



## Corporate Compliance Education and Training

### Current Policy/Procedure Information

<b>Policy/Procedure Number</b>	<b>Resolution Number</b>	<b>Revision Date</b>	<b>Next Scheduled Review</b>	<b>Responsible Department/Individual</b>
COMP 1.3	N/A	N/A	June 2025	Compliance Office, Human Resources, DCS, DPH



Corporate Compliance Education and Training

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**I. Purpose**

The County of Sullivan is committed to the operation of an effective compliance program and understands education serves as the basis from which all other aspects of this program arise. The development and implementation of effective compliance education and training is an integral component of the County's Corporate Compliance Program. Therefore, the County established the Corporate Compliance Program Education and Training Plan to provide accurate and sufficient compliance training to all affected individuals to ensure compliance and to ensure all stakeholders are well versed on "the County's" proper organizational processes pursuant to Title 18 Part 521.

**II. Scope**

This procedure applies to all County employees, contractors, vendors, interns, and volunteers.

**III. Reference**

Resolution No. 305-19, 18 NYCRR 521-1.4(d); SSL § 363-d, Administrative Directive CM-2024-1, COMP 2.4.

**IV. Definitions and Key Terms**

Affected Individuals – County employees, contractors, vendors, interns, and volunteers.

Department of Public Health – DPS

Department of Community Services – DCS

**V. Procedure**

1. The County will develop and maintain a Corporate Compliance Education and Training Plan pursuant to the requirements in NYCRR Title 18 Part 521;
2. At a minimum, the Corporate Compliance Education and Training Plan shall: (1) outline the subjects or topics for training and education, (2) the timing and frequency of the training, (3) which affected individuals are required to attend, (4) how attendance will be tracked, and (5) how the effectiveness of the training will be periodically evaluated;
3. The Corporate Compliance Education and Training Plan shall include at a minimum: (1) the County's risk areas and organizational experience, (2) written policies and procedures, (3) the role of the Corporate Compliance Officer, Compliance Program Coordinator, and the Corporate Compliance Committee, (4) how affected individuals can ask questions and report potential compliance-related issues to the Corporate Compliance Officer, including the obligation of affected individuals to report suspected unlawful and unethical conduct and the procedures for submitting such reports, and the protection from intimidation and retaliation for good faith participation in the compliance program, (5) disciplinary standards, with an emphasis on those

- standards related to the County's Corporate Compliance Program and the prevention of fraud, waste, and abuse, (6) how the County responds to compliance issues and implements corrective action plans, (7) requirements specific to the Medical Assistance (MA) program and the County's category or categories of service, (8) coding and billing requirements and best practices, and (9) claim development and the submission process;
4. To underscore the importance of a compliant and regulatory environment, the County's Vendors, Contractors, and anyone doing business with the County are subject to adhering to the County's Corporate Compliance program to the extent of their contracted roles and responsibilities within the County's identified risk areas;
  5. The Compliance Office will coordinate with the County Attorney's Office to insert Corporate Compliance program language and associated policy/procedure and training links into contractual agreements;
  6. Excluding County contractors and vendors, all other individuals defined as affected individuals shall complete the Corporate Compliance Education and Training program promptly upon hiring;
  7. All affected individuals shall complete the Corporate Compliance Education and Training program on an annual basis thereafter;
  8. Promptly upon a fully executed Agreement, County contractors and vendors doing business with the County shall complete the Corporate Compliance Education and Training for all its organizational employees performing services for the County;
  9. Adherence to the provisions of the Corporate Compliance program, such as training requirements, should be a factor in the annual evaluation of each employee;
  10. Failure to comply with training requirements could result in disciplinary actions and sanctions including and up to possible termination or termination of contract, when such failure is serious;
  11. Education and training 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;
  12. All affected individuals are to be provided ample instruction and education relating to proper compliance principles. If, at any point, any individual believes that they are not provided with sufficient education or the opportunity to avail themselves of the necessary education, that person has an absolute duty to inform the Compliance Office, a member of the Corporate Compliance Committee, or their supervisor of this issue;
  13. Affected individuals may request a copy of compliance policies and procedures from the Compliance Office;
  14. All affected individuals will be provided or linked to the County's Corporate Compliance Program's policies and procedures;
  15. Corporate Compliance policies and procedures will be made available on the County's Compliance Program webpage and the SC Portal;
  16. The Corporate Compliance Officer shall coordinate with required departments to ensure that role and risk-based training occurs in identified risk areas within 30 days of on-boarding;
  17. Role and risk-based training may include, but not be limited to the following areas: (1) Sullivan County Legislature, (2) financial reporting and the Self-Disclosure Program, (3) identification and prevention of waste, fraud, and abuse, (4) procedures for addressing billing errors, voids, adjustments, and overpayments, (5) understanding and compliance with the False Claims Act, (6) specific training on Electronic Visit Verification (EVV) risks, emphasizing the importance of

- adhering to EVV protocols for claim submissions and ensuring that claims are only submitted for services rendered, (7) management teams, (8) clinicians providing patient services, (9) timekeeping staff, and (10) for contractors and vendors, include a section emphasizing their requirement to review our education and training programs annually, as stipulated in their contracts. Contractual language to reference compliance and legal requirements for vendors, confidentiality and data protection, ethical conduct, non-compliance reporting procedures, and updates on policy changes and industry standards;
18. DPS and DCS shall develop and maintain a cultural competency training tracking sheet categorized by dates of annual competency training and self-attestation for each MMCO, aligning with CMS compliance requirements;
  19. Per CM-2024-1, DPH and DCS shall submit the respective MMCO's cultural competency training attestation to the County Manager's Office for review and approval prior to submission;
  20. Records of live compliance education and training of employee's, including attendance logs and material distributed at training sessions will be retained by the Compliance Program Coordinator;
  21. The Compliance Office will coordinate computer-based education efforts with the Human Resources Division;
  22. All records of Corporate Compliance Education and Training including its format, curriculum, date, duration, attendance logs, and attestations to be retained in according with Title 18 Part 521-1.3(b);
  23. The Human Resources Division will assign and track trainings for employees through the County's Learning Management System provider;
  24. To assess County contractor and vendor understanding and adherence to relevant standards and regulations a random sampling of 5% of contractors and vendors associated with the Division of Health and Human Services will be distributed a brief compliance knowledge questionnaire annually;
  25. The Compliance Office will perform audits on compliance education processes and procedures by disseminating evaluations including but not limited to pre/post assessments and post-training surveys to determine if education and training have been communicated and implemented effectively;
  26. All data collected can be analyzed for gaps in understanding and training effectiveness;
  27. Affected individuals who are found to violate any policies and procedures, or Federal, State, and/or local laws will be assigned and required to undertake additional education and training as related to the violation. Training will be recommended by the Corporate Compliance Officer in collaboration with the Human Resources Commissioner.



**Sullivan County  
Corporate Compliance Program**

<b>Policy/Procedure Number</b>	<b>Resolution Number</b>	<b>Revision Date</b>
COMP 1.3	N/A	June 2024 (Effective)

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**VI. Document History**