

## MADISON COUNTY POLICY AND PROCEDURES

**Subject:** **Compliance Policy:**  
Employee, Board, and Independent Contractor Compliance Training

**Issued:** April 5, 2012  
**Approved:** December 27, 2012  
**Revised:** August 20, 2013  
August 26, 2014

### **Purpose:**

The development and implementation of regular, effective education and training seminars is an integral part of the compliance program. Compliance education is divided into two general components. First, all employees, Board members, and independent contractors must receive an introduction to the compliance program. Second, those parties whose work is linked to identified risk areas should receive specialized compliance education pertaining to their function and responsibilities.

### **Policy:**

1. All employees, Board members and independent contractors that provide direct health and medical services (i.e. therapists, physicians), hereafter identified as Class A, will receive training related to the organization's overall compliance program. Independent contractors who do not provide direct health and medical services, hereafter referred to as Class B, will have language regarding the corporate compliance policy within their contracts.
2. Employees in the Public Health and Mental Health Departments, Class A independent contractors, and members of the Board of Supervisors, Board of Health and Community Services Board will receive more detailed education related to their function and responsibilities. Class B independent contractors will have language regarding the corporate compliance policy within their contracts.
3. Attendance at training sessions and/or completion of online training is mandatory and is a condition of continued employment for all Madison County employees (whether Class A or B) or Board membership (Board of Supervisors, Public Health Board or Community Services Board) according to the schedule under "Procedures" below or to be considered for contracting with Madison County according to the schedule under "Procedures" below.

### **Procedures:**

1. The Compliance Officer is responsible for developing the compliance education curriculum and monitoring and ensuring that compliance training and orientation meet the policy standards on this subject.
2. Compliance education seminars must include an explanation of the structure and operation of the compliance program. They will introduce the Compliance officer to the organization.

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3. Compliance education seminars, at a minimum, will include information on the following aspects of the compliance program:

- Code of Conduct and other related written guidance;
- False Claims Act;
- Whistleblower Provisions;
- New York False Claims Act;
- Communication channels (name of Compliance Officer, reporting mechanisms, hotline);
- Organizational expectations for reporting problems and concerns; and
- Non-retaliation policy.

Specialized areas for education will include, but not be limited to the following:

- Improper or fraudulent billing for services;
- Preparation of inaccurate or incorrect cost reports;
- Misuse of Madison County (sometimes referred to as “County” or “the County”) funds;
- Payment or receipt of remuneration or gifts in return for client referrals;
- Government and private payer reimbursement principles; and
- Government initiatives related to the services provided by the County.

4. Comprehensive education materials will be developed to facilitate the compliance sessions and ensure that a consistent message is delivered to all employees, Board members, and independent contractors. Education protocols and materials must be standardized, so as to evidence that everyone attending a seminar receives the same instruction. All materials (training, plan, policies, forms, and video) will be hosted electronically.

5. As part of his or her initial orientation, each employee, newly contracted Class A independent contractor, and newly elected or appointed Board member shall receive a training session, whether in person or online, within the first thirty (30) days of employment, contracting or appointment. Each employee, Class A independent contractor, and Board member will receive, either by hardcopy or online, an introduction to Madison County’s compliance program and objectives, the Code of Conduct, compliance plan, and compliance policies. Each new employee, Class A independent contractor, and Board member will sign an acknowledgement form (attached to this policy) that they are aware of and will abide by the compliance program and Code of Conduct. Class B independent contractors will have language regarding the corporate compliance policy within their contracts.

6. All existing employees within the Public Health and Mental Health departments and existing Class A independent contractors will receive a training session, either in person or online, at least once per year, that includes a review of the existing compliance program, the Code of Conduct, and any applicable policies and procedures. The session will also focus on any changes in federal or state laws and regulations.

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7. All other existing employees will receive a training session, either in person or online, at least once every other year, that includes a review of the existing compliance program, the Code of Conduct, and any applicable policies and procedures. The session will also focus on any changes in federal or state laws and regulations.
8. All existing or re-elected Board members will receive a training session, either in person or online, at least once every other year that includes a review of the existing compliance program, the Code of Conduct, and any applicable policies and procedures. The session will also focus on any changes in federal or state laws and regulations.
9. Verification of education and training relating to the compliance program, whether in person or online, will be tracked, recording the date, start and end time of the session, and the content of the material presented. The Compliance Officer will maintain a file of attendance forms for all training sessions.
10. Employees, independent contractors, and Board members will be provided with the opportunity to seek clarification or more information on any aspect of the compliance program. Trainers who are not able to answer specific questions will arrange for follow-up to be conducted by the Compliance Officer or member of senior management. In regard to electronic training, clarification on any aspects of the compliance program is to be referred to the Compliance Officer or a member of senior management.
11. Only properly trained individuals approved by the Corporate Compliance Committee will be used to provide compliance education and training seminars. Compliance program trainers must be knowledgeable of the (a) compliance program; (b) applicable federal laws and regulations; (c) requirements of the Federal Sentencing Guidelines; (d) relevant organization policies/procedures; (e) operations of the compliance program; and (f) content of the Code of Conduct.
12. The Compliance Officer is responsible for coordinating with management to ensure that specialized compliance education occurs in identified risk areas.
13. Managers shall assist the Compliance Officer in identifying areas that require specific training and are responsible for communication of terms of the compliance plan to all independent contractors doing business with the County.
14. Madison County will ensure that the Compliance Officer has sufficient opportunities to receive training on compliance issues.
15. The Compliance Officer is also responsible for submitting periodic reports to the Compliance Committee and Board of Supervisors on all education seminars related to the compliance program.