	Department: Corporate Compliance	Policy No.: 102
	TITLE: COMPLIANCE EDUCATION AND TRAINING	
Effective Date: 1/1/15	Revised: 1/1/15	

COMPLIANCE EDUCATION AND TRAINING

SCOPE:

All Ascension At Home, LLC colleagues. For purposes of this policy, all references to “colleague” or “colleagues” include temporary, part-time and full-time associates, independent contractors, clinicians, officers and directors.

PURPOSE:

To provide guidance for all Ascension At Home, LLC and its subsidiaries’ (the “Company”) colleagues on the mandatory compliance education and training program.

POLICY:


All Company colleagues shall receive Compliance training which shall address, at a minimum, legal and ethical expectations in the workplace, including each colleague’s responsibility to report suspected misconduct. All colleagues will receive compliance training within 30 days of hire and annually thereafter. Failure to complete required compliance training may result in disciplinary action up to and including termination. Upon completing each training module, the colleague must pass an educational test with a score of 70% or higher. Regional management is responsible for ensuring all colleagues complete the training requirement.

PROCEDURE:

General Compliance Training

The Company’s Ethics & Compliance Department shall be responsible for developing, implementing, providing, evaluating, tracking and maintaining a compliance training program for the Company. All colleagues and internal contractors shall receive and complete a minimum of two (2) hours of compliance training per fiscal year. New colleagues shall receive an introduction to the Company’s Compliance Program through new hire orientation and shall complete compliance training within 30 days of employment. Compliance training shall, at a minimum, include:

- Definition of a Compliance Program;
- Reasons for and benefits of a Compliance Program;
- Elements of the Compliance Program and other compliance related resources;
- The Company’s Code of Conduct and Statement of Incompatible Activities; and

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- An explanation of the Compliance Helpline operation.

Technical Area Specific Training

The Ethics & Compliance Department Office shall provide guidance to individual regions, divisions and programs in developing specific, technical compliance training for those individuals (i.e. physicians, nurses, social workers, therapists, coders, billers, billing clerks, etc.) who require additional training in their particular areas of expertise. Each region, division and program shall develop and maintain documentation of technical area specific training sessions provided, including attendance logs.