



**Troy Medicare Policy and Procedure**

<b>Title:</b> Effective Training and Education		<b>Policy Number:</b> CMP 007	
<b>Primary Department:</b> Compliance	<b>LOB:</b> Medicare Advantage		<b>Author:</b> S Scott
<b>Effective Date:</b> 10/26/2022	<b>Original Date:</b> 10/26/2022	<b>Review Date(s):</b> 11/24/2023, 10/15/2024	<b>Archive Date:</b>
<b>Interactive Related Department(s)</b>			
<input checked="" type="checkbox"/> All Departments <input type="checkbox"/> Compliance <input type="checkbox"/> Medical Management <input type="checkbox"/> Provider Operations <input type="checkbox"/> Sales and Marketing	<input type="checkbox"/> Appeals and Grievances <input type="checkbox"/> Customer Service <input type="checkbox"/> Member Services <input type="checkbox"/> Quality Management <input type="checkbox"/> Utilization Management	<input type="checkbox"/> Care Management <input type="checkbox"/> Enrollment <input type="checkbox"/> Plan Administration <input type="checkbox"/> Claims <input type="checkbox"/> Other _____	

**POLICY PURPOSE**

Troy Health, Inc. is committed to identify training and the educational needs of its workforce to promote high ethical standards in its business environment. The purpose of this policy is to demonstrate Troy Health’s commitment to comply with the regulations for training of its workforce on the compliance policies and procedures, Code of Conduct, and other training related to the Medicare requirements specific to job functions.

The Chief Compliance Officer is required to ensure Troy Health is compliant with the requirements to establish and implement an effective Compliance training and education program for employees, executive team, managers, and governing body members.

Each departmental leader is required to ensure accurate and appropriate training for the employees. This includes initial and ongoing job training and targeted trainings as needed.

Troy Health is committed to complying with federal and state rules and regulations.

**SCOPE**

This policy applies to all employees, contractors, and the Board of Directors.

**REFERENCES**

- 42 CFR 422.503(b)(4)(vi)(C)
- 42 CFR 423.504(b)(4)(vi)(C)
- Medicare Managed Care Manual Chapter 21 – Compliance Program Guidelines and Prescription Drug Benefit Manual Chapter 9 - Compliance Program Guidelines, Section 50.3

## **RESPONSIBLE PARTIES**

- Chief Compliance Officer

## **DEFINITIONS**

- Education – the knowledge and development of learning, through instruction, experience, and exposure to information.
- Training – the process of teaching or learning the skills and knowledge needed for a particular job or activity.

## **POLICY**

Troy Health must establish, implement, and provide effective training and education for its employees, including the CEO, senior management, and the Board of Directors. The Chief Compliance Officer oversees the required training and education program to ensure it is effective.

The Compliance Training includes the following topics: the function of the compliance program, the detection, prevention, and correction of potential fraud, waste, and abuse (FWA), the Code of Conduct, conflict of interest, gift policies, laws and regulations related to Medicare Advantage, and HIPAA privacy and security requirements. Compliance training must be completed within 90 days of hire, and annually thereafter. Evidence of completed training must be recorded and retained for a period not less than ten (10) years.

Additional training may be required if a business area is correcting non-compliance and/or is under a corrective action plan through Compliance. Other education may occur to gain understanding of the Medicare requirements for a specific job function, or upon the development of new procedures, or if requirements change and new processes must be implemented. The goal of the Training and Education part of the Compliance Program is to ensure employees have the knowledge and skills to be compliant with their job responsibilities and identify potential fraud, waste, and abuse.

## **PROCEDURE**

1. Annually, the Compliance Training requirements are reviewed by the Troy Compliance department and updated if new content should be added, or previous requirements need to be removed.
2. As the Compliance Program matures, new approaches may be added to improve convenience for participants to complete training on their own time.
3. Employees will receive the Compliance Training during new employee orientation via the Human Resources platform or other platform or distribution methodology. Completion of compliance training will be tracked to ensure completion within 90 days of hire or contracting. Failure to complete the training may result in termination.
4. Contractors will receive the Compliance Training during onboarding via the Human Resources platform or other platform or distribution methodology. Completion of compliance training will be tracked to ensure completion within 90 days of hire or contracting. Failure to complete the training may result in termination of the contracting arrangement.
5. Annually, the Compliance Department will notify employees by email or other distribution method that their Compliance Training is due by a date. Failure to complete the training may result in termination.

6. Each departmental leader is responsible for ensuring adequate training for his/her employees on the applicable processes, requirements and departmental procedures that ensure accurate, complete and compliant delivery of services.

**ATTACHMENTS/RELATED POLICIES/STANDARD OPERATING PROCEDURES**

- None

**APPROVALS**

*Sally Scott*

*Christina Za*

Chief Compliance Officer

Policy Committee

**10/30/2024**

**10/29/2024**

Date

Date

**Revision History**

Revision Date	Revised by Whom	Revisions Made
11.24.2023	S Scott	Added commitment to compliance statement, updated language for clarity in procedure, added new step 4 in procedure. Added language to clarify responsibility of and expectations department leaders to provide departmental trainings.
10.15.2024	S Scott	Annual review; updated regulatory references