

# 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, contractors, subcontractors, independent contractors, and other affected individuals 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).

"Affected individuals" means all persons who are affected by the required provider's risk areas, including the required provider's employees, managers, contractors, agents, subcontractors, independent contractors, and governing body and corporate offices.

## Applicability

The Compliance Training and Education Program is required for all affected individuals, which include employees, managers, executives, contractors, 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, Standards of Conduct, other Policies and Procedures as well as

Effective 1/1/2023

Compliance Program

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Revised 11/15/2023

Training and Education Policy

Reviewed 12/9/2025

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,
- Chief Executives,
- Senior Administrators,
- Senior Management, and
- Employees, volunteers, interns, vendors, contractors, agents, subrecipients, corporate offices 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. Training attendance is tracked and kept on file.

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 or more frequently as necessary to ensure all individuals can participate. Sign-in sheets will be used to document attendance. Attendance will be entered into Unity House's Paychex (ADP) system, which tracks attendance for mandatory training by employee.

The compliance training consists of:

- Compliance Issues
  - Definitions of Fraud, Waste and Abuse
  - Risk areas and organizational experience.
  - Examples of compliance issues in each of the following areas:
    - Billings and coding
    - Payments
    - Medical necessity and quality of care
    - Governance
    - Mandatory reporting
    - Ordered services
    - Contractor, subcontractor, agent, or independent contract oversight
    - Credentialing, and

- Other risk areas identified by Unity House.
- Guidance on dealing with compliance issues.
- How to communicate compliance issues.
- How affected individuals can ask questions and report potential compliance-related 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 written policies and procedures and an examination of compliance expectations.
  - Reporting procedures and identification of the Compliance Officer.
  - The role of the Compliance Officer and the Compliance Committee.
  - Review of disciplinary policies related to the Compliance Program.
    - Expectations for reporting compliance issues and corrective action plans.
    - 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-Intimidation and Non-Retaliation Policy and protections in place, including protections from intimidation retaliation.
- Compliance Program Operation
  - Identification of the Compliance Officer and her interactions with Management and the Board of Directors.
  - Compliance Committee 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 through the OMIG Self-Disclosure Process.
- 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. The Compliance Officer uses a pre-test and post-test for New Employee Compliance Orientation and a post-test for the annual refresher training to assess participant learning.

### Compliance on the Intranet and Website

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

### 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 Committee

The Corporate Compliance Committee consists of senior management members and board members who oversee Unity House's Medicaid programs and Finance and HR Departments. The Corporate Compliance Committee assists the Compliance Officer in the development, implementation, oversight, and evaluation of the effectiveness of its compliance program. Guided by the Compliance Officer.