

TITLE: Code of Conduct Distribution and Training	POLICY DESCRIPTION: Distribution and Training Requirements for the HPG Code of Conduct
PAGE: 1 of 3	TYPE: Compliance and Ethics
EFFECTIVE DATE: September 1, 2005	REFERENCE NUMBER: HPG.011

SCOPE:

All HealthTrust Purchasing Group (“HPG”) Colleagues in all departments and all members of HPG Clinical committees and Advisory Boards.

PURPOSE:

To establish requirements for distributing the HPG Code of Conduct (“Code”), collecting Code acknowledgment cards, and conducting orientation and refresher Code training for HPG colleagues, HPG Clinical Committees and HPG Advisory Boards.

POLICY:

1. Code Distribution. Each New HPG Colleague must receive a copy of the Code and return a signed Code acknowledgment card within 30 calendar days of commencing work for HPG.
2. Orientation Code Training.
 - a. Each New HPG Colleague must receive two hours of Orientation Code Training within 30 calendar days of becoming a New HPG Colleague using materials provided by the HPG Ethics and Compliance Officer (“ECO”).
 - b. Should a New HPG Colleague fail to receive Orientation Code Training within thirty (30) calendar days of becoming a New HPG Colleague, the New HPG Colleague must receive the training immediately. The HPG President and ECO must be notified immediately that the New HPG Colleague did not receive the training in a timely fashion, including the name of the New HPG Colleague’s supervisor and an action plan for resolution established.
3. Refresher Code Training.
 - a. Each Current HPG Colleague must receive one hour of Refresher Code Training each calendar year using materials provided by HPG’s ECO.
 - b. Should any Current HPG Colleague fail to receive Refresher Code Training by the end of a calendar year, the Current HPG Colleague must be immediately suspended without pay until such time as he or she receives the training.
 - c. A Current HPG Colleague on leave at the end of the year who did not complete refresher training prior to taking leave, must receive the previous year’s refresher training within 30 calendar days of his or her return provided the current year’s training has not been released.

Example: Mary was on leave at the end of the year and did not receive refresher training prior to going on leave. Mary returns from leave January 15 and since the current year’s refresher training has not yet been released, Mary must take the previous year’s refresher training within 30 calendar days of her return.

- d. If a Current HPG Colleague returns after the current year’s refresher training has been released, he or she will not need to receive the previous year’s training and will only be required to receive the current year’s training within 30 calendar days of his or her return.

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Example: John was on leave at the end of the year and did not receive refresher training prior to going on leave. John returns from leave April 1 and since the current year's refresher training has been released, John will not need to complete the previous year's refresher training. John will need to receive the current year's refresher training within 30 calendar days of his return.

DEFINITIONS:

New HPG Colleague, for purposes of this policy, means any newly hired individual, or any individual who previously worked for HPG or any of its subsidiaries but has not worked for HPG or a subsidiary within 90 calendar days or more. Notwithstanding the above, this term does not include part-time or *per diem* Colleagues who are not reasonably expected to work more than 160 hours in the calendar year, except that any such individuals shall be considered a New HPG Colleague subject to the requirements of this policy, at the point when they in fact work more than 160 hours during the calendar year. This definition applies exclusively to this policy and for the determination of Code of Conduct training requirements.

Please note: Any individual terminated for failure to receive Refresher Code of Conduct training in one year and re-hired in the next is considered a New HPG Colleague for purposes of this policy regardless of the number of days of break in service.

Current HPG Colleague, for purposes of this policy, means any individual who at one time was a New HPG Colleague and is reasonably expected to work more than 160 hours in the calendar year or works more than 160 hours in the calendar year. (Therefore, individuals could be New HPG Colleagues in one year, which would also make them Current HPG Colleagues for that year, but not be a Current HPG Colleague the next year – because they do not work 160 hours. The following year if they work 160 hours, they could again be Current HPG Colleagues.)

PROCEDURE:

1. The HPG Ethics and Compliance Officer (ECO) shall ensure that a process is established and maintained for:
 - a. Providing a copy of the Code to each full-time New HPG Colleague within 30 calendar days of his or her employment or assignment to HPG;
 - b. Providing a copy of the Code to each part-time or *per diem* New HPG Colleague;
 - c. Collecting a signed Code acknowledgment card from all persons provided a copy of the Code pursuant to this policy and maintaining such cards in the person's official personnel file;
 - d. Conducting two hours of Orientation Code training within 30 calendar days of an individual becoming a New HPG Colleague.

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<ul style="list-style-type: none"> e. Conducting one hour of Refresher Code Training annually for all Current Colleagues subject to this policy, using materials provided by the HPG ECO; f. Reporting to the HPG President the name of the supervisor of any HPG Colleague who fails to receive Orientation Code Training within thirty (30) calendar days of an individual becoming a New HPG Colleague and establishing an action plan for resolution. g. Suspending without pay any who fails to receive Refresher Code Training by the end of the year. <p>2. Whenever the Code of Conduct is reissued, it must be distributed pursuant to instructions from the HPG ECO.</p>
