

INDEPENDENT CARE HEALTH PLAN PROCEDURE

Department: Compliance/Legal	Policy: Compliance Training
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POLICY: Independent Care Health Plan (*iCare*) has an established Compliance Program. As part of the Compliance Program, all newly hired and current employees, internal service contractors, temporary staff, interns and members of the governing body are trained on their duties and responsibilities to ensure compliance with all required regulations and corporate policies.

Attendance and participation in the Compliance Program training is a condition of continued employment, and failure to comply with training requirements will result in disciplinary action, including possible termination. Adherence to the provisions of the compliance program including training requirements will be a factor in the annual evaluation of each employee.

If at any point an individual believes that he or she has not been provided with sufficient education, that person has a duty to inform his or her supervisor of this issue.

This policy also extends to *iCare's* First Tier, Downstream, and Related Entities (FDRs) performing delegated health care or administrative services related to *iCare's* Medicare contract. *iCare* is required to ensure its FDRs meet CMS compliance program requirements including general compliance orientation and Fraud, Waste, and Abuse training.

PROCESS:

GENERAL COMPLIANCE TRAINING

- 1) The *iCare* Compliance Department and Compliance Committee are responsible for developing, implementing, providing, evaluating, tracking and maintaining a compliance training program. This is done through the *iCare* Learning Portal via Relias.
- 2) All newly hired employees, temporary workers, interns and internal contractors receive the Code of Conduct and general compliance training within sixty (60) days of hire. Current employees receive refresher compliance training, as well as the Code of Conduct, on an annual basis.
- 3) Compliance training consists of, at a minimum, the following elements:
 - a) An overview of the following topics:
 - i) *iCare's* Compliance Program
 - ii) *iCare's* Employee Code of Conduct
 - iii) *iCare's* available reporting mechanisms and lines of communication
 - iv) *iCare's* commitment to non-retribution and non-retaliation
 - v) *iCare's* commitment to confidentiality and anonymity
 - vi) A review of potential conflicts of interest and *iCare's* disclosure system
 - vii) Fraud, Waste, and Abuse
 - viii) Privacy and Security
 - ix) Specific federal regulations including HIPAA, False Claims Act, Anti-Kickback Statute and Ineligible Persons

Effective Date: September 27, 2006	Responsible Department: Compliance
Revision Number: 4	Last Review Date: July, 2016
Last Revision Date: July, 2016	Next Review Date: July, 2018
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- x) Common compliance issues relevant to *iCare*
- 4) Compliance Training materials are kept and maintained in Relias. The Compliance Department, via Relias, is responsible for maintaining the following training records:
 - a) Topic
 - b) Content/Materials
 - c) Attendance
 - d) Results of effectiveness assessments
 - e) Remedial training documentation, if necessary
- 5) The Employee Code of Conduct is available to each employee upon hire and to all staff during annual compliance training through Relias. The Code, along with other related compliance materials, is also available via the intranet on the Compliance Department homepage.
 - a) Employees are instructed to read all of the information carefully and then complete the Final Exam. This exam is an Acknowledgment Form which states that the employee has received, read and understands the Code, but in question format. The exam is to be completed upon hire and annually thereafter.
- 6) Members of *iCare*'s governing body receive the same general compliance or comparable training upon appointment and annually thereafter. Records are maintained by the Compliance Department, via Relias.
- 7) FDRs must receive general compliance orientation and FWA training within 90 days of contracting and annually thereafter. Alternatively, *iCare* may ensure the FDR has a comparable compliance program in place, including FWA training, meeting CMS requirements.

SPECIFIC COMPLIANCE TRAINING

- 1) Employees receive additional specialized training to be determined based on role. Each department is responsible for developing specific compliance training content.
- 2) Each department develops and maintains documentation of specific training provided, including materials, effectiveness assessments, attendance logs and attestations.

Responsible Party: Compliance

References: MMCM Chapter 21

42CFR §422.503(b) (4) (vi) (C)

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42CFR §438.608(b) (3)


Recommended Distribution: All staff via Independent Care Intranet

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Approval:



Thomas Lutzow, President/CEO

6-24-16

Date



Kim Mellen, Director of Compliance

6/22/16

Date

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