

SELFHHELP COMMUNITY SERVICES, INC.		Policy #: 15
CORPORATE COMPLIANCE POLICY AND PROCEDURE MANUAL		Page 1 of 2
Subject: Corporate Compliance Education & Training	Effective Date January 2006	Revision Date 03/2008 10/2013, 8/2023
Section: Corporate Compliance Education		

POLICY:

All personnel, including board members, employees, senior administrators, executive staff, managers, contractors, subcontractors, consultants, independent contractors and other agents of Selfhelp who are affected by Selfhelp's risk areas will be given access to or receive a copy of and be educated on the Corporate Compliance Program and Code of Conduct & Ethical Behavior at hire or within (30) days of the beginning of their relationship with any entity of Selfhelp Community Services, Inc.

PROCEDURE:

1. The Corporate Compliance Committee shall develop a training plan which shall at a minimum, outline the subjects or topics for training and education, the timing and frequency of the training, which affected individuals are required to attend, how attendance will be tracked, and how the effectiveness of the training will be periodically evaluated.
2. Training and education shall be provided in a form and format accessible and understandable to all affected individuals, consistent with Federal and State language and other access laws, rules or policies.
3. All new employees hired to any entity of Selfhelp Community Services, Inc., will be provided access to and be educated on the *Corporate Compliance Program and Code of Conduct & Ethical Behavior* that may be administered through an online platform by Human Resources during the organization general orientation session.
4. A *Corporate Compliance Certification* will be signed by the employee at the end of the training and will be filed in the employee's personnel record. Board members' signed forms should be sent to the Chair of the Board.
5. All contractors, subcontractors, consultants, independent contractors, other agents of Selfhelp will also receive a copy of and a review of the *Corporate*

Compliance Program and Code of Conduct & Ethical Behavior. An attestation of receipt and review will be maintained in the contractor file.

6. A review of the *Corporate Compliance Program and Code of Conduct & Ethical Behavior* will be conducted with employees, contractors, subcontractors, and consultants, independent contractors, other agents of Selfhelp no less than annually and when there are revisions to the Program or to any policy of the program.
7. At minimum, the initial education and annual review to employees includes:
 - A) Corporate Compliance Program Objectives & Benefits
 - B) An overview of the Corporate Compliance Policies including but not limited to:
 1. the required provider's risk areas and organizational experience;
 2. Strategies and Disciplinary Standards to Prevent and Detect Fraud, Waste and Abuse: Auditing and Monitoring
 3. Organizational Relationships
 - a) the role of the compliance officer and the compliance committee
 - b) Conflicts of Interest
 - c) Gifts and Gratuities
 - d) Marketing
 - e) Vendors and Suppliers
 4. Retention of Records and Record Keeping
 5. The False Claims Act & Non-Retaliation
 6. Reporting of Violations
 7. Investigation, Response to Compliance Issues and Implementation of Corrective Action Plans
 8. Mandate to Participate in Corporate Compliance
 9. Requirements specific to the MA program and the required provider's category or categories of service;
 10. Coding and billing requirements and best practices, if applicable;
 11. Claim development and the submission process

8. In accordance with Corporate Compliance Program every program director will conduct an employee orientation upon hire including policies, procedures and practices on how to conduct the day-to-day activities of their positions in accordance with federal, state, local, regulations and contractual requirements.
9. Every department will host staff training involving changes in policies to ensure that employees have the tools and resources to comply with applicable laws.
10. All training of employees is documented on an individual attestation or certification record.
11. All documentation of employee training is forwarded to Human Resources to be filed in each individual employee's personnel record.