the Compliance Program is ensuring that employees and volunteers are trained on their duties and responsibilities, and on the resources available to them.

POLICY:

1. All HHSA employees and volunteers shall receive training on the HHSA Compliance Program. At a minimum, training shall address legal and ethical expectations in the workplace, including each employee and volunteer's responsibility to report suspected misconduct.
2. All HHSA employees and volunteers shall receive initial compliance training within sixty (60) days of beginning employment with HHSA.
3. Failure on the part of an HHSA employee to complete compliance training as required may result in disciplinary action, up to and including termination, in accordance with applicable civil service rules.

PROCEDURE:

1. General Compliance Training

- a. The HHSA Compliance Office shall be responsible for developing, implementing, providing, evaluating, tracking and maintaining a compliance-training program for HHSA.
- b. All HHSA employees and volunteers shall receive and complete a minimum of two hours of compliance training per fiscal year.

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- c. New employees shall receive an introduction to HHSA's Compliance Program through HHSA's new employee orientation and shall complete compliance training within sixty (60) days of employment.
- d. Compliance training shall be made available to all volunteers providing services for HHSA within sixty (60) days of their start.
- e. Compliance training shall, at a minimum:
 - i. Address compliance issues common to all HHSA regions, divisions and programs.
 - ii. Include documentation of employee and volunteer participation and completion.
 - iii. Include the following topics:
 - 1. Definition of a Compliance Program;
 - 2. Reasons for, and benefits of, a Compliance Program;
 - 3. Elements of the HHSA Compliance Program and other compliance-related resources within HHSA;
 - 4. HHSA's Code of Conduct and Statement of Incompatible Activities;
 - 5. HHSA policies regarding gifts, favors and other consideration;
 - 6. An explanation of the Compliance Hotline;
 - 7. An explanation of the reporting mechanisms available for employees, including how employees can attempt to resolve problems within existing chains-of-command before utilizing other reporting mechanisms;
 - 8. HHSA's commitment to an environment free from fear of retribution or retaliation. This commitment shall be reinforced throughout each training session;
 - 9. Use evaluation survey forms to measure the effectiveness of the training sessions;

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10. Require that individuals attending training acknowledge, in writing, receipt of HHSA's Code of Conduct and Statement of Incompatible Activities. The Compliance Office shall maintain the acknowledgments in accordance with its record-keeping policies and procedures as described in Policy HHSA-M-2.6;

11. Require that individuals attending training receive written materials that explain in a practical manner what they must do to comply with HHSA compliance program goals.

2. Annual Refresher Training

- a. The Compliance Office shall develop, implement and provide an annual compliance refresher-training program for all employees.
- b. Annual compliance refresher-training shall also be made available to all volunteers providing services for HHSA.
- c. The Compliance Office shall require that individuals attending acknowledge, in writing, receipt of HHSA's annual refresher training. The Compliance Office shall maintain the acknowledgments in accordance with its record-keeping policies and procedures as described in Policy HHSA-M-2.6.

3. Area Specific Technical Training

- a. The Compliance Office shall provide guidance to individual HHSA regions, divisions and programs in developing specific, technical compliance training for those individuals (physicians, nurses, social workers, Health Services Specialists, coders, billers, billing clerks, etc.) who require additional training in their particular areas of expertise.
- b. Each HHSA region, division and program shall develop and maintain documentation of technical area specific training sessions provided, including attendance logs, and shall routinely submit the attendance documentation to the Compliance Office within five (5) business days of the completion of the training.

QUESTIONS/INFORMATION:

Contact the Compliance Office at (619) 515-4244.

ATTACHMENTS:

None

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SUNSET DATE:

This policy will be reviewed for continuance by September 1, 2006.

Approved:

Jean M. Shepard
Director