Optum Policy Summary
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Policy Information			
Policy Title	Optum Compliance Training	**Current Version Publish Date**	03/16/2022
Version	5.1	**Original Effective Date**	01/01/2015
Policy Identifier	ID-7102		

Policy Applicability			
Country	All Optum Countries	**State/Territory**	All Optum States/Territories
Employee Applicability	Employees of Businesses shown in this Policy	**Business Applicability**	Specific to Businesses shown in this Policy
Contingent Worker (Contractor) Applicability	Specific to Contingent Workers (Contractors) of Businesses shown in this Policy	**Market Group**	Optum
External Segment	Optum Enterprise Wide	**Internal Segment**	Optum Enterprise Wide
Business		**Division**	
Products Impacted			
Exception Description			

Policy Statement and Purpose

Compliance & Ethics are the responsibility of every employee and contractor. Each employee/contractor is accountable for complying with laws, regulations, contractual obligations, the Company Code of Conduct and the Company's policies and procedures, including required trainings.

Optum will provide required compliance training to employees and contractors in accordance with applicable laws, regulations, contractual requirements and company policies.

Policy Definitions

Company: Optum, Optum's parent company and their affiliates.
Contractor: Any worker who is to be retained for a limited service period and is not a regular employee of the Company.
Employee: An individual hired by the Company on a full-time, part-time, exempt, non-exempt, regular or temporary basis.
Learning Management System (LMS): a software application for the electronic administration, documentation, tracking and delivery of education courses.
Non-Integrated Entity (NIE): An Optum business not fully integrated into the Company's payroll, benefits, and/or technology systems.

Policy Provisions

New Hire Training:

All new employees including the Executive Management Team (EMT), contractors, and governing body members are required to complete within ninety (90) days of hire training on the company Code of Conduct; compliance; privacy and security; and fraud, waste and abuse. Additional compliance trainings may be required depending on grade level, job function and responsibilities.

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Annual Training:

All existing employees including the Executive Management Team (EMT), contractors, and governing body members are required to complete on an annual basis, training on the company Code of Conduct; compliance; privacy and security; and fraud, waste and abuse. Additional compliance trainings may be required depending on grade level, job function and responsibilities.

Targeted Compliance Trainings:

Ad hoc training may be developed and assigned in response to new regulatory requirements, corrective action plans. identified risks, or in response to performance levels and other indicators.

Training Oversight:

Training materials are maintained by the Company's Compliance and Ethics Office and are designed to comply with applicable regulatory and business requirements. Training and education materials are reviewed and updated as needed to account for regulatory and / or business changes.

The required core compliance training curriculum is managed through the company's online Learning Management System (LMS) . In some cases, trainings may be delivered live, through use of written materials or other modalities as needed.

The company's LMS retains electronic records of assignment and completion of required trainings for employees and applicable contractors with access to the company LMS. All training records are maintained in accordance with the company's record retention schedule. Training completion rates are regularly monitored and reported by the Optum Compliance Team to management and functional business areas.

Non-Integrated Optum Businesses Entity (NIE):

NIEs are expected to adopt and provide the Company's new hire and annual trainings to its employees and applicable contractors. The training rollout plan will be determined during the on-boarding process. Optum businesses not fully integrated and without access to the Company's LMS are required to submit monthly metrics demonstrating training completion rates for their employees and applicable contractors.

Policy Contacts			
Policy Resources Available	Optum Compliance Policy Administration mailbox	**Contact(s)**	
Email Questions	compliance-policy@optum.com	**Telephone**	

Resources and Materials for this Policy	
Related Policies	
Related Procedures	
Related Internal or External Links	
Related Process Instructions / References	
Relevant Legal or Regulatory Guidance / Requirements	
Related Job Aids	
Related Process Maps	

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Other Reference Links			
Attachments			
Business and Regulatory Requirements			
Description of Business / Regulatory Requirements			
Related Documents			
Policy Owners and Administrators			
Policy Administrator	Baltes, Cassandra L Pirk, Raeanne M	**Executive Owner**	Ciavarella, Tracy W
Policy Owner	Young, Alicia M		
Review Frequency	Annually	**Next Required Review Date**	02/17/2023
Training and Communication			
Training Owner / Group		**Communications Owner / Group**	
Training Required?	Yes	**Formal Communications Required?**	
Required Training Frequency	As Needed	**Communication Channel**	
How is Training Delivered?	Other		

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