

# Compliance Program Training and Education Policy

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## Unity House of Troy, Inc.

Unity House's Compliance Program promotes an organizational culture that encourages all employees, managers, executives, board members, volunteers, interns, vendors, subrecipients, and other affiliates (stakeholders) to conduct agency business ethically and with a commitment to compliance with the law. Unity House's Board of Directors, Executive Office, and Management Team are committed to the success of this program. The Compliance Program provides education and training on compliance requirements and standards, offers guidance, promotes an organizational culture of ethics and compliance, and provides an environment in which our stakeholders can act in good faith without fear of retaliation.

The Compliance Training and Education Program is a critical component of Unity House's Compliance Program and provides stakeholders with a thoughtful curriculum that identifies compliance issues, expectations, and compliance program operation (described in detail below).

## Applicability

The Compliance Training and Education Program is required for all affected individuals, which include employees, managers, executives, board members, volunteers, interns, vendors, subrecipients, and other affiliates or agents.

## Scope

Unity House's Compliance Training and Education Program consists of:

### Orientation

Within 30 days of start date, all affected individuals will receive compliance orientation. Unity House's compliance orientation is the initial point of contact between the Compliance Program and the affected individual, providing an opportunity for the individual to meet the Compliance Officer, learn about the Compliance Program, Compliance Plan, Code of Conduct, other Policies and Procedures as well as reporting systems and Non-Retaliation and Non-Intimidation protections. Affected individuals will be

provided with copies of the Compliance Program materials and provide signatures acknowledging receipt.

## Annual Training

All affected individuals must participate in Unity House's mandatory annual compliance training. Annual Compliance Trainings are reviewed and updated regularly and are tailored to each of the following audiences:

- The Board of Directors
- Management, and
- Employees, volunteers, interns, vendors, subrecipients, etc.

Training for the Board of Directors and Management will be scheduled at least once annually and notice will be given at least two weeks in advance. A make-up session(s) will be scheduled as necessary to ensure all members have been trained. A sign-in sheet will be disbursed to document attendance.

Compliance training for other affected individuals will be incorporated into the agency's regular training schedule and is expected to be offered at least quarterly but may be offered monthly or more frequently as necessary to ensure all individuals can participate. Sign-in sheets will be used to document attendance. Attendance will also be entered into Unity House's Paychex system, which tracks attendance for mandatory training by employee.

The compliance training consists of:

- Compliance Issues
  - Definitions of Fraud, Waste and Abuse
  - Examples of compliance issues in each of the following areas:
    - Billings
    - Payments
    - Medical necessity and quality of care
    - Governance
    - Mandatory reporting
    - Credentialing, and
    - Other risk areas identified by Unity House.
  - Guidance on dealing with compliance issues.
  - How to communicate compliance issues.

- Guidance on how potential compliance problems are investigated and resolved.
- Compliance Expectations
  - Expectations related to conduct that supports integrity in operations.
  - Introduction to the Compliance Program's policies and procedures and an examination of compliance expectations.
  - Reporting procedures and identification of the Compliance Officer.
  - Review of disciplinary policies related to the Compliance Program.
    - Expectations for reporting compliance issues.
    - Expectations for assisting in the resolution of compliance issues.
    - Sanctions for failing to report suspected problems.
    - Sanctions for participating in non-compliant behavior.
    - Sanctions for encouraging, directing, facilitating or permitting non-compliant behavior.
    - Expectations that compliance-related disciplinary policies are fairly and firmly enforced.
  - Review of Non-Retaliation and Non-Intimidation Policy.
- Compliance Program Operation
  - Identification of the Compliance Officer and her interactions with Management and the Board of Directors.
  - Compliance Workgroups Overview
  - Compliance Plan Overview
    - The system for identifying compliance risk areas.
    - System for self-evaluation of risk areas (internal monitoring, internal audits, and external audits)
    - System for responding to compliance issues.
      - Introduction to policies and procedures related to investigation and resolution.
      - System to respond to compliance issues as they are raised.
      - System for responding to compliance issues as they are identified through self-assessment.

- System for correcting compliance problems promptly and thoroughly.
- System for implementing policies, procedures, and systems necessary to reduce the potential for reoccurrence.
- System for identifying and reporting compliance issues to DOH or OMIG.
- System for refunding Medicaid overpayments.
- Question and Answer

## Other Compliance Education Efforts

Unity House believes it is crucial that compliance and high standards of ethics guide our business standards and operations and are integral to our corporate culture. As thus, we make ongoing efforts throughout the year to make meaningful connections between the Compliance Program and our employees.

### Compliance on the Intranet and Website

The Compliance Program hosts pages on Unity House's Intranet and website to allow for stakeholders' easy access of Compliance Program materials and information.

### Compliance World Tour

In the first quarter of the year, the Compliance Officer will visit each Unity House Program and Department to distribute the annual Compliance Plan and Code of Conduct. During the visits, the Compliance Officer will provide an overview of any changes or updates to the documents as well as a forum to discuss compliance efforts with the group.

### Program and Department-specific Compliance Education

In an effort to promote compliance, high standards of professional ethics, and quality of care, the Compliance Officer will work with Unity House's Directors to develop and deliver on-going, targeted education to their staffs throughout the year.

### Compliance Workgroups

Compliance Workgroups are designed to bring together key personnel from each of the programs and departments to focus on compliance and expand the reach of the Compliance Program. Compliance Workgroups also provide a forum to disburse new information and guidance as it's released and allows the workgroups to develop new policies and procedures or other actions in a timely and efficient manner.