

Compliance Training Workshop

Section 2 Audiences and Topics for Compliance Training

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Content

Agenda

1. Typical Audience Types for Compliance Training
2. Compliance Topics for Training

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Audiences for Compliance Training



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Audiences

- New employees
- All employees (annual or some other cycle)
- Focused (high-risk, job-specific)
- Corrective action
- Vendors/business partners
- Governing board
- Compliance committee(s)
- Volunteers
- Others?



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New Employees



- Introduction to the compliance program
- Code of conduct/code of ethics
- Conflict of interest
- Security/privacy training
- Try to avoid “drinking from the firehose” situation

All Employees

- Review of compliance topics applicable to all (code of conduct, etc.)
- Tone from the top (chair of governing board and/or CEO)
- Some annual certification or other cycle



Focused (High-Risk, Job-Specific)

- Sales and marketing
- Those working with foreign officials
- Finance, reimbursement, A/P, auditors
- Executive management
- Healthcare specific examples:
 - Providers (physicians, nurses, advanced practitioners)
 - Coders/billers
 - IT/security professionals
 - Others



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Corrective Action

- Focused training might be a corrective action when non-compliance has been identified
- Audit/Educate Cycle:



- Document process, demonstrate improvement and correction



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Vendors/Business Partners

- Due diligence before engaging
- Foreign officials
- Anti-bribery
- Security/privacy of data



Governing Board/Committees

- Oversight vs. micro-manage
- What are the right questions for them to ask?
- Great leaders/executives, but that doesn't mean they know about compliance
- Independent reporting
- The buck stops with board

Volunteers (if applicable)

- More common in Higher Education, Not for profits, Government service agencies and Healthcare
- Could be a weak link
- Might be difficult to track centrally
- Good intentions ≠ Compliance
- High turnover



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Topics for Compliance Training



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Topics

- Organization's Code of Conduct/Code of Ethics
- Hotline
- Data Privacy/Security
- Conflict of Interest
- Anti-Bribery/Anti-Corruption
- Foreign Officials (FCPA, UK Anti-Bribery Act, Other Country Specific)
- Marketing Laws/Regulations
- Export Controls
- Industry-Specific Nuances
 - Defense Industry
 - Higher Education
 - Publicly Traded Companies
 - Energy Industry
 - Healthcare
 - Others



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Code of Conduct/Code of Ethics

Organizational Examples:

- <https://www.ussteel.com/sites/default/files/Code%20of%20Ethical%20Business%20Conduct.pdf>
- <https://www.shell.com/about-us/our-values.html>
- <https://www.microsoft.com/en-us/legal/compliance/sbc/download>
- <https://www.mdanderson.org/content/dam/mdanderson/documents/about-md-anderson/about-us/compliance-program/do-the-right-thing.pdf>



Your Organization

- Examples from attendees?



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Hotline



Organizational Examples:

- https://www.walmartethics.com/content/walmartethics/en_us/contact-us.html
- <https://new.siemens.com/global/en/company/sustainability/compliance/reporting-channels.html>
- <https://www.sutterhealth.org/for-employees/confidential-message-line>

Data Privacy/Security



- <https://gdpr-info.eu/>
- <https://www.ftc.gov/news-events/media-resources/protecting-consumer-privacy-security>
- <https://oag.ca.gov/privacy/ccpa>

Conflict of Interest

- <https://dodsoco.ogc.osd.mil/DoD-Personnel/Ethics-Topics-for-DoD-Personnel/Conflict-of-Interest/>
- <https://grants.nih.gov/grants/policy/coi/index.htm>
- https://assets.corporatecompliance.org/Portals/1/PDF/Resources/past_handouts/Higher_Ed/2008/Mon/ConflictofInterest_RoachANDField.pdf
- <https://www.mskcc.org/teaser/conflict-interest-commitment-policy.pdf>



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Anti-Bribery/Anti-Corruption



- <https://www.justice.gov/criminal-fraud/foreign-corrupt-practices-act>
- <http://www.justice.gov.uk/downloads/legislation/bribery-act-2010-quick-start-guide.pdf>
- <https://scholar.smu.edu/cgi/viewcontent.cgi?article=1084&context=lbra>
- <https://www.traceinternational.org/>



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Marketing

- <https://www.ftc.gov/tips-advice/business-center/advertising-and-marketing>
- https://ec.europa.eu/info/law/law-topic/consumers/unfair-commercial-practices-law/misleading-and-comparative-advertising-directive_en



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Export Controls

- <https://www.trade.gov/us-export-controls>
- <https://home.treasury.gov/policy-issues/office-of-foreign-assets-control-sanctions-programs-and-information>
- <https://www.state.gov/bureau-offices/under-secretary-for-arms-control-and-international-security-affairs/bureau-of-political-military-affairs/directorate-of-defense-trade-controls-pm-ddtc/>



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Healthcare



- <https://oig.hhs.gov/compliance/physician-education/01laws.asp>
- <https://oig.hhs.gov/compliance/provider-compliance-training/files/StarkandAKSChartHandout508.pdf>
- <https://www.hhs.gov/hipa/for-professionals/index.html>
- <https://www.justice.gov/civil/false-claims-act>
- <https://www.cms.gov/Medicare/Medicare>

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End of Section Slides



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Additional Exercises or Workbook Activities

Activity Name: Audience Identification

1. Review the audience types identified in the slide deck (slides 4-11).
2. Keeping the needs of your own organization in mind, begin to list names of individuals, departments, business units, and/or business partners who have not received compliance training but probably should.
3. Develop a draft plan that prioritizes which audiences need to be trained the soonest and identify the topics they are likely to need to be trained on. Consider including in your plan delivery method options such as online or in-person.
4. Without disclosing any sensitive or confidential information, be prepared to share something you learned from this activity with the rest of the class.
5. Maintain your notes and draft plan to implement upon return from the workshop.



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Additional Exercises or Workbook Activities

- Pick a compliance training topic from the list in the slide deck material (slides 13-20).
- Prepare 2-3 PowerPoint training slides on that topic.
- Present the slides to the group.
- Email the slides to the instructor so all the scenarios created can be combined and shared via email or other electronic means with all the other attendees.



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Develop a Curriculum Plan

- Assume you are given the responsibility to develop a training curriculum in your organization on data security.
- Draft an outline of a curriculum plan considering the principles discussed thus far in the workshop.



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