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 Medicare’s commitment to comply with the regulations for training of the compliance policies and procedures, Code of Conduct, and training related to the Medicare requirements specific job function.

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

SCOPE

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

REFERENCES

- 42 CFR 422.503(b)(4)(vi)(C)

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 their 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 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 links to the Compliance Training during new employee orientation, and it will be tracked to ensure that they complete within 90 days. Failure to complete the training may result in termination.

4. Annually, the Compliance Department will notify employees by email that their Compliance Training is due by a date (ample notice). Failure to complete the training may result in termination.

ATTACHMENTS/RELATED POLICIES/STANDARD OPERATING PROCEDURES

- None

APPROVALS

Sally A. Scott

Chief Compliance Officer

10 / 26 / 2022

Date: