



Title: Compliance Program Training and Education Policy

Date Created: March 1, 2015

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Date Approved by CCN Board of Directors: June 10, 2025

Date Approved by CCC Board of Directors: September 24, 2024

Date Approved by IPA Board of Directors: September 24, 2024

Policy# CC13

Purpose:

To ensure appropriate compliance training for members of the Care Compass Entities' Affected Individuals.

Definitions:

Affected Individual(s): All persons who are affected by Care Compass Entities' risk areas including Care Compass Entities' employees, officers, Directors, managers, contractors, agents, subcontractors, independent contractors, governing bodies, or third-parties, who or that, in acting on behalf of the Care Compass Entities: (i) delivers, furnishes, directs, orders, authorizes, or otherwise provides health or social care items and services under State, Federal, or Care Compass programs; and (ii) contributes to the Care Compass Entities' entitlement to payment under Federal health or social care programs, or from other payor sources.

Care Compass Entities: Organizations that are directly, or indirectly through one or more intermediaries, owned or controlled by, or are under common ownership or control of, Care Compass Network, including Care Compass Collaborative, Inc. and Care Compass Supporting IPA, LLC .

Participant: Any organization that has signed an agreement related to a funded program with the Care Compass Entities.

Staff: Employees, volunteers, and others who act on the Care Compass Entities' behalf.

Policy:

It is the policy of the Care Compass Entities to develop and offer on-going educational and training programs so that Affected Individuals are familiar with the Care Compass Entities' Compliance Programs and understand the fraud and abuse, antitrust, and other applicable laws and regulations that pertain to the activities of the Care Compass Entities.

I. General Compliance Training.

- a. The Care Compass Entities' Affected Individuals, as needed but no less than annually, will receive initial and ongoing training and education on the Care Compass Entities' Compliance Programs to educate them on how to perform the activities of the Care Compass Entities in compliance with applicable laws and regulations, and with the Care Compass Entities' written Codes of Conduct and specific policies and procedures.

- b. Training will emphasize that compliance is a condition of employment, service on the Board or committee, or participation with the Care Compass Entities and that Affected Individuals associated with the Care Compass Entities have a duty to report known or suspected misconduct and may be subject to disciplinary action if they fail to report the misconduct.
- c. Training and education will address, at a minimum:
 - i. the Care Compass Entities' Codes of Conduct,
 - ii. applicable fraud and abuse and antitrust laws,
 - iii. general requirements governing the Care Compass Entities,
 - iv. changes in the laws and in the Care Compass Entities' written policies and procedures,
 - v. coding and billing requirements and best practices and claim development and submissions, as applicable,
 - vi. the role of the Director of Compliance and the Compliance Committees,
 - vii. how Affected Individuals can ask questions and report potential compliance-related issues to the Director of Compliance and senior management, including the obligation of Affected Individuals to report suspected illegal or improper conduct and the procedures for submitting such reports; and the protection from intimidation and retaliation for good faith participation in the Compliance Program,
 - viii. disciplinary standards, with an emphasis on those standards related to the Care Compass Entities' Compliance Programs and prevention of fraud, waste, and abuse,
 - ix. how the Care Compass Entities respond to compliance issues and implement corrective action plans, and
 - x. areas of risk specific to the Care Compass Entities or otherwise identified as relevant to the Care Compass Entities.

II. Training Methods. Acceptable means of training and education include, as appropriate, conducting training seminars or attending third-party training opportunities, or less formal means such as distribution of newsletters and other written communication, the posting on a compliance bulletin board, and such other means as determined to be effective in communicating the Care Compass Entities' commitment to compliance as well as the laws, regulation, and other requirements that govern the Care Compass Entities' day-to-day operations.

III. Other Specialized Training. The Care Compass Entities' Affected Individuals, will routinely, and as needed, receive specialized training on other areas of law relevant to the Care Compass Entities for the purpose of educating and training its Affected Individuals on performing functions in a manner that complies with applicable laws, regulations, and standards.

IV. Signed Acknowledgment. Board Members, committee members, and Staff will be given a copy of the Care Compass Entities' Codes of Conduct, as part of the training and education, and will be required to sign an Acknowledgment, upon appointment or hire and annually thereafter, indicating that they are aware of and will abide by the Codes of Conduct.

V. New Board Members, Committee Members, and Staff. New Board Members, committee members, and Staff will receive and complete compliance training and education within two (2) weeks after the beginning of their employment or appointment.

VI. Training Non-Compliance. Failure to complete initial compliance training upon employment or appointment, or by the end of the annual renewal period will be reported to the Director of Compliance who will solicit completion of the training, as required by Policy. If, after a reasonable period of time, not to exceed 30 days, the Board Member, committee member, or Staff has not completed the initial or annual training, the non-compliant status will be reported to the committee Chairperson, Board Chairperson, or Staff's Department Supervisor, as applicable, for follow-up and resolution. If, after 30 days the training has not yet been completed, Board or committee members may be prohibited from attending Board or committee meetings and Staff may be subject to removal from scheduled work and/or disciplinary or corrective actions in accordance with the HR1-11 Disciplinary Action Procedures until training is completed.

VII. Participants. Participants will receive compliance training and education, as identified, as soon as possible after the beginning of, or as the need arises during, their contractual partnership.

VIII. Focused Training. In addition to training Affected Individuals on the Care Compass Entities' Compliance Programs and payment practices, the Care Compass Entities may, as needed, conduct focused training to address potential problem areas identified in the course of an audit or otherwise brought to the attention of the Director of Compliance.

IX. Role of the Director of Compliance

- a. General compliance training and education will be conducted by, or under the direction of, the Director of Compliance.
- b. The Director of Compliance, along with management, will be responsible for developing, conducting, and monitoring education and training activities and will keep a written record of the education and training efforts developed and implemented by the Care Compass Entities, including documentation of each Affected Individual's participation in on-site and outside training and education activities.

X. Training Plans. The Care Compass Entities will develop and maintain an annual training plan. The training plan will, at a minimum, outline the subjects or topic for training an education, the timing and frequency of the training, which Affected Individuals are required to complete the training, how attendance will be tracked, and how the effectiveness of the training will be periodically evaluated.

XI. Additional Training and Education. Affected Individuals may be required to participate in other training and education programs developed or offered by the Care Compass Entities, including, but not limited to, quality improvement programs. These programs are in addition to the Compliance Programs and more specialized training and education.

CCN Board Approval History: 3/11/2015, 12/8/2015, 12/21/2017, 2/12/2019, 12/10/2019, 11/10/2020, 11/9/2021, 11/8/2022, 8/08/2023, 8/13/2024, 6/10/2025

CCC Board Approval History: 9/12/2023, 9/24/2024

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Compliance Committee Review History: 10/28/2016, 11/17/2017, 1/18/2019, 11/15/2019, 10/16/2020, 10/15/2021, 11/1/2022, 7/28/2023, 7/24/2024, 5/22/2025

Policy Revisions:

Date	Revision Log	Updated By
3/1/2015	Original creation	Ann Homer
11/19/2015	Updated to reflect Care Compass Network organization structure	Rebecca Kennis
11/16/2016	Added Policy Board Review History	Andrea Rotella
11/17/2017	Updated with changes by the Compliance and Audit Committee	Andrea Rotella
1/18/2019	Updated definition of “staff” and other changes by the Compliance and Audit Committee	Andrea Rotella
11/15/2019	Updated with changes by the Compliance and Audit Committee	Andrea Rotella
10/16/2020	Updated with changes by the Compliance and Audit Committee	Andrea Rotella
9/1/2021	Removed references to PPS	Cathy Petrak
8/29/2022	Added Partner definition and updated Partner Organization to Partner throughout	Cathy Petrak
7/13/2023	Added “Affiliated Entities” throughout to update to an enterprise-wide policy; updated “Staff” definition; updated Partner to “Participant” and Corporate Compliance Officer to “Director of Compliance” throughout; deleted DSRIP Funds Flow section	Cathy Petrak
5/9/2025	Added section VI to define steps for non-compliance with compliance training requirements; Updated “Affiliated Entities” to “Care Compass Entities” throughout. added “Affected Individuals” definition and updates where applicable; added requirement to include training on the role of the Director of Compliance and Compliance Committee, coding and billing best practices and claim development and submissions, and to create an annual training plan with periodic evaluations	Cathy Petrak

This Policy shall be reviewed periodically, but not less than once every 12 months, and updated consistent with the requirements established by the Board of Directors, Care Compass Network’s Leadership Team, Federal and State law(s) and regulations, and applicable accrediting and review organizations.