



29 British American Boulevard, 2nd Floor
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thearcny.org

[Policy Number]: Education & Training of Employees and Others

Category: Corporate Compliance Effective Date: XXXXXXXX
Department: XXXXXXXXXXXXXXXXXXXXXXXX Last Revision Date(s): 6/10/2020

POLICY STATEMENT

The [Chapter] sets as a goal that, at the completion of all initial training, *any* employee of the organization that is approached can provide essential information regarding the compliance program (e.g., the names of the Compliance Officers, reporting mechanisms, familiarity with Code of Conduct) and can provide detailed information regarding their specific job responsibilities. The [Chapter] also requires that certain independent contractors be trained on the Corporate Compliance Plan and on policies and procedures that relate to their provision of services to the [Chapter].

This policy applies to all [Chapter] Board members, staff and independent contractors identified by the [Chapter] as requiring training. Attendance at training sessions is mandatory and is a condition of continued employment or contracting. Training includes initial orientation as well as ongoing education at regular intervals.

PROCEDURE

A. New Employees / New Independent Contractors

As part of their initial orientation, all new employees and independent contractors will receive a training session within the first thirty (30) days of employment or contracting as part of the general orientation program. The purpose of this training program is to discuss the goals and objectives of the Corporate Compliance Program and familiarize new employees and contractors with the Corporate Compliance Program.

At the conclusion of the orientation session, new employees and independent contractors will be asked to sign an acknowledgment that they are aware of and will abide by the Corporate Compliance Program and Code of Conduct. The Acknowledgment Form is attached to the [Code of Conduct Policy as Exhibit ____].



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Copies of the acknowledgement will be kept in the employee's personnel file, and in the files of the Compliance Officer. These files will be subject to review and audit by the Compliance Officer.

B. Existing Employees

1. Staff

All existing employees will receive a training session at least once a year with respect to the Corporate Compliance Program and Code of Conduct. In this training session, employees will review the existing Corporate Compliance Program, the Code of Conduct, any applicable policies and procedures and will discuss any changes or suggested changes in these policies and procedures. The training session also will focus upon changes in federal laws and regulations affecting the [Chapter] and recent government enforcement actions. This training session will be conducted at the direction of the Board of Directors, the Corporate Compliance Committee, the Compliance Officer or the [Executive Director].

At the direction of the Board of Directors, the Corporate Compliance Committee, the Compliance Officer or the [Executive Director], additional training sessions may be held as the need arises to address changes in the Corporate Compliance Plan, state or federal laws and regulations, or any issues of interest. Additional, specialized training sessions will be conducted for employees who have responsibilities that raise specific compliance issues, such as employees responsible for billing government programs. In addition, the Compliance Officer or the [Executive Director] may direct specific employees to attend continuing education classes.

Each employee must attend at least [three] hours of Corporate Compliance Plan training annually. An employee returning from extended leave who has missed a regularly scheduled training session, must complete the training session within



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thirty (30) days of return. Participation in and attendance at training sessions is mandatory and attendance of training sessions will be one criteria for which employees will be evaluated during their reviews.

2. Managers

The Compliance Officer may develop specific training programs for supervisors and managers so that these employees are trained to answer questions and respond to situations regarding the compliance program. Supervisors and managers may be sanctioned if they fail to provide such instruction and/or fail to detect non-compliance with applicable policies and legal requirements where reasonable diligence on the part of the manager or supervisor would have led to the discovery of any problems or violations and given the [Chapter] an opportunity to correct them earlier.

C. Independent Contractors, Agents & Vendors

The Compliance Officer shall develop a training program for independent contractors, agents and vendors consistent with the training provided to employees on the Corporate Compliance Plan and the Code of Conduct. The Compliance Officer may require the independent contractor to be trained on areas of risk that touch upon the services provided by contractors.

D. Acknowledgement Forms

All employees and independent contractors will be asked to sign attendance sheets immediately after each training session. A sample Corporate Compliance Program Training Program Attendance Sign-In Sheet is attached as Exhibit A. The individual conducting the training will take attendance at all training sessions with a sign-in sheet and will maintain a record of course attendance at any



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training session which is performed as part of the Corporate Compliance Program. The Compliance Officer shall maintain a file with copies of attendance forms for all employees.

E. Testing

At the discretion of the Compliance Officer and the Corporate Compliance Committee, the [Chapter] will utilize post-training tests following training sessions to evaluate comprehension. Individuals who do not receive an acceptable score either must attend another training session or receive additional one-on-one training at the discretion of the Compliance Officer.

F. Reports

The Compliance Officer shall maintain a record of all training conducted at the [Chapter] and shall make this information available to the Board of Directors and the Corporate Compliance Committee during meetings.

G. Development of Training Programs & Materials

The Compliance Officer and the Corporate Compliance Committee shall be responsible for monitoring, developing and conducting the training curriculum and orientation sessions. The Compliance Officer shall keep a written record of all such training sessions.

In the presentation of its training, the [Chapter] will endeavor to utilize available technology, when appropriate, different formats for efficiently and effectively conducting compliance program training sessions, such as in-person seminars, compliance training videos, computer-based instructional programs and intranet websites.



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The trainers who offer compliance training shall be fully knowledgeable about the Corporate Compliance Plan and related policies and procedures, including the Code of Conduct and those federal and state laws and regulations that are the subject of the topic being addressed in a training session. Trainers who are asked questions about areas that they are not able to answer shall arrange for follow-up to be conducted by another member of the [Chapter] management team who is familiar with the answer to these areas.

In addition to traditional forms of “training,” the [Chapter] will use periodic newsletters and emails to update employees on compliance related issues, as appropriate, to remind employees that they need to be cognizant of compliance issues.

H. Topics Covered in Training Programs

Compliance education programs, at a minimum, will include information on the following aspects of the Corporate Compliance Program: (a) the Code of Conduct; (b) internal communications channels (e.g., access to the Compliance Officer, the Hotline); (c) organizational expectations for reporting problems and concerns; and (d) the non-retaliation policy for reporting made in good faith. Specialized areas for education and training include: (a) government and private payor reimbursement principles; (b) government initiatives related to the services provided by the [Chapter]; (c) the general prohibition on paying or receiving remuneration for referrals of clients; (d) requirements for billing and documentation of services, including a prohibition against signing for the work of another individual and alterations to medical records; and (e) state and federal confidentiality laws.

I. Enforcement

Employees shall be informed during the training session that strict compliance with the Corporate Compliance Plan and the Code of Conduct is a condition of



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employment and that compliance with the Corporate Compliance Plan and the Code of Conduct is one criteria upon which employees will be evaluated. Independent contractors identified by the Compliance Officer as needing training shall be required to attend training as a condition for the continuation of their arrangement with the [Chapter].

Failure to attend a training session conducted pursuant to the Corporate Compliance Program shall result in disciplinary procedures, up to and including discharge or termination from employment or termination of an independent contractor arrangement. The [Discipline Policy] provides additional details on options for discipline and corrective action.

Exhibits:

Exhibit A - Corporate Compliance Plan Employee Training Program Attendance & Sign-In Sheet



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Exhibit A

**[CHAPTER] CORPORATE COMPLIANCE PLAN
TRAINING PROGRAM ATTENDANCE AND SIGN-IN SHEET**

Corporate Compliance Plan Training Session Date: _____

Subject of Training Session: _____

Length of Training Session: _____

* * * * *

Attendance:

Name	Title/Company	Signature	Date
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

I hereby certify that all individuals listed on the above list attended the Corporate Compliance Plan Training Session described above.

Attached is a copy of the written agenda and training materials provided during this session.

Signature of Individual
Conducting Training Session

Date



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