

Policy Number		Policy/Operational Procedure Name	
COM.0007.V2		Compliance Training and Education	
Sponsor		Custodian	
Rachel Davis		Rachel Davis	
Department Name		Company Name	
Compliance		Alivi	
Effective Date (s)		Review Date	Next Review Date
November 20, 2019		2/1/2024	2/1/2025
Approved By		Policy Location	Citation
Board of Directors		Compliance SharePoint	Medicare Managed Care Manual Chapter 21; 42 C.F.R. §§ 422.503 respectively; False Claims Acts (31 U.S.C. §§ 3729-3733); Federal Criminal False Claims Statutes (18 U.S.C. §§ 287,1001); Anti-Kickback Statute (42 U.S.C. § 1320a-7b(b)); Physician Self-Referral (“Stark”) Statute(42 U.S.C. § 1395nn)

Policy Statement
<p>Alivi will provide effective compliance and fraud, waste and abuse (FWA) training and education annually to ensure its employees, including chief executive or other senior administrators, managers, governing body members, and the organization’s FDRs possess the requisite knowledge and skills to: (a) Comply with all applicable laws, regulations, and company policies; (b) Adhere to appropriate ethical standards, and (c) prevent and detect FWA. The intent of education should be to integrate a culture of compliance and ethical conduct into the organization’s operations. Attendance and participation in formal training is a condition of continued employment and a criterion included in employee evaluations. Trainings will be conducted within thirty (30) days of hire, and at least annually thereafter.</p>
Scope
<ul style="list-style-type: none"> • Inform Alivi employees, including executive, senior administrators, governing body members and organization FDRs of the mandatory requirement to participate in the Alivi compliance education and training program. • Describe the requirements of new hire and annual compliance and FWA training. • Explain the impact of fraud, waste, abuse, and overpayment on the healthcare industry. • Recognize the multiple ways to report compliance or fraud, waste, abuse, and overpayment issues.
Procedure
<p>A comprehensive and structured compliance and fraud, waste and abuse training program are provided to Alivi employees as part of new-hire onboarding and annual training. Employees are required to complete this training within the first 30 days of new hire and annually thereafter. All Alivi employees, managers, chief executive officer and other senior administrators and governing body members, as well as the employees of FDRs, shall receive FWA training, regardless of whether they are full -time, part-time, temporary, volunteer or otherwise.</p> <p><u>A. Initial Training</u></p> <p>Within 30 days of initial hiring or appointment, all Alivi employees and governing body members receive training related to Compliance, FWA, Privacy & Security, and the Alivi Code of Conduct, as part of their new hire training. Upon completion of trainings employees are required to complete a training assessment. A score of ninety percent (90%) or greater is required to pass the</p>

assessment. Upon successfully passing the assessment the employee obtains a certificate of completion. In addition, all new employees are required to certify/attest they have received a copy of the Code of Conduct, understand the contents, and agree to abide by its requirements.

Subject matter will focus on areas such as:

- Content of, and employee responsibilities under, the Compliance Program including pertinent compliance policies and procedures, the Standards of Conduct, and Alivi's commitment to business ethics and compliance.
- Laws and regulations that govern operations of Alivi and its employees.
- A review of policies related to contracting with the government, such as the laws addressing fraud and abuse or gifts and gratuities for Government employees.
- Overview of HIPAA and the importance of maintaining confidentiality of Personal Health Information.
- Requirements for reporting non-compliance issues and an overview of how to ask compliance questions, request compliance clarification or report potential noncompliance. Training will emphasize confidentiality, anonymity, and non-retaliation for compliance related questions or reports of potential noncompliance or FWA.
- Review of the disciplinary guidelines for non-compliance or fraudulent behavior which can result in mandatory retraining and possible termination when such behavior is serious or repeated or when knowledge of a possible violation is not reported.
- Attendance and participation in formal training programs as a condition of continued employment and a criterion to be included in employee evaluations.
- Auditing and monitoring processes of the organization
- A review of potential conflicts of interest and Alivi's disclosure system.

FWA training will include:

- Identifying and combating FWA, including employee such as requesting compliance clarification and reporting potential noncompliance.
- Overview of the laws and regulations related to MA FWA (e.g., False Claims Act, Anti-Kickback statute, HIPAA)
- Reviewing the obligations of FDRs to have appropriate policies and procedures to address FWA
- Process for reporting suspected FWA to Alivi
- Emphasis on the confidentiality, anonymity, and non-retaliation for all compliance related questions or reports of potential noncompliance or FWA.
- Review of the possible types of FWA that can occur.

Specialized In-Service Training:

Each department manager is responsible for ensuring new employees receive job specific specialized training and education necessary to perform their specific duties in compliance with applicable laws, regulation and company policies.

Specialized in-service training should be documented in order to demonstrate training administration. Documentation may include: Date and time of training, attendees (sign-in sheet), training topic(s), materials distributed, and results of the training. The degree of documentation detail should be commensurate with the scope, formality, and delivery method of the training.

B. Annual Training

All employees receive annual compliance and fraud, waste and abuse training. Upon completion of trainings employees are required to complete a training assessment. A score of ninety percent (90%) or greater is required to pass the assessment. Upon successfully passing the assessment the employee obtains a certificate of completion. Training verification is tracked via the online training system. All employees are required, as a condition of employment, to complete the annual training. As part of annual training all employees are further required to review the Code of Ethics & Standards of Conduct and attest to their understanding of the obligations set forth in the Code and their acceptance to abide by the Code

C. "As needed" Training

The Compliance Department and Alivi managers shall ensure employees receive appropriate "as needed" training in response to specific issues that may arise.

Examples of such issues include, but are not necessarily limited to:

- Revisions or additions to applicable laws and regulations
- Specific program guidance or direction from a regulatory agency
- Revisions or additions to Alivi policies and procedures

- Identification of specific compliance or ethical issues
- As required by a corrective action plan

As needed training should be documented in order to demonstrate training administration. Documentation should include: Date and time of training, attendees (sign-in sheet), training topic(s), materials distributed, and results of the training. The degree of documentation detail should be commensurate with the scope, formality, and delivery method of the training.

D. Training and Education for FDRs

Alivi FDRs and their employees involved in the administration or delivery of Part C benefits are required to perform their contracted responsibilities in compliance with Alivi policy, CMS regulatory requirements, and all applicable State laws and regulations.

Alivi requires its FDRs take Alivi’s, or their own, compliance training, where there are sufficient organizational similarities. Alivi FDR’s are required to submit evidence of employee FWA training on an annual basis. Evidence may include training logs, an attestation of completion, or a combination.

- **Compliance Training:** FDRs and their employees must receive compliance training within 30 days of contracting/hire and annually thereafter as a condition of employment. Compliance training includes, but is not limited to, Medicare Advantage general compliance training, Code of Ethics and HIPAA Privacy & Security.

- **FWA Training:** FDRs and their employees must also undergo FWA training within 30 days of contracting/hire and annually thereafter (unless they are deemed by Medicare) covering the topic listed in “Fraud, Waste, and Abuse Training” above. FDRs that have met FWA certifications through enrollment into the Medicare program or accreditation as a durable medical equipment, prosthetics, orthotics, and supplies (DMEPOS) supplier are deemed to have met the FWA training and education requirement. No additional documentation beyond the documentation necessary for proper credentialing is required to establish that an employee or FDR or employee of an FDR is deemed.

E. Reporting and Tracking of Training and Education Plans

The effectiveness of Alivi's training and education plans will be tracked and monitored through the administration of quizzes during the training sessions, regular monitoring of compliance and FWA reporting logs, feedback from employees, and employee compliance evaluations.

If deficiencies are identified, Alivi will undertake remedial actions to correct them.

Electronic certifications are generated after training has been completed. All employee training completion certificates will be saved on Paylocity (or before May 8, 2023- SharePoint) for a minimum period of ten (10) years.

References

None.

Notes

As of May 8, 2023 all compliance training was moved from the ProProfs Training Maker system to Paylocity. All new hires training hired after May 8, 2023 will be completed in Paylocity.

Revision Record

Revision Date	Version Number	Revised by	Revision Description
10/10/2019	v1	Laurie George	Policy created for Board approval

Policy/Operational Procedures



11/20/2019	V1.1	Laurie George	Updated with effective date per Board approval
11/29/2020	V1.1	Maria Kreubel	Reviewed , no changes made.
11/29/2021	V2	Chelsea Garrett	Annual review, custodian updated, updated passing score to 90%
1/16/2023	V2	Rachel Davis	Annual Review and Approval
5/24/2023	V2	Rachel Davis	Added a note that training was moved to Paylocity as of May 8, 2023.
2/1/2024	V2	Rachel Davis	Annual Review; no changes

