Policy Title: Education & Training			
Department Responsible: THN Compliance & Privacy	**Policy Number:** TD-001	**THN's Effective Date:** January 1, 2022	**Next Review/Revision Date:** September 30, 2023
Title of Person Responsible: THN Director of Compliance	**THN Approval Council:** THN Board of Managers	**Date Approved:** August 29, 2022	**Date Approved by THN Board of Managers:** August 29, 2022

I. **Purpose.** The purpose of TD-001 is to ensure that all Triad HealthCare Network (THN) Related Individuals (1) understand THN's commitment to compliance and the objectives and requirements of THN's Compliance Program; (2) establish a policy for distributing THN's Compliance Plan, Code of Conduct, and Policies and Procedures and for encouraging understanding and compliance with these authorities; (3) outline policies regarding the development and distribution of Compliance Communications; and (4) procedures to ensure that THN's practices are consistent with its stated policies.

II. **Policy.**

A. THN shall ensure that all THN Related Individuals receive effective education and training, so that they understand (1) THN 's commitment to compliance and the objectives and requirements of THN 's Compliance Program, and (2) the key role that each individual plays in achieving Compliance Program objectives.

B. THN shall make available the Compliance Plan, Code of Conduct, and THN's Policies and Procedures to all THN Related Individuals.

C. THN's Compliance Officer shall develop and distribute Compliance Communications, as defined in CPE-001, that support the Compliance Program and educate THN Related Individuals about compliance matters.

III. **Procedures.**

A. **Participation**. THN requires each THN Related Individual to complete General Compliance Training within 90 Days of hire or contracting and annually thereafter.

1. All THN Related Individuals are required to participate in THN's Compliance Training as a condition of employment, participation, or contracting with THN. Documentation of training completion for each individual shall be maintained. THN Related Individual's shall complete an annual attestation stating that General Compliance; Fraud, Waste, and Abuse (FWA); and Code of Conduct training is provided to its employees and contractors within 90 days (about 3 months) of hire or contracting and annually thereafter. Such documentation

shall specify the type of training received and the date of completion.

2. An individual's failure to participate in Compliance Training will be considered a violation of the Compliance Program and will result in corrective and/or disciplinary action. The procedures for imposing corrective and/or disciplinary action are set forth in CIT-002.
3. THN's Compliance Officer may decide, at his or her discretion, to allow Contractors and Participants to offer their own Compliance Training that meets the requirements outlined in this Policy.

B. **Delivery.** Compliance Training may be presented in any manner that THN's Compliance Officer determines to be effective. This may include, for example, in-person classroom-based training, live web-conference (webinar) training, web-based self-study, or teleconference training. If THN uses computer-based training, it shall make available appropriately qualified and knowledgeable staff or trainers to answer questions or provide additional information to individuals receiving such training.

1. **THN's Compliance & Privacy Office:**
   a. THN's Compliance & Privacy Office will develop and implement a Code of Conduct and General Compliance and FWA training. THN will utilize CMS's Medicare Parts C&D FWA Training and General Compliance Training presentation from the Medicare Learning Network, as well as develop its own presentations as needed.
   b. Training will be reviewed and updated at least annually, or more frequent, for material changes in federal or state laws, CMS guidance, or other requirements.
   c. The Workforce will be identified with assistance from Human Resources.
   d. Training for employees will be delivered through the learning management system (HealthStream) located on the Cone Connects intranet site to all new employees and annually thereafter. Employees should receive an e-mail alerting them to the training requirement.
   e. Training for the Board of Managers, DC Participants, DC Providers/Suppliers, and others acting on behalf of THN may be delivered through the learning management system or other suitable means.
   f. Completion of the review of the Code of Conduct and training will be monitored, and appropriate disciplinary and corrective actions will be taken for failure to complete the training, up to and including termination of employment and participation with THN.
   g. Training records will be maintained for no less than 10 years and include the date completed, the topic, certificates of completion (as needed), and test scores (as needed).
2. **Board of Managers:**

a. THN's Board of Managers is required to review the Code of Conduct, and complete General Compliance and FWA training within 90 days (about 3 months) of appointment and annually thereafter.
b. THN's Compliance & Privacy Office will provide the Code of Conduct and training to the Board of Managers.
c. Upon completion, the Board of Managers is required to complete an attestation indicating each has completed the training and has reviewed the Code of Conduct.

3. **Employees:**
   a. Employees are provided with the Code of Conduct and General Compliance and FWA Training through THN's Compliance & Privacy Office.
   b. Review of the Code of Conduct and training must be completed within 90 calendar days of hire and annually thereafter.
   c. Failure to review and acknowledge the Code of Conduct and complete the training will result in corrective action, up to and including termination of employment.
4. **DC Participants, DC Providers and Others Acting on Behalf of THN:**
   a. DC Participants, Providers/Suppliers and Others Acting on Behalf of THN are required to have a Code of Conduct in place or use THN's Code of Conduct for its employees. The Code of Conduct and General Compliance and FWA training are required to be completed within 90 calendar days of hire or contracting and annually thereafter.
   b. Training materials will be provided using various methods, such as a learning management system, training presentations, e-mails, newsletters, websites, and other means.
   c. Providers who have not been deemed through enrollment into Medicare Part A and Part B, or through accreditation as Durable Medical Equipment, Prosthetics, Orthotics, and Suppliers (DMEPOS), will need to complete the General Compliance and FWA Training. DC Participants, DC Providers/Suppliers, and Others Acting on Behalf of THN will complete an annual attestation stating that General Compliance, FWA, and Code of Conduct Training is provided to its employees and contractors within 90 days (about 3 months) of hire or contracting and annually thereafter.
5. **Medicare Beneficiaries:**
   a. Medicare beneficiaries are provided general education about the identification and reporting of FWA through mechanisms such as the *triadhealthcarenetwork.com* website.
6. **Specialized Medicare Training:**
   a. More specialized training, specific to work activities, is provided by each operational area.
   b. Operational areas deliver new hire training, refresher training, and updates to procedures when changes are made for all employees.

c. THN's Compliance & Privacy Department may provide specialized training when issues or trends are identified warranting such training.

C. **Content Development, Implementation and Review**. THN's Compliance Officer shall be responsible for developing, implementing, regularly reviewing (at least annually), and updating the Compliance Training. This training includes, at a minimum,information on the following areas:

1. Privacy and Security: Including HIPAA/HITECH privacy requirements, State level privacy considerations and THN specific privacy concerns, such as additional privacy requirements found in the GPDC PA;
2. FWA: Including applicable Federal and State FWA laws and the waivers available to the DCE under the GPDC Model;
3. An overview of THN's Compliance Program with a focus on any modifications or additions since the previous Compliance Training;
4. THN's strong and continuing commitment to compliance with all applicable requirements of the GDPC PA and federal health care program laws and regulations with a focus on new legal and regulatory developments;
5. A discussion of THN's Compliance Plan, Code of Conduct, and Policies and Procedures, the requirement that they be followed, and the consequences if they are not;
6. The importance of asking questions and seeking the guidance of THN's Compliance Officer when in doubt about the propriety of a particular practice;
7. The duty to report any practice or activity that the individual suspects violates or may violate any laws, regulations, the Compliance Plan, Code of Conduct, or THN's Policies and Procedures;
8. The methods that can be used to communicate reports of any practice that the employee suspects violates, or may violate, any laws, regulations, the Compliance Plan, Code of Conduct, or THN's Policies and Procedures;
9. THN's policy of striving to protect the identity of individuals who report a practice that the individual suspects violates or may violate any laws, regulations, the Compliance Plan, Code of Conduct, or THN's Policies and Procedures; and
10. THN's policy of non-retaliation with respect to good faith reports of any practice that the individual suspects violates, or may violate, any laws, regulations, the Compliance Plan, Code of Conduct, or THN's Policies and Procedures (where the individual was not involved in the practice at issue).

D. **Development and Distribution of Compliance Communications:**

1. **Preparation**. THN's Compliance Officer shall be responsible for the development and distribution of Compliance Communications, either published separately or as part of other outreach communications. Members of the Compliance Committee THN's Compliance Officer deems appropriate, shall provide assistance.
2. **Content**.

a. Compliance Communications shall contain educational information that THN's Compliance Officer deems appropriate to highlight THN's Compliance Program and compliance-related issues, such as:
   i. Changes to THN's Compliance Program, if any;
   ii. Issues identified by THN's Compliance Officer and/or the Compliance Committee as relevant to highlight or discuss;
   iii. Upcoming compliance training and education programs; and
   iv. THN's compliance resources (e.g., links to the on-line version of the Compliance Plan, Code of Conduct, and Policies and Procedures, and how to access the Confidential Compliance hotline for use in reporting suspected non-compliance.)
b. Compliance Communications may contain any other information relating to compliance that is deemed appropriate by THN's Compliance Officer.

3. **Distribution**.
4. **Certification**. Each THN Related Individual shall certify, electronically or in writing, that he or she has received, read, understands, and will comply with THN's Compliance Plan, Code of Conduct, and Policies and Procedures. Such certifications must be obtained by THN within 90 Days of hire or contracting.
   a. THN's Compliance Plan, Code of Conduct, and Policies and Procedures shall be made available, electronically and/or in hard copy, to all THN Related Individuals within 90 Days of hire or contracting, and upon request thereafter.
   b. Compliance Communications shall be made available to all THN Related Individuals, as appropriate. THN's Compliance Officer shall determine which individuals should be included in Compliance Communications.
   c. THN may use any appropriate format and distribution method for Compliance Communications (e.g., paper, e-mail, intranet, and/or inclusion with other newsletters published by THN).
   d. Archived copies of Compliance Communications shall be available upon request.

E. **Audit/Documentation**. THN shall audit and document compliance with the Training & Development (TD) Policies and Procedures. Such audits shall be conducted pursuant to the Audits, Monitoring, and Oversight (AMO) Policies and Procedures. Relevant documentation, which may include electronic documentation, shall be maintained on the Cone Health SharePoint site with THN's document retention policies but, in no case, for a period of less than ten years. Documentation shall include:
   1. All materials used in connection with the Compliance Training (e.g., course descriptions and course materials, whether conducted as an in-house training program, an external workshop, or using computer-based training

methods); and

2. Sign-in sheets, attendance records, certifications, and/or any other documentsused to reflect and confirm participation in the Compliance Training.

Date	Reviewed	Revised	Notes
January 1, 2022			Originally Published
August 2022	X		No changes