

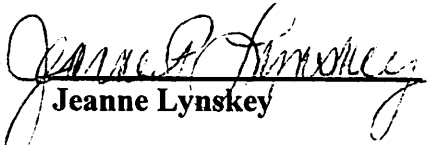
TRI-COUNTY MEDICAL ASSOCIATES, INC.

Effective Date: March 2017
Distribution: All Departments

Manual: Corporate Compliance

Originating Dept. Committee: Corporate Compliance

Corporate Compliance
Officer / Interim

Signature: 
 Jeanne Lynskey

Senior Management: Corporate Compliance
Liaison Officer

Signature: 
 Zofia Bibeault

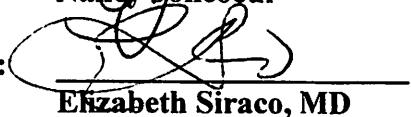
President

Signature: 
 Philip Ciaramicoli

Senior Administrator

Signature: 
 Nancy Jolicoeur

Medical Director

Signature: 
 Elizabeth Siraco, MD

 X **New**
Supersedes: Education and Training
 (Policy Name)

9/06/2013
 (Effective
Date)

3/01/2006
 (Origination
Date)

Subject: Education and Training Policy

Purpose: To ensure that Tri-County Medical Associates, Inc. ("TCMA") provides the necessary training and information to TCMA employees about its Corporate Compliance Program, including but not limited to, compliance policies and procedures, federal, state and private health care program requirements and applicable laws, so as to enable TCMA employees to operate in conformity with such rules and requirements.

Policy: TCMA shall develop and implement a compliance training program for TCMA employees, which training shall include instruction on applicable federal, state and private health care program requirements, the Corporate Compliance Program and substantive laws applicable to the business of TCMA.

Procedure:

1. TCMA shall conduct general compliance training for TCMA employees during their initial training period. Such training shall contain, at a minimum, information on applicable federal, state and private health care program requirements, the Code of Business Conduct, the Corporate Compliance Program and applicable laws, including laws pertaining to fraud and abuse, self-referral prohibitions and false claims liability.

2. Focused compliance training shall also be developed and implemented, as necessary, for TCMA employees working in specific risk areas identified in applicable Office of Inspector General (“OIG”) Compliance Program Guidance, including but not limited to, coding, claims development and submission, relationships with referral sources, physician practice operations and sales and marketing practices. Staff from various functional departments within TCMA shall assist in the development, tailoring and implementation of such training to TCMA employees. TCMA shall conduct such training through, among other things, in person workshops and/or self-study training modules.
3. New individuals employed by TCMA shall receive general compliance training, to the extent feasible, within ninety (90) days of commencement of employment at TCMA.
4. TCMA shall also ensure compliance with professional education course requirements mandated by state law and licensing boards with regard to applicable TCMA employees.
5. Attendance and participation in the compliance training set forth in this policy shall be a condition of continued employment with TCMA and shall be a factor in performance evaluations for TCMA employees. Failure to comply with the requirements of this policy may result in disciplinary action.
6. The Corporate Compliance Officer shall retain adequate records of TCMA’s compliance training and education of TCMA employees, including attendance sheets and educational materials distributed at training workshops and/or through training modules.
7. The Corporate Compliance Officer, with the assistance, as necessary, of TCMA staff and such other individuals trained in laws and regulations applicable to TCMA shall be responsible for developing and implementing TCMA’s compliance education program consistent with this policy.
8. The Corporate Compliance Officer shall also ensure that its compliance education materials are reviewed regularly, but no less than annually, to reflect changes in applicable laws and the Corporate Compliance Program.
9. The Corporate Compliance Officer shall report on compliance education activities to the Executive and TCMA Compliance Committees at their regular meetings.

REFERENCES:

Code of Business Conduct.

Office of Inspector General’s Compliance Program Guidance for Hospitals,
February 23, 1998, 63 Fed. Reg. 8987 at pp.8994-8995.