



COMBINED POLICY, PROCESS & PROCEDURE DOCUMENT

POLICY: Compliance Training and Education

POLICY NUMBER: COM-06

POLICY OWNER: Compliance Officer

POLICY LAST UPDATED: June 18, 2020

POLICY VERSION: 1.0

POLICY STATUS: Final

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REVISION AND APPROVAL HISTORY

Revision History

Version	Date	Author	Revision Notes
1.0	6/18/2020	Outside Counsel	Initial draft of policy

Approval History

Approver	Title	Date	Signature
Lexie Conway	CO	5/26/2021	Lexie Conway

Review History

Review Date	Reviewer	Review Comments

PURPOSE

The purpose of this policy is to ensure Insight Global, LLC ("Insight Global" or the "Company") will provide a regular education and training program on its compliance program ("Compliance Program") policies. It requires the participation of all Insight Global employees, directors, management, and individuals contracted by the Company to provide staffing support or related services directly to Insight Global customers ("Personnel") to ensure that such individuals are aware of and comply with all applicable laws, regulations (especially as they relate to federal healthcare programs) and Insight Global's Compliance Program.

I. PROCEDURE

The Compliance Officer (the "CO") or his/her designee, with the assistance of legal counsel (as appropriate), shall be responsible for developing, implementing, regularly reviewing and updating a compliance education and training program that includes dissemination of educational materials and general and targeted compliance training activities.

Education.

- The CO shall make all compliance policies related to the Company's Compliance Program (the "Compliance Policies") available to all current Personnel. New hires will be given a copy of the Compliance Policies within thirty (30) days of becoming Insight Global Personnel.
- The CO shall ensure that job descriptions include references to the obligations and responsibilities expected of such position under the Compliance Policies.

General Compliance Training.

- Insight Global shall provide all Personnel with a general compliance training program.
- General compliance training shall be provided annually to current Personnel and provided to new hires within thirty (30) days of their becoming Insight Global Personnel. It may also be provided more frequently for specific individuals as required by the CO.
- General compliance training shall be provided by instructors qualified to present the subject matter involved or sufficiently experienced in the issues presented to adequately field questions and coordinate discussions among those being trained. Where the general compliance training is not presented live (e.g., through a taped session), a qualified individual shall be made available to respond to questions after an individual has received training.

- Where necessary, general compliance training shall be offered in various formats and by instructors qualified to accommodate individuals with disabilities or language barriers.
- The general compliance training shall address Insight Global's Compliance Policies and applicable laws, regulations and guidance, including:
 - the requirement that Compliance Program requirements, laws, regulations and guidance be followed and the consequences if they are not;
 - the importance of asking questions and seeking guidance of the CO when in doubt about the application of the Compliance Policies, laws, regulations or guidance to a particular situation;
 - the obligation to report any practice that the person believes may violate Compliance Program requirements or applicable law;
 - Insight Global's policy regarding confidentiality with respect to reports of suspected noncompliance; and
 - Insight Global's policy of non-retaliation with respect to good faith reports of suspected noncompliance.

Targeted Compliance Training.

- The CO, with the assistance of the Compliance Committee and the Legal Department (as appropriate), shall be responsible for identifying topics that are conducive to targeted training (including, but not limited to, for Personnel who regularly engage with healthcare professionals) and the most effective format for providing such training. Targeted training may include, for example:
 - A training session for all Personnel on a new area of law or business requirement.
 - A training session for a particular sub-set of personnel in response to issues identified in an audit conducted pursuant to the Compliance Monitoring and Auditing Policy.
 - A memorandum to all Personnel regarding a particular compliance issue.
 - A training session for an individual as part of a corrective action plan developed in accordance with the Investigating and Responding to Compliance Issues Policy.

Participation; Certification.

- Participation in compliance training shall be considered a critical employee evaluation factor.

- Failure to participate in general compliance training or in any mandatory targeted training will result in disciplinary action.
- At the conclusion of each compliance training, all individuals who complete the training must sign a certification affirming that they have completed, understood and will abide by the requirements set forth in the compliance training.
- Upon completion of the training, each employee shall sign a certification to attest that the employee has not been on a state/federal exclusion list, has no knowledge of any impending placement on such list, and agrees they will notify the Compliance Committee if they should become aware of their potential exclusion.

DOCUMENTATION

Insight Global shall maintain documentation of the content of all training provided to Insight Global Personnel as well as a record of who conducted the training, when the training occurred, to whom the training was provided, and the certifications of trainees, in accordance with the Company's Record Retention Policy.

APPROVAL/MAINTENANCE

This policy is approved by the CO and/or the Compliance Committee. Maintenance of this policy will be the responsibility of the Compliance Committee in coordination with the CO. The terms of this policy are subject to the Wrapper Policy.