

## COMPLIANCE TRAINING POLICY

### SCOPE

This policy shall apply to all faculty, gratis, staff, summer interns, affiliates and students of the Louisiana State University Health Sciences Center – New Orleans (“LSUHSC-NO”).

### PURPOSE

To prevent acts of non-compliance by ensuring that all current workforce members and affiliates of LSUHSC-NO, are fully informed of their rights and responsibilities under all applicable federal and state laws and regulations and Louisiana State University (“LSU Administration”) policies.

### DEFINITIONS

**External Affiliate:** The term “external affiliate” includes, but is not limited to: visiting faculty; visiting researchers; visiting students; and/or contractors, who perform function(s) for or on behalf of LSUHSC-NO and/or access LSUHSC-NO facilities or network. External affiliates may be compensated or gratis.

**Compliance Liaison:** An individual designated by their respective dean or department head to work with the Office of Compliance Programs (“OCP”) to ensure that all workforce members and affiliates in their department complete their assigned compliance training timely.

**Compliance Training:** Training assigned by the OCP to ensure that all workforce members and affiliates are knowledgeable of all laws, regulations, LSUHSC-NO and LSU Administration policies that apply to the performance of their requisite duties.

**Reciprocal Credit:** Credit for completion of an assigned Compliance Training Course that results from completion of training at another institution.

**Sponsor:** An LSUHSC-NO faculty or staff member who authorizes an affiliate to perform functions for or on behalf of LSUHSC-NO.

**Subject Matter Experts:** Departments’ staff that have a high level of expertise in a particular field related to a Compliance Training Course.

**Compliance and Training System (“CATS”):** A system to track the adherence of workforce members and affiliates with required Compliance Training. CATS is a training platform supported by Bridge, a third-party vendor.

**Workforce Member:** Any faculty, gratis, staff, house officer, summer intern, or student.

## **POLICY**

All workforce members and affiliates shall promptly complete all training assigned to them by the OCP in a timely manner.

- New workforce members and affiliates must complete required training within **ninety (90) days** from the date of hire, except for the below exceptions.
- New workforce members and affiliates must complete the following trainings within **thirty (30) days** of hire:
  - Cybersecurity training
  - Driver Education training
  - Driver Authorization Form DA 2054
- Existing workforce members and affiliates must complete all training within **thirty (30) days** from the date of notification.
- Remedial training must be completed within **fourteen (14) days** of notification.

It shall be the responsibility of the OCP to: (1) notify workforce members and affiliates of training requirements; (2) maintain evidence of, and track completion rates for, all mandated compliance training; (3) coordinate delivery of training and provide departments with reports on the status of training assigned to their workforce members and affiliates.

Each LSUHSC-NO department head shall ensure that all employees in their department complete all mandated training timely. It shall be the responsibility of each school’s associate or assistant dean of students to ensure that all students in their respective schools timely complete all mandated training. Deans and vice chancellors shall ensure that any incidents of non-compliance with this policy are investigated, and appropriate corrective action is taken. External affiliate sponsors shall ensure all of their affiliates complete all mandatory training on a timely basis. Sponsors are responsible for providing the OCP with an explanation of an affiliate’s responsibilities. The Compliance Training Coordinator shall review the functions performed by the affiliate in order to assign the appropriate training modules.

## **ASSIGNMENT OF COMPLIANCE TRAINING**

The LSUHSC-NO compliance officer, with guidance from the chancellor and the general counsel, is the final authority on compliance training requirements.

Compliance training courses shall be created for any of the following reasons:

1. Training is required by federal or state laws or regulations.

2. Training that is part of a corrective action plan to address an identified deficiency.
3. Training that is requested by a LSUHSC-NO official or department head to address a particular issue in order to reduce possible fraud, waste and/or abuse.

Workforce members and affiliates may assign any research related training to themselves through **CATS TRAINING LIBRARY**.

### **EXEMPTION FROM COMPLIANCE TRAINING STANDARDS**

In some instances, a compliance training course may be assigned that is not applicable to, or required of a workforce member. For example, Driver Safety training may be assigned to an employee who does not hold a valid driver's license. In such an instance, the individual may make a request to his/her supervisor to be exempted from the training requirement. If the supervisor agrees with the employee's request, the supervisor shall certify to the compliance officer that the individual should be exempted from the compliance training course. The compliance training coordinator will then remove the course from the compliance training requirements for that individual.

In the absence of a policy specifying who shall approve exemptions from a particular course, the following process shall be used when requesting an exemption to an assigned compliance training course:

- Faculty and staff shall request an exemption from their department head.
- House officers shall request an exemption from their program director.
- Department heads and above shall request an exemption from their immediate supervisor.
- Students shall request an exemption from their associate or assistant dean of students.

The department head, supervisor or assistant/associate dean of students shall determine if the requested exemption is appropriate given the course and scope of the individual's duties and, if so, notify the compliance officer or her/his designee, in writing, of the need for an exemption.

### **NOTIFICATION OF COMPLIANCE TRAINING STATUS**

The OCP shall provide department heads with regular reports of the training status of each of the faculty and staff in their department. The department head is responsible for notifying each of the faculty and staff in their department of any incomplete training requirements. Program directors are responsible for notifying house officers in their respective programs of any incomplete training requirements.

The OCP shall provide the Associate or Assistant Dean of Students of each school with regular reports of the training status of the students in their respective schools. The Associate or Assistant Dean of Students is responsible for notifying the students in his/her respective schools of any incomplete training requirements.

## TIMELY COMPLETION OF COMPLIANCE TRAINING

All workforce members and affiliates shall promptly complete all training assigned to them by the OCP in a timely manner.

- New workforce members and affiliates must complete required training within **ninety (90) days** from the date of hire, except for the below exceptions.
- New workforce members and affiliates must complete the following trainings within **thirty (30) days** of hire:
  - Cybersecurity training
  - Driver Education training
  - Driver Authorization Form DA 2054
- Existing workforce members and affiliates must complete all training within **thirty (30) days** from the date of notification.
- Remedial training must be completed within **fourteen (14) days** of notification.

Workforce members and affiliates who are more than ninety days out of compliance with their compliance training requirements shall be referred to their respective dean or vice chancellor for follow-up.

## RECIPROCAL CREDIT

Individuals may have completed training at other institutions that is similar to that required by LSUHSC-NO. In such instances, workforce members may be granted reciprocal credit for one or more compliance training courses. In order for an individual to receive reciprocal credit for an assigned compliance training course, the following documentation must be provided to the compliance officer or his/her designee:

- A copy of the training content completed by the individual at the other institution.
- Documentation (certificates, transcripts, etc.) from the sponsoring institution certifying that the individual successfully completed the training during the same calendar year.

The OCP shall review the training content from the other institution to determine if it is substantially similar to the LSUHSC-NO compliance training course. Reciprocal credit will be granted if the training is determined to satisfy that threshold. Subsequent certificates or transcripts for the reciprocal course(s) granted must be provided each time the course(s) expires based on LSUHSC-NO policies. Any questions regarding the granting of reciprocal credit shall be referred to the compliance officer for final determination.

The compliance training coordinator shall maintain a list of training content that has been approved for reciprocal credit.

## **DOCUMENTATION OF TRAINING**

The OCP shall maintain documentation of all training completed by LSUHSC-NO workforce members and affiliates in accordance with the LSUHSC-NO document retention schedule. Documentation shall be provided upon written request.

## **REFERENCES**

45 CFR §164.308(a)(5)  
45 CFR §164.530(b)  
16 CFR §314.4(b)(1)  
20 U.S.C. 1092 §485(f)(1)  
2012 Louisiana Senate Concurrent Resolution No. 107  
29 CFR §1910.1030(g)(2)(i)  
PM-36 Attachment 1 Chapter 9  
CM-53 Section G

## ROLES AND RESPONSIBILITIES

Role	Responsibility
Workforce Members and Affiliates	<ul style="list-style-type: none"> <li>•Complete all assigned compliance training in a timely fashion as described above.</li> </ul>
Department Head	<ul style="list-style-type: none"> <li>•Ensure that all faculty and staff complete their assigned compliance training timely.</li> <li>•Designate a compliance liaison, as appropriate.</li> </ul>
Associate or Assistant Dean of Students	<ul style="list-style-type: none"> <li>•Ensure all students complete their assigned compliance training in a timely fashion as described above.</li> </ul>
Deans and Vice-Chancellors	<ul style="list-style-type: none"> <li>•Review reports of individuals who have incomplete training requirements which are more than ninety days delinquent.</li> <li>•Work with the departments to ensure that individuals are up-to-date with their compliance training requirements.</li> </ul>
Compliance Training Coordinator	<ul style="list-style-type: none"> <li>•Ensure that compliance training content is accurate and up-to-date.</li> <li>•Ensure compliance training assignments are appropriate for an individual's role.</li> <li>•Serve as the system owner for the Compliance and Training System (CATS).</li> <li>•Coordinate technical support for individuals encountering difficulty in using CATS.</li> <li>•Approve requests for changes in access to CATS.</li> <li>• Provide documentation of training.</li> <li>• Review training content periodically to identify any that can be consolidated or eliminated due to changing requirements and/or risks.</li> <li>• Assist subject matter experts with the development of new training content.</li> </ul>
Compliance Officer	<ul style="list-style-type: none"> <li>• Approve requests for new compliance training requirements.</li> <li>• Approve compliance training content.</li> </ul>

	<ul style="list-style-type: none"> <li>• Review summary reports to identify areas of LSUHSC-NO that may require additional assistance in meeting compliance-training requirements.</li> <li>• Monitor the effectiveness of training by reviewing audit reports, hotline complaints, feedback received from departments, employees and students, network abuse reports and other sources of information.</li> <li>• Coordinate with management, including the Chancellor and the general counsel, to ensure that specialized compliance training occurs in identified risk areas.</li> </ul>
Subject Matter Experts	<ul style="list-style-type: none"> <li>• Provide training content and regulatory expertise to assist in the delivery of training.</li> <li>• Review and approve training content for accuracy and completeness.</li> <li>• Review training content on an annual basis and submit updates to the OCP as necessary.</li> </ul>
Compliance Liaisons	<ul style="list-style-type: none"> <li>• Ensure all workforce members and affiliates without email access are notified of training requirements.</li> <li>• Keep department heads informed of the training completion status of all workforce members within the department.</li> <li>• Perform other tasks as necessary to ensure the department is in compliance with this policy.</li> </ul>
External Affiliate Sponsors	<ul style="list-style-type: none"> <li>• Notify OCP of the external affiliates' responsibilities and access regarding their LSUHSC-NO affiliation.</li> <li>• Ensure all external affiliates complete their assigned training on a timely basis.</li> </ul>