

**Policy and Procedure: Corporate Compliance**  
**Topic: Employee Compliance Training**

**Purpose:**

The development and implementation of regular, effective education and training sessions for employees is an integral part of the compliance program. Compliance education is divided into two general components. Within 45 days of hire, all new employees must receive an introduction to the Agency's overall compliance program. Employees whose work is linked to identify risk areas will receive additional compliance education specific to their function, responsibilities and the application within the program.

**Policy:**

1. All employees, including new hires, will receive training related to the organization's overall compliance program.
2. Employees in identified risk areas and members of the Board of Directors will receive more detailed education related to function and responsibilities specific to their program/division, if applicable.
3. Attendance at training sessions is mandatory and is a condition of continued employment or contracting.

**Procedures:**

1. The Training Department 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 sessions must include an explanation of the structure and operation of the compliance program.
3. Compliance education sessions will include information on the following aspects of the compliance program:
  - Code of Conduct and other related written guidance;
  - False Claims Act;
  - Communication channels (Employee Hotline);
  - Organizational expectations for reporting problems and concerns; and
  - Non-retaliation policy (whistleblower).

BOD Approval: 10/02/2007

1

Policy Council Approval: pending

Amended: N/A

Effective: 10/01/2007

H:\Senior Admin\Corporate Compliance Policies and Procedures\Employee Compliance Training P&P.doc

4. Comprehensive education materials will be developed to facilitate the compliance sessions and ensure that a consistent message is delivered to all employees. Overall Agency procedures and materials must be standardized, to ensure everyone attending a session receives the same information. Additionally, divisions may use their own curriculums pertinent to their individualized situations/compliance programs.
5. As part of the initial orientation, each employee and contractor shall receive a training session within the first thirty (45) days of employment or contracting. Each employee and contractor will receive an introduction to OCO's compliance program and objectives, and a written copy of the Code of Conduct, compliance plan and compliance policies. Each new employee or contractor will sign an acknowledgement that they are aware of and will abide by the Corporate Compliance Program and Code of Conduct.
6. All existing employees will receive an initial training session and subsequent training periodically 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.
7. All education and training relating to the Corporate Compliance Program will be verified by attendance. The individual conducting the training will take attendance at all training sessions through the use of a sign-in sheet that records the date of the session and the material presented.
8. 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 an applicable person or member of senior management.
9. Only properly trained individuals will be used to provide compliance education and training seminars. Compliance program trainers must be knowledgeable of the (a) compliance program; (b) applicable federal laws and regulations; (c) requirements of the Federal Sentencing Guidelines; (d) relevant organization policies/procedures; (e) operations of the compliance program; and (f) content of the Code of Conduct.
10. The Compliance Officer is responsible for coordinating with management to ensure that specialized compliance education occurs in identified specialized risk areas at the program/division level.

BOD Approval: 10/02/2007

2

Policy Council Approval: pending

Amended: N/A

Effective: 10/01/2007

H:\Senior Admin\Corporate Compliance Policies and Procedures\Employee Compliance Training P&P.doc