



<b>DOCUMENT TITLE:</b> Compliance Training and Education	<b>SYSTEM POLICY AND PROCEDURE MANUAL</b>
<b>POLICY #:</b> 800.69	<b>CATEGORY:</b> Compliance and Ethics
<b>System Approval Date:</b> 07/22/2025❖	<b>Origination Date:</b> 04/19/2018
<b>Site Implementation Date:</b> 07/22/2025❖	<b>Previously Reviewed/Approved:</b> 03/2025
<b>Prepared by:</b> Office of Corporate Compliance	<b>Notations:</b> N/A

## GENERAL STATEMENT of PURPOSE

Northwell Health is committed to providing training and education on our Compliance Program. The training provides Affected Individuals with information about compliance issues, Northwell Health expectations and the operations of the Compliance Program. Training and education shall be provided in a form and format accessible and understandable to all Affected Individuals, consistent with Federal and State language and other access laws, rules or policies.

## POLICY

It is the policy of Northwell Health that Affected Individuals are required to receive and complete training and education on a regular basis. Specialized and/or targeted training will also be provided to Affected Individuals on an as-needed basis.

## SCOPE

This policy applies to all Northwell Health employees, as well as medical staff, volunteers, students, trainees, physician office staff, contractors, trustees and other persons performing work for or at Northwell Health; faculty and students of the Donald and Barbara Zucker School of Medicine at Hofstra/Northwell or the Hofstra Northwell School of Nursing and Physician Assistant Studies conducting research on behalf of the Zucker School of Medicine on or at any Northwell Health facility; and any other Affected Individual.

## DEFINITIONS

**Affected Individuals:** “Affected Individuals” is defined as all persons who are affected by Northwell Health’s risk areas including, but not limited to, Northwell Health’s employees, the chief executive and other senior administrators, managers, medical staff members, contractors, agents, subcontractors, independent contractors, and governing body and corporate officers..

**Students** - Students refer to allied health profession trainees as well as undergraduate and graduate medical education trainees (e.g., students of health profession programs). In this context we are referring to students who are enrolled in a school in which Northwell Health has a formal legal affiliation agreement.

**Voluntary Physicians** - Members of the Medical Staff who maintain a private clinical practice independent of the Hospital.

## PROCEDURE

### 1. Orientation Compliance Training

Compliance training and education shall be made part of the orientation of new compliance officers and Affected Individuals promptly upon hiring.

- a) Employees: Prior to hire, employees, including all executives, must complete compliance training and education. Topics include, but are not limited to safety, quality, infection control and prevention, patient privacy, workplace respect, fraud, waste, abuse, the Code of Ethical Conduct and HIPAA requirements.
- b) Recently integrated entities: As part of their onboarding orientation training program, recently integrated entities will provide Northwell Health assurance that they provide compliance training and education to their employees as well as medical staff, volunteers, students, trainees, physician office staff, contractors, trustees and other persons performing work for or at their entities upon hire and annually thereafter. Recently integrated entities may initially maintain their own tracking logs and attestation of training. Once these entities are completely integrated into Northwell Health, they adhere to Northwell Health's Corporate Compliance training schedule.
- c) Volunteers: As part of their onboarding orientation training, new volunteers receive education on compliance-related topics at their respective sites. In addition, volunteers attest that they have reviewed the training and agree to abide by our Code of Ethical Conduct and compliance policies and procedures.
- d) Trustees: Prospective Board Members receive a "Board Member's Training" package that includes access to the Code of Ethical Conduct and an online compliance presentation regarding board members' duties and responsibilities as well as other topics. The package also includes an attestation form pursuant to which Board Members are required to attest to reviewing the training and agree to abide by our Code of Ethical Conduct and all federal and state laws and regulations and Northwell Health's policies that are applicable to the business.
- e) Applicable Vendors/ Contractors/ Subcontractors/ Independent Contractors/ Agents: these applicable individuals/entities are provided similar or equivalent orientation programs covering compliance topics as applicable to their business/position/role. Generally, these individuals/entities are contractually obligated to comply with any and all pertinent laws, HIPAA, compliance training, performance metrics, warranties, health and background screening, and agree to work in conjunction with the facility/entity they are servicing in order

to ensure that proper orientation is provided to all applicable individuals/entities' representatives providing services. Orientation may include, without limitation, applicable policies and procedures, security protocols, and HIPAA training. Some applicable entities may receive additional orientation on privacy and security of patient information. Applicable individuals/entities receive, as part of their onboarding, a service agreement that conveys Northwell Health's expectations related to their commitment and compliance with all federal and state health care program requirements, as well as with Northwell Health's policies and procedures. In addition, applicable individuals/entities receive Northwell Health's Business Associate Agreement and Master Terms & Conditions which include information related to confidentiality, debarment, disclosure of protected health information and vendor screening.

- f) Voluntary Physicians: Voluntary Physicians applying for privileges at Northwell Health receive training on compliance and other mandatory topics via the Northwell Health public website at <https://www.northwell.edu/support-and-resources/healthcare-professional-resources/physician-orientation-materials>. Voluntary physicians are required to review all of Northwell Health's compliance policies prior to their credentialing. Voluntary physicians attest that they have completed the training and read and reviewed the Code of Ethical Conduct and compliance policies. The signed attestation form is submitted with their initial appointment application.
- g) Students: Each educational institution that has a signed educational affiliation agreement with Northwell Health will ensure that their students complete the Student Compliance/HIPAA training program provided and validated by Northwell Health.
  - i. The educational institution will ensure that all faculty and participants have been trained in and will comply with all applicable federal, state and local laws and regulations governing the confidentiality of Northwell Health's medical records, including the confidentiality and disclosure requirements of New York State statutes and regulations concerning HIV/AIDS-related information as well as the federal Health Insurance Portability and Accountability Act of 1996 ("HIPAA") and the Health Information Technology for Economic and Clinical Health Act ("HITECH") and the regulations promulgated by HHS thereunder.
  - ii. Registered Nurses and Advanced Practice Nursing Students who provide direct patient care or patient-related services will complete the Compliance/HIPAA training program provided and validated by Northwell Health.
  - iii. Upon completion of the training, each Student will contact his or her Northwell Health program coordinator or preceptor to provide confirmation of completion using a Cornerstone at Northwell Completion Certificate, screenshot of the completion or other confirmation method as directed by the Northwell Health program coordinator or preceptor. The Student will not be permitted to commence his or her internship or rotation (administrative or clinical) until confirmation of completion of the training is received by the Northwell Health program coordinator or preceptor; sign the attestation form and give copies to his/her program clinical coordinator who will include this in the "student package" currently being sent to site preceptors. The site preceptor will not accept the Student unless the attestation documents are received prior to commencing the clinical training.

- iv. Students from an educational institution that have not signed an educational affiliation agreement with Northwell Health shall be considered to be volunteers for the purposes of this policy and shall follow the procedure described above for volunteers in addition to any other requirements of the facility's Volunteer Oversight Department.
- h) In addition, Affected Individuals also receive access to a copy of the Code of Ethical Conduct acknowledge such review, and agree to abide by our Code of Ethical Conduct and compliance policies and procedures upon hire and annually thereafter.
- i) The Code of Ethical Conduct is also available on the Intranet, on the Office of Corporate Compliance (Corporate Compliance) webpage. Hard copies of the Code of Ethical Conduct are available from Compliance.

## **2. Annual Training**

Corporate Compliance provides the Mandatory Annual Compliance Training Program (the "Compliance Training Program") to its compliance officers and Affected Individuals annually. The training provides information about compliance issues, expectations and the operation of the Compliance Program.

- a) Employees: Employees, including all executives, shall certify that they have received, reviewed, and will comply with the Code of Ethical Conduct and related compliance policies during the Compliance Training Program.
  - i. Employees are expected to complete the training and education during a timeframe specified by Human Resources.
  - ii. Department/unit managers are responsible for ensuring that their respective employees complete the Compliance Training Program annually within the timeframe established by Northwell Health.
  - iii. Employees who do not satisfactorily complete the Compliance Training Program within the established timeframe may be subject to adverse action, up to and including termination of employment.
  - iv. Alternative training (e.g., classroom sessions, paper) may be available for specific employees, as necessary or appropriate.
  - v. Northwell Health's Human Resources Department shall log and track the completion of the Compliance Training Program by Northwell Health's employees, as applicable.
- b) Applicable Vendors/Contractors/Subcontractors/Independent Contractors/Agents: These applicable individuals/entities receive a mailing each year that educates them on the Deficit Reduction Act of 2005. Included in the mailing is Northwell Health's policy on detecting and preventing fraud, waste, abuse and misconduct and a link to Northwell Health's policy on gifts and interactions with industry.

Applicable individuals/entities shall certify that they have received, reviewed, and will comply with the Code of Ethical Conduct and related compliance policies during the Compliance Training Program.

- i. The Northwell Health facility/entity that the applicable entities are servicing, is responsible for ensuring that the applicable individual/entities complete the Compliance Training Program prior to onboarding and annually thereafter, if applicable.
  - ii. Applicable individual/entities who do not satisfactorily complete the Compliance Training Program within the established timeframe may be subject to adverse action, up to and including termination of contracted work.
  - iii. The Northwell Health facility/entity that the applicable entities are servicing, shall log and track the completion of the Compliance Training Program, as applicable.
- c) Volunteers: Volunteers shall certify that they have received, reviewed, and will comply with the Code of Ethical Conduct and related compliance policies during the Compliance Training Program. Volunteers receive the same annual training that Northwell Health employees receive.
- d) Trustees: Board Members complete Mandatory Trustee Compliance Education annually. There are two options for Board Members to complete the training requirement. Board Members may attend a live education training or complete an independent learning program. Once either training is complete, Board Members certify that they completed the training. The Office of Corporate Compliance logs and tracks the completion of the Mandatory Trustee Compliance Education by the Northwell Health Board of Trustees and other applicable Northwell Health affiliated boards. Board Members also certify that they have received, reviewed, and shall abide by Northwell Health's Code of Ethical Conduct and shall abide by all federal and state laws and regulations and Northwell Health's policies that are applicable to its business.
- e) Voluntary Physicians: Voluntary physicians receive annual training on compliance and other mandatory topics via the Northwell Health public website at <https://www.northwell.edu/support-and-resources/healthcare-professional-resources/physician-orientation-materials>. Voluntary Physicians are also provided access to the Code of Ethical Conduct and related compliance policies during the annual mandatory compliance training. Voluntary Physicians are required to complete the training upon recredentialing and encouraged to complete the training during off-cycle credentialing years. Voluntary Physicians also certify that they have received, reviewed, and will comply with the Code of Ethical Conduct and related compliance policies during annual mandatory compliance training.
- f) Students: Students will be required to complete the annual compliance training only if their internship or rotation endures beyond one year.

### 3. Periodic Training/Other Training

- a) Periodic specialized and/or targeted training and education is provided to applicable individuals throughout the year based on identified risks.
- b) Compliance awareness and education also occurs throughout the year through such communication tools as email notices, letters, posters, screensavers, and specialized compliance training based upon the employee or individual's job responsibilities.

### 4. Training Documentation

The Compliance Officer and Affected Individuals shall complete the compliance training program no less frequently than annually.

- a) Employees: Evidence of the delivery of training is maintained by Northwell Health's Human Resources Department and is readily available upon request.
  - i. Northwell Health has developed and maintains a training plan which outlines the training content owner, course name, subjects or topics for training and education, the timing and frequency of the training, regulatory requirements for the training, delivery methods of the training, which affected individuals are required to attend, how attendance will be tracked, and how the effectiveness of the training will be periodically evaluated.
  - ii. Northwell Health's Human Resources Department maintains a follow-up process for the employees that do not complete Mandatory Annual Compliance Training.
  - iii. Proof of completion of the Compliance Training Program is maintained in Northwell Health's Learning Management System, within the employee's personnel file or comparable department file.
  - iv. Confirmation of completion of the Compliance Training Program through alternative training methods will be documented by training facilitators and organization administrators.
- b) Volunteers: Evidence of the delivery of training is maintained by each facility's Volunteer Services Department.
- c) Trustees: Evidence of the delivery of training is maintained by Corporate Compliance.
  - i. The Office of Trustee Relations and Corporate Compliance maintain a follow-up process for Northwell Health's Trustees that do not complete the annual compliance training.
  - ii. Proof of completion of the Compliance Training Program is maintained by Corporate Compliance.

- d) Applicable Vendors/Contractors/Subcontractors/Independent Contractors/Agents: The Office of Corporate Compliance maintains a listing of all applicable vendors, contractors, subcontractors, independent contractors and agents that receive our Deficit Reduction Act mailing annually. The Office of Procurement and/or applicable business units retain copies of applicable vendor and contractor contracts which set forth applicable compliance expectations and requirements.
- e) Voluntary Physicians: Evidence of the delivery of training is maintained by the Credentialing Office.
  - i. The Credentialing Office logs and tracks the completion of training by the Voluntary Physicians.
- f) Students: Evidence of training is maintained by the student's site preceptor and/or the business unit that is responsible for the clinical training of the student.

## 5. Training Content

Northwell Health has established and implemented an effective Compliance training and education program for its Compliance Officer and all Affected Individuals. The compliance training and education meets the following requirements:

- a) Corporate Compliance and content stakeholders, annually review the Compliance Training Program's training content and revise it as needed.
- b) Compliance training and education will be in plain English and at a level readily understandable by Affected Individuals.
- c) The Compliance Training Program provides training on topics that may include, but not be limited to, the following subjects:
  - i. Risk areas and organizational experience
  - ii. Written policies and procedures
  - iii. The role of the compliance officer and the compliance committee
  - iv. How Affected Individuals can ask questions and report potential compliance-related issues to the compliance officer and senior management, including the obligation to report suspected illegal or improper conduct and the procedures for submitting such reports; and the protection from intimidation and retaliation for good faith participation in the compliance program
  - v. Disciplinary standards
  - vi. Response to compliance issues and implementation of corrective action plans
  - vii. Requirements specific to the Medical Assistance program and category of service
  - viii. Coding and Billing requirements and best practices
  - ix. Claim development and the submission process
  - x. Code of Ethical Conduct
  - xi. Elements of a Compliance Program
  - xii. The Deficit Reduction Act of 2005
  - xiii. Health Insurance Portability and Accountability Act (HIPAA)

- xiv. Compliance issues may include the following areas:
1. Billings
  2. Payments
  3. Medical necessity and quality of care
  4. Governance
  5. Mandatory reporting
  6. Credentialing, and
  7. Other risk areas identified by Northwell Health

## 6. Training of Applicable Joint Ventures and Partnerships

Joint ventures where we hold a majority interest or entities where Northwell Health has been engaged in a professional capacity to provide and/or render compliance services, shall provide new hires with compliance education and training within 30 days of start date and annually thereafter. Evidence of delivery of training and proof of completion of training shall be maintained by the applicable joint ventures and partnerships.

## REPORTING AND ENFORCEMENT

- All violations of this policy shall be reported to the appropriate manager/supervisor/director or to the Office of Corporate Compliance (516.465.8097) for appropriate resolution of the matter. The HelpLine is available 24 hours a day, seven days a week at (800) 894-3226 or online at [www.northwell.ethicspoint.com](http://www.northwell.ethicspoint.com), is accessible to all Affected Individuals and allows for questions regarding compliance issues to be asked and for compliance issues to be reported. Reports of potential fraud, waste and abuse and compliance issues also may be made directly to the Chief Corporate Compliance Officer or designee in person, in writing, via email, mobile device via a QR code, or by telephone. All reports received by the Office of Corporate Compliance are investigated and resolved to the fullest extent possible. The confidentiality of persons reporting compliance issues shall be maintained unless the matter is subject to a disciplinary proceeding, referred to, or under investigation by Medicaid Fraud Control Unit, U.S. Department of Health and Human Services (HHS) Office for Civil Rights, HHS Office of Inspector General, Office of Medicaid Inspector General or law enforcement, or disclosure is required during a legal proceeding, and such persons shall be protected under Northwell Health's policy for non-intimidation and non-retaliation. Violations of this policy will be subject to disciplinary action as outlined in the Human Resources Policy and Procedure Manual and *Northwell Health Policy #800.73 – Compliance Program Disciplinary Standards for Non-Employees*.





## REFERENCES to REGULATIONS and/or OTHER RELATED POLICIES

- Northwell Health Policy# 800.00 – Corporate Compliance Program
- Northwell Health Policy #800.73 – Compliance Program Disciplinary Standards for Non-Employees
- Northwell Health Human Resources Policy and Procedure Manual, Part 5-3 – Workforce Conduct – Progressive Discipline
- Northwell Health Policy# 100.058 – Educational Affiliations
- Northwell Health’s Code of Ethical Conduct
- New York State Social Services Law Section 363-d
- OMIG Compliance Program Guidance, Title 18 NYCRR, Part 521 Fraud, Waste and Abuse Prevention (March 28, 2023)
- OMIG Compliance Program Review Guidance
- Human Resources Policy Part 4-4 Annual Readiness Education Program

## CLINICAL REFERENCES/PROFESSIONAL SOCIETY GUIDELINES

N/A

## ATTACHMENTS

N/A

## FORMS

N/A

<b><u>CURRENT REVIEW/APPROVALS:</u></b>	
Service Line/Department Review	07/10/2025
Northwell Health Policy Committee	07/22/2025❖
System PICG/Clinical Operations Committee	07/22/2025❖

### Standardized Versioning History:

Review/Approvals: ‡ = Service Line/Department; \* =Northwell Health Policy Committee; \*\* = PICG/Clinical Operations Committee;

⊠ = Provisional; ❖ = Expedited

\*03/29/18                \*\*04/19/18

\*12/17/20                \*\*01/14/21

❖03/28/23

\*02/27/24                \*\*03/21/24

\*02/25/25                \*\*03/20/25