



## Standard Operating Policies – SOP #4 Compliance Education & Training

<b>Title:</b>	<b>Compliance Education and Training</b>	<b>Effective Date:</b>	<b>10/27/2003</b>
<b>Author:</b>	<b>Chief Compliance Officer</b>	<b>Last Review Date:</b>	<b>12/01/2021</b>
<b>Location:</b>	<b>All Locations</b>	<b>Last Revision Date:</b>	<b>12/01/2021</b>
<b>Functional Area:</b>	<b>ADMINISTRATION</b>		

### POLICY

On-going development and implementation of regular Workforce education and training is crucial to an effective compliance program. To ensure a broad-based Liberty Workforce awareness of the Corporate Compliance Program (Program) and specialized competency for staff whose functions could potentially put Liberty at a greater degree of compliance exposure.

### PROCEDURE

1. Compliance education is divided into two general components: (1) a general introduction to the Program, and (2) specialized compliance education for Liberty Workforce whose work and responsibilities are linked to identified risk areas.
2. The Corporate Compliance Officer (CCO) is responsible for ensuring that all Workforce are adequately knowledgeable of, and compliant with, pertinent federal, state and regulatory standards. The CCO's primary responsibilities include developing, coordinating and participating in a multifaceted education and training program regarding the compliance program. The CCO provides direct oversight for the basic and annual training provided to all Liberty Workforce regarding compliance.
3. All Liberty Workforce, including new hires, will receive basic education about the Program, and relevant policies and procedures. Such training will reinforce the need for strict compliance with applicable laws and regulations and will advise employees that any failure to comply will be documented on the Workforce members' performance evaluation and may result in disciplinary action.
4. Within thirty days of their commencement of work with Liberty, new Workforce members will be introduced to the Code of Conduct, informed of their responsibilities regarding the Program, and given instruction in how to report through the traditional chain of command and how to access the Employee Help Line. At time of commencement of work, new Workforce members that are employees will be given an employee manual with a Code of Conduct, on which s/he will sign off.
5. Focused and specialized in-service training will be provided at least annually to Workforce members involved in functions identified by corporate management as "high risk," such as HIPAA/Privacy.
6. Attendance at all training programs will be monitored and properly documented.
7. Comprehensive education materials and documentation systems are established by the CCO and reviewed by corporate management and Human Resources Department and are available to facilitate compliance training sessions and ensure a consistent message across the organization.

**Approved By:** \_\_\_\_\_

## Revision History

Version	Date	Author	Summary of Changes
#1	10/27/2003	Judith Ann Shields	Initial ISF release – refactor and update of previous security policies into distinct documents
#2	08/20/2004	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#3	01/18/2005	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#4	12/22/2006	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#5	12/22/2007	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#6	12/22/2008	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#7	11/15/2009	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#8	8/20/2010	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#9	01/18/2011	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#10	12/22/2012	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#11	12/22/2013	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#12	12/22/2014	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#13	11/15/2015	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#14	08/20/2016	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#15	12/22/2017	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#16	12/22/2018	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#17	11/13/2019	Judith Ann Shields	Annual review, Attorney reviewed added comprehensive education. Added inactivity lock requirement
#18	11/03/2020	Judith Ann Shields	Annual review, Attorney reviewed © LHC, Author Title not name, SOP Title. Added inactivity lock requirement
#19	12/01/2021	John Beck	Annual review, made clarification edits and removed former #7 on compliance seminars. Added inactivity lock requirement