

Name of Policy: Mandatory training Policy Number: 3364-25-127 Approving Officer: Executive VP for Finance and Administration & CFO Responsible Agent: Chief Human Resources Officer, Chief Risk Officer Scope: All University of Toledo Campuses		 Effective date: April 30, 2026 Original effective date: October 30, 2017	
Keywords: mandatory training, compliance, regulatory, upon hire, recurring			
	New policy	X	Minor/technical revision of existing policy
	Major revision of existing policy		Reaffirmation of existing policy

(A) Policy statement

It is the policy of the university of Toledo that employees adhere to all applicable federal, state, and university rules and regulations in the course of their jobs. It is the obligation and responsibility of administrators and university personnel to educate and update university personnel when applicable to ensure compliance with these rules and regulations.

(B) Purpose of policy

To offer compliant and standardized training on federal/state regulatory programs, or trainings otherwise deemed appropriate.

(C) Procedures

The primary components of the university's compliance training for employees include, but are not limited to the following:

- (1) New hire orientation: employees will receive an overview of the most significant university policies, information about the university's anonymous reporting line, and the state of Ohio's ethics hotline. They will also learn where and how to find additional guidance on these subjects.
 - (2) First thirty days of employment: The university will use the first thirty days of employment to supplement the following compliance information the employee received at new hire orientation:
 - (a) Ohio ethics law
 - (b) Title IX
 - (c) Health insurance portability and accountability act of 1996 ("HIPAA") basics (all departments listed as part of the hybrid and affiliated covered entity, and all employees who reside on the health science campus, according to rule 3364-15-01 of the Administrative Code (the HIPAA organizational structure and administrative responsibilities))
 - (d) Data security and privacy
 - (e) Non-discrimination
 - (f) Ohio fraud reporting
 - (3) Recurring training; Employees will receive compliance training on a regular and ongoing basis. Most recurring compliance training occurs on a one-to-two-year cycle from date of hire.
- (D) Roles and responsibilities
- (1) Risk management: develop compliance training content, deliver training content, monitor participation take necessary follow-up actions
 - (2) Department leaders: ensure all employees attend and/or take the specific training(s)
- (E) Compliance education for non-traditional staff

- (1) Non-traditional staff for purpose of this policy, are defined as contract, agency, and temporary employees working at the university of Toledo for a limited period of time.
 - (2) It is the responsibility of department managers, directors, and contract supervisors to ensure that all non-traditional staff employees who will not be attending the new employee orientation are educated on basic compliance protocols.
- (F) Senior leadership or their designee(s) reserve the right to add or remove training and to adjust training frequencies as needed.
- (G) Failure to follow university policies may result in discipline up to and including termination.

Approved by: <u>/s/</u> Matthew Schroeder EVP Finance & Administration and CFO Date: Review/revision completed by: • Chief Human Resources Officer • Director Title IX Compliance & Title IX Coordinator • Office of Risk Management	Policies superseded by this policy: • None Original effective date: October 30, 2017 Review/revision date: November 20, 2019 October 20, 2023 April 30, 2026 Next review date: April 30, 2029
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