

CATHOLIC CHARITIES OF LONG ISLAND
COMPLIANCE PROGRAM POLICIES AND PROCEDURES

SUBJECT: COMPLIANCE TRAINING PLAN

APPROVED BY: Julia Bruno, Acting Compliance Officer

EFFECTIVE DATE: April 12, 2023

REVISED:

POLICY

It is Agency's policy that the following Affected Individuals participate in compliance training and education activities annually: The Compliance Officer, employees, the Chief Executive, other senior administrators, managers, Board of Trustees and any other Affected Individuals. Such training will occur no less frequently than annually and will include applicable laws, regulations and other requirements; how the Agency's Compliance Program operates (including, but not limited to: how and to whom to report issues, confidentiality, the investigation process, corrective actions, disciplinary policies, non-retaliation/non-intimidation policies, risk areas); and the Agency's expectations for Affected Individuals to abide by the Code of Conduct, report issues and assist in their resolution. The training and education will be made a part of the orientation of new compliance officers, employees and Affected Individuals and will occur promptly upon hiring.

TRAINING PLAN.

The training plan includes the following:

1. **Specific Topics** - Subjects or topics in the training and education
 - a. The agency's risk areas and organizational experience
 - b. The Agency's written policies and procedures
 - c. Role of Compliance Officer and Compliance Committee
 - d. How affected individuals can ask questions and report compliance-related issues to the compliance officer and senior management, including the obligation of affected individual 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,

- e. Disciplinary Standards emphasizing the Compliance Program and the prevention of fraud waste and abuse.
- f. How the Agency responds to compliance issues and implements corrective action plans
- g. Requirement specific to the Medicaid program and the Agency's categories of service
- h. Coding and billing requirements and best practices
- i. Claim development and submission process

2. **Timing and frequency** - The timing and frequency of the training, and who is required to attend are noted in the following table:

Affected persons	Frequency	Timing	Notes
Employees (including Chief Executives and administrators and management who are employees)	Within a month of being hired Yearly	January	To be arranged by Program/Department and Human Resources Reminders will be sent to staff to complete their yearly HIPAA and Compliance training by February 1. In addition, the Programs/Departments may supplement compliance training with management supervision (such as in person trainings or emails).
Contractors – i.e., Contractors Agents, Subcontractors, Independent contractors	Yearly	February	The Compliance Officer will send a letter/email with instructions on how to access the Compliance Manual and the policies on Anti-Referral Laws and the False Claims Laws to all Contractors involved with our risk areas.
Governing Body (i.e., Board of Trustees) and Corporate Officers	Within a month of appointment Yearly	September	To be tracked by the Administrative Assistant of the Chief Executive Officer.

3. How attendance will be tracked

- a. Employees will sign off their completion of compliance requirements using the Action Center webpage or send a paper copy to HR. Both these methods will track attendance via Power Tools.
- b. The Compliance Officer will send letters/emails to contractors involved with our risk areas and track receipt slips from registered mail or email.
- c. The Administrative Assistant of the Chief Executive Officer will track training for the Board of Trustees and any corporate officers who are not employees.

4. **How the effectiveness of training will be periodically evaluated** – On an annual basis, the Compliance Officer will select a sample of employees who will participate in taking a pre-training and a post-training test which will be used to determine whether the training is increasing the understanding and knowledge of the Compliance Program.

This continuing education and training effort is of vital importance. Effective communication of applicable laws, regulations and policies will require development of, and participation in, training and educational programs, and may require dissemination of written materials, on a periodic basis. The Compliance Officer will be responsible for identifying and developing training regarding specific compliance risk areas. It is the Agency's intention that, to the extent appropriate, training and educational programs be tailored to those individuals whose job requirements make the information relevant.