



## **COMPLIANCE TRAINING POLICY**

### **PURPOSE**

The purpose of this Policy is to establish compliance training and education requirements for Jewish Home of Central New York, Inc., Menorah Park Group Residences, Inc., and Syracuse Jewish Family Services, Inc. (collectively, the “Organization”).

### **APPLICABILITY**

This Policy applies to all Organization employees, Board members, and contractors.<sup>1</sup>

### **POLICY**

The proper education and training of personnel at all levels is a key element of an effective Compliance Program. The Organization has established and implemented an effective compliance training program. All Organization employees (including the Compliance Officer, senior administrators and managers), Board members, and contractors will receive training promptly at orientation or appointment, and at a minimum annually thereafter, regarding the Compliance Program and job-specific training as it pertains to compliance matters. Training and education will be provided by the Organization in a form and format that is accessible and understandable to all employees, contractors, and Board members, consistent with federal and New York State language and other applicable laws, rules, and policies.

### **PROCEDURE**

1. All new employees of the Organization will receive Compliance Program training during orientation, which occurs which occurs promptly upon hiring and no later than the first thirty (30) days of employment, and at least once annually thereafter. This compliance training will include at least each of the training and education program areas set forth in Section 6, below. Employees will be afforded an opportunity to ask questions and receive responses to any questions they have in order for training to be

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<sup>1</sup> “Employees, contractors, and Board members” includes the Organization’s employees, Chief Executive Officer (“CEO”), senior administrators, managers, volunteers, interns, contractors, agents, subcontractors, independent contractors, corporate officers, and Board members who are affected by the Organization’s Compliance Risk Areas. “Compliance Risk Areas” are those areas of operation affected by the Organization’s Compliance Program, as set forth in Section XIII of the Organization’s Compliance Plan. For purposes of the Organization’s Compliance Program, “contractors” includes contractors, agents, subcontractors, and independent contractors who are affected by the Organization’s Compliance Risk Areas. Contractors are required to comply with the Organization’s Compliance Program to the extent that the contractor is affected by the Organization’s Compliance Risk Areas, and only within the scope of the contractor’s contracted authority and affected Compliance Risk Areas.

considered complete. Each employee will be required to sign a form indicating receipt of the Compliance Plan and completion of the training. This document will be retained for no less than six (6) years. The Compliance Officer, Human Resources Director, or their designee will be responsible for conducting this training.

2. Annually, the Organization provides a Compliance Program refresher training for employees (including the Compliance Officer, senior administrators and managers), contractors, and the Board of Directors. This Compliance Program refresher training will, at a minimum, cover each of the training and education program areas set forth in Section 6, below. The Compliance Officer and/or Human Resources Director will be responsible for scheduling refresher training sessions for employees. Additional Compliance Program refresher trainings will be provided to employees, contractors, and Board members on an as needed basis.

The Organization will maintain records of all Compliance Program refresher trainings for six (6) years. The records maintained will include, but not be limited to, course descriptions, frequency of training, and hours of each training session. The Compliance Officer, Director of Human Resources, or their designee(s) will be responsible for conducting Compliance Program refresher trainings.

3. The Compliance Officer, in consultation with each program director, will determine whether it is necessary and appropriate to develop a curriculum of supplemental compliance training for employees. Supplemental compliance training will consist of in-depth guidance on fraud prevention and other compliance issues arising in connection with the operation of a specific program. This customized targeted compliance training will be in addition to the initial and annual compliance training and education provided to all employees, Board members, and contractors. Employees shall have access to all policies and procedures relevant to the performance of their duties. All supplemental compliance training curricula must be approved by the Compliance Officer. The Organization shall keep records for six (6) years of all supplemental compliance training programs, including course descriptions, frequency of training, and hours of each training session.
4. All members of the Organization's Board of Directors will receive compliance training promptly upon appointment and within thirty (30) days of their appointment to the Board and at least once annually thereafter. The Compliance Officer will be responsible for developing this training program, which will cover, at a minimum, each of the training and education program areas set forth in Section 6, below. Board members must acknowledge in writing that they have received training, understand the Standards of Conduct, and agree to fulfill their obligations under the Compliance Plan. This documentation will be retained for no less than six (6) years.
5. Contractors (as defined in this Policy) must participate in compliance training either prior to contracting with the Organization or within thirty (30) days of contracting with the Organization, and at least once annually thereafter. The compliance training given

to contractors will cover, at a minimum, each of the training and education program areas set forth in Section 6, below. The training may consist of providing the contractor with the Organization's Compliance Plan and Compliance Program policies and procedures for self-study, and affording the contractor the opportunity to ask questions and receive responses about the Plan and Program. The Organization shall maintain a dated distribution letter and require contractors to complete an acknowledgement evidencing that compliance training and education occurred. See **(i) Deficit Reduction Act (DRA) Fraud Prevention Policy and (ii) DRA Letter for Contractors.**

6. Training programs will include an overview of all elements of the Compliance Program as described in the Compliance Plan and compliance policies. All Compliance Program training and education will include, at a minimum, the following topics:
  - a. The Organization's Compliance Risk Areas and Organizational Experience;<sup>2</sup>
  - b. The Organization's written policies and procedures related to its Compliance Plan and Compliance Program;
  - c. Individual's obligation to participate in the Organization's Compliance Program;
  - d. The types of issues that constitute Compliance Issues (actual or suspected fraud, waste, abuse, or other wrongful or unethical conduct, violations of law, regulations, rules, policies, and standards, or the Organization's Compliance Plan, policies, and procedures);
  - e. Individual's obligation to participate in the Organization's Compliance Program;
  - f. Individual's obligation to report Compliance Issues in good faith and methods for reporting (including method for anonymous and confidential reporting) to the Compliance Officer and others;
  - g. The individual's ability to ask questions regarding the Organization's Compliance Program and Compliance Plan;
  - h. The Compliance Officer's and Compliance Committee's role and their interactions with management and the Board of Directors;
  - i. Organization's identification of compliance risk areas and current compliance issues and enforcement;

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<sup>2</sup> "Organizational Experience" means the Organization's: (1) knowledge, skill, practice and understanding in operating its Compliance Program; (2) identification of any issues or risk areas in the course of its internal monitoring and auditing activities; (3) experience, knowledge, skill, practice and understanding of its participation in the Medicaid Program and the results of any audits, investigations, or reviews it has been the subject of; or (4) awareness of any issues it should have reasonably become aware of for its category or categories of service.

- j. How internal and external audits and investigations are handled and an individual's obligation to assist in audits and investigations as requested;
- k. Various types of remedial measures and Corrective Action Plans for non-compliance, including how the Organization responds to Compliance Issues and implements corrective action plans;
- l. The consequences of failure to comply with the Compliance Plan and Compliance Program (*i.e.* discipline, termination, and liability) and information about non-intimidation and non-retaliation policies;
- m. Responsibilities of supervisors/managers to detect and report Compliance Issues;
- n. Overview of relevant laws and requirements, including requirements related to reporting overpayments;
- o. The requirements specific to the Medicaid Program and the Organization's categories of service; and
- p. If applicable, coding and billing requirements and best practices, and the claim development and submission process.

The Compliance Officer, with the assistance of the Human Resources Director shall be responsible for implementing this policy.

- 7. The Compliance Officer, with the assistance of the Director of Human Resources, shall be responsible for implementing this Policy and for developing and maintaining a compliance training plan. The training plan will, at a minimum, outline the following:
  - a. The subjects or topics for training and education;
  - b. The timing and frequency of the training;
  - c. Which employees, contractors, and Board members are required to attend;
  - d. How attendance is tracked; and
  - e. How the effectiveness of the training will be periodically evaluated (*e.g.*, pre- and post-tests, surveys, etc.).

The training plan shall be periodically updated by the Compliance Officer, with the assistance of the Director of Human Resources, to indicate the outcome of the various trainings provided by the Organization throughout the year. These periodic updates will include the following information, as applicable:

- a. A list of the employees, Board members, and contractors that received, or did not receive, the Compliance Program training during the year covering the training plan including the name and role of the individual (*e.g.*, employee,

CEO, senior administrator, manager, contractor, Board member, corporate officer, etc.);

- b. The type of compliance training(s) received (e.g., annual, orientation, both);
- c. The format in which the training was provided;
- d. The date(s) of completion; and
- e. The date of hire for those who received initial Compliance Program training.

Adopted: May 18, 2021

Revised & Adopted: March 21, 2023; \_\_\_\_\_, 2023