



Policies and Procedures

Policy Title Training and Education			
Department Responsible Compliance and Integrity	Policy Code THN – 1.20	Effective Date May 2016	Next Review Date May 2017
Title of Person Responsible Compliance Officer	Approval Council Triad Healthcare Network Board of Managers		Approved Date May 24, 2016

PURPOSE

Part of an effective compliance and integrity program is having an effective training and education element. The purpose of this training and education policy is to help ensure that Triad Healthcare Network, LLC (THN) and Accountable Care Organization (ACO) and its employees, members of the Board of Managers (when acting on behalf of the Company), ACO Participants, ACO Providers/Suppliers, and others acting on behalf of THN (Workforce), understand the commitment to compliance and comply with the federal or state laws and regulations including, but not limited to, the Centers for Medicare and Medicaid Services (CMS) Accountable Care Organizations.

DEFINITIONS

TERM	DEFINITION
ACO Participant	An entity identified by a Medicare-enrolled billing TIN through which one or more ACO providers/suppliers bill Medicare, that alone or together with one or more other ACO participants compose an ACO, and that is included on the list of ACO participants that is required under 42 C.F.R. § 425.118.
ACO Provider/Supplier	An individual or entity that: (1) is a provider or supplier under Medicare regulations; (2) is enrolled in Medicare; (3) bills for items and services furnished to Medicare fee-for-service beneficiaries during the agreement period under a Medicare billing number assigned to the TIN of an ACO participant; and (4) is included on the list of ACO providers/suppliers that is required under 42 C.F.R. § 425.118.

POLICY

THN shall provide effective education and training to its Workforce, so that they understand the commitment to compliance; the objectives and requirements of THN’s Compliance and Integrity Program; and the role that each has in achieving Compliance and Integrity Program objectives.

RESPONSIBILITIES

THN will establish, implement and provide effective compliance and fraud, waste, and abuse (FWA) training for its Workforce. THN’s training and education programs are reviewed and updated, as needed, but at least annually.

A. Compliance and Integrity Office

- The Compliance and Integrity 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, developing its own presentations as needed.

- 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.
- The Workforce will be identified with assistance from Human Resources.
- Training for employees will be delivered through the learning management system (HealthStream) located on the ConeConnects intranet site to all new employees and annually thereafter. Employees should receive an email alerting them to the training requirement.
- Training for Board of Manager, ACO Participants, ACO Providers/Suppliers, and other acting on behalf of THN may be delivered through the learning management system or other suitable means.
- 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 the THN.
- Training records will be maintained for 10 years and include the date completed, the topic, certificates of completion (as needed), and test scores (as needed).

B. Board of Managers

- THN's Board of Managers is required to review the Code of Conduct, and complete general compliance and FWA training within 90 days of appointment and annually thereafter.
- The Compliance and Integrity Office will provide the Code of Conduct and training to the Board of Managers.
- 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.

C. Employees

- Employees are provided the Code of Conduct and general compliance and FWA training and education through THN's Compliance and Integrity Office.
- Review of the Code of Conduct and training must be completed within 90 calendar days of hire and annually thereafter.
- 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.

D. ACO Participants, ACO Providers/Suppliers and Others Acting on Behalf of THN

- ACO Participants, ACO 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.
- Training materials will be provided using various methods, such as a learning management system, training presentations, emails, newsletters, website and other means.
- Providers who have not been deemed through enrollment into Medicare Part A and Part B, or through accreditation as a Durable Medical Equipment, Prosthetics, Orthotics, and Suppliers (DMEPOS), will need to complete the general compliance and FWA training.
- ACO Participants, ACO 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 of hire or contracting, and annually thereafter.

E. Medicare Beneficiaries

- Medicare beneficiaries are provided general education about the identification and reporting of FWA through mechanisms such as the triadhealthcarenetwork.com website.

F. Specialized Medicare Training

- More specialized training, specific to work activities are provided by each operational area.
- Operational areas deliver new hire training, refresher training and updates to procedures when changes are made, to all employees.
- Compliance and Integrity may provide specialized training when issues or trends are identified warranting such training.

REFERENCE DOCUMENTS/LINKS

42 CFR 425.300

ATTACHEMENT

N/A

PREVIOUS REVISION/REVIEW DATES

Date	Reviewed	Revised	Notes
N/A	N/A	N/A	This is a new policy.