

<b>Policy/Procedures</b>	<b>POLICY NO:</b>	UOP ACO-COMP-008
<b>COMPLIANCE TRAINING</b>	<b>SECTION/OWNER:</b>	CCO
	<b>EFFECTIVE DATE:</b>	01/01/2017
	<b>DATE TO QIC:</b>	01/15/2017
	<b>DATE TO BOARD:</b>	01/31/2017

**1.0 PURPOSE**

UOP ACO recognizes that for the Compliance Program to be effective the workforce of UOP ACO must receive education and training to as to the importance of compliance with applicable law, ethics, policies and procedures. To this end, UOP ACO mandates that all employees and contractors receive annual compliance training.

**ACRONYMS**

<b>ACRONYM</b>	<b>DESCRIPTION</b>
UOP	United Outstanding Physicians
ACO	Accountable Care Organization
CCO	Chief Compliance Officer

**DEFINITIONS**

<b>TERM</b>	<b>DEFINITION</b>
ACO	A healthcare organization that ties payments to quality metrics and the cost of care. ACOs in the USA are formed from a group of coordinated health care providers.
Workforce	Workforce is defined as employees, volunteers, contractors, and other person whose conduct, in performance of work for UOP ACO, is under the direct control of UOP ACO, whether or not they are paid by UOP ACO.

**2.0 ACCOUNTABLE**

Chief Compliance Officer, Chief Executive Officer, Executive Director, Chief Operating Officer, Chairman of the Board, Board Members.

### **3.0 POLICY**

Upon hire and then annually the UOP ACO workforce will be required to attend an education program regarding UOP ACO's compliance plan. The compliance training program shall be conducted by the Compliance Officer and/or a designee of the Compliance Officer who has sufficient knowledge and training to conduct the program.

This compliance education and training program shall include, but not be limited to, the following topics:

- i. UOP ACO's compliance philosophy and general commitment to compliance
- ii. General compliance policies and standards applicable to the UOP ACO workforce
- iii. The employee's obligation to adhere to all applicable laws, regulations and standards of conduct
- iv. The employee's obligation to report any suspected illegal or improper conduct and the procedures for making such reports
- v. Identification of the Compliance Officer and his or her authority and responsibility and identification of other responsible for overseeing compliance
- vi. Procedures for reporting compliance violations, including the use of the compliance hotline or other available reporting mechanisms
- vii. The consequences for violations and the disciplinary system
- viii. Employees shall be told that they can obtain additional compliance information from the compliance officer. Any questions that the employee's immediate supervisor or the compliance officer cannot answer shall be referred to the Compliance Committee and/or legal counsel, as applicable.

### **4.0 PROCEDURE**

- i. The Compliance Officer shall be responsible for overseeing the training and education of the UOP ACO workforce and agents with respect to compliance issues.
- ii. Specific training and education shall be conducted annually and more frequently if necessary. Circumstances which may warrant more frequent training and education include changes in applicable laws or regulations, identification of specific risk areas, issuance of new government directives or discovery of areas of noncompliance
- iii. The Compliance Officer, in consultation with the Compliance Committee and/or members of senior management, shall identify those subcontractors and other agents of UOP ACO who are required to adhere to specific compliance standards or perform duties on behalf of UOP ACO which require specific compliance training. These individuals shall receive education and training regarding UOP ACO's compliance standards and the

specific compliance standards applicable to the duties performed.

The following requirements shall apply to all training and education conducted pursuant to this policy:

- i. The person(s) responsible for conducting a training and education program shall document the attendance at the program, as well as the topics covered. Any written materials provided at the program shall be retained and attached to the attendance list. A copy of the attendance list and training materials shall be provided to the Compliance Officer.
- ii. The training and education may take place using publications, through lectures, videos, and other interactive activities designed to effectively communicate the information to the UOP ACO workforce. Training materials shall be designed to be understandable by all levels of employees who receive the materials.
- iii. All training and education programs shall include a component to verify that persons receiving the training and education understand the materials provided.
- iv. All training materials shall be reviewed and updated as necessary at least annually by the Compliance Officer or appropriate designee
- v. The training and education required by this policy is a condition of employment or contractual relationship with UOP ACO. No UOP ACO Workforce member shall perform functions which require adherence to compliance standards without receiving the required training, unless written permission is obtained from the Compliance Officer.

**REFERENCES**

CMS: [https://www.cms.gov/Medicare/Medicare-Fee-for-Service-Payment/sharedsavingsprogram/Quality\\_Measures\\_Standards.html](https://www.cms.gov/Medicare/Medicare-Fee-for-Service-Payment/sharedsavingsprogram/Quality_Measures_Standards.html)

**DOCUMENT HISTORY (examples)**

DATE	DESCRIPTION OF CHANGE	Accountable
01/01/2017	Original document	AC Director of Clinical Outcomes & Improvement

