

Evidencing Employee Understanding of Compliance Training

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- **Compliance officers are responsible for ensuring that all employees understand compliance requirements.**
- **Learning is hard, and forgetting is easy. Compliance officers should assess retention of compliance lessons between annual training periods.**
- **Compliance officers also need to identify weaknesses in training courses and update them accordingly.**

Compliance officers are responsible for ensuring that employees receive compliance training and understand appropriate compliance behavior, including the regulatory and legal boundaries within which they must operate. Doing so is critical for embedding compliance in the culture of the organization.

This responsibility does not end with delivery of training courses or completion of a simple checklist which evidences that training was delivered. Rather, it requires ongoing assessment of the effectiveness of training in ensuring employee compliance. Determining what employees have retained and forgotten from training is crucial for maintenance of an effective compliance program. This is also an important step in planning improvements for the next round of training.

Most health care organizations rely upon quizzes to assess comprehension at the conclusion of compliance training. (This is also a common feature of training courses that are administered via learning management systems.) However, the question remains of whether testing truly evidences employee understanding of and commitment to the lessons provided. A related concern is whether the lessons will be remembered over time. Learning is hard, and forgetting is easy. The real test of any compliance training is in how well individuals retain and apply any resulting knowledge. Annual refresher training may not be sufficient to achieve these ends. Whether employees retain compliance training lessons often depends on whether the content is tailored to specific roles and provides meaningful impacts on compliant behavior. While compliance officers may hope that basic compliance principles will not be easily forgotten, training requires constant reinforcement.

To ascertain how well employees comprehend and adhere to training messages, as well as identify which issues need to be emphasized in the subsequent round of training, organizations

need to implement a mechanism for assessment outside the parameters of the regular training period. One way to achieve this goal is by deployment of a validated and tested [Compliance Knowledge Survey©](#) or [Compliance Culture Benchmark Survey©](#). The former focuses on compliance program knowledge, while the latter assesses attitudes and perceptions toward organizational compliance. The most important result from such surveys is the ability to benchmark and compare results against the universe of health care entities that have utilized the same instruments.