

	Origination	8/18/2020	Owner	Shané Abercrombia: Director of Compliance
	Last Approved	5/10/2023	Area	Compliance
	Effective	5/10/2023	Applicability	VillageCare Corporate Services
	Last Revised	5/10/2023	References	18 NYCRR § 521-1.2, 18 NYCRR § 521-1.4(d)
	Next Review	5/9/2024		

Compliance and Privacy Education and Training

PURPOSE

To establish VillageCare (VC) requirements for implementation of regular, effective compliance (including HIPAA privacy) training and education and to establish it is an integral part of the corporate compliance program.

DEFINITION

“AFFECTED INDIVIDUALS” includes all persons who are affected by VillageCare’s risk areas, including employees, appointees, the chief executive and other senior administrators, managers, contractors, agents, subcontractors, independent contractors, interns, students, vendors, volunteers, and governing body and corporate officers.

POLICY

1. The Chief Compliance Officer is responsible for developing the compliance education curriculum and for monitoring that training and compliance orientation meet the federal and state requirements for compliance programs and industry standards on the subject matter.
2. All Affected Individuals should receive an introduction to the compliance program including at a minimum:

- A. Code of Conduct
 - B. Elements of Mandatory Compliance Program
 - C. Organizational expectations for reporting compliance concerns
 - D. Summary of Fraud, Waste, and Abuse Prevention Plan, Policies and Procedures
 - E. Non-retaliation/non-intimidation and whistle-blower protection
 - F. HIPAA Privacy
3. All employees must receive compliance training during new hire orientation and on an annual basis thereafter.
 4. All Affected Individuals are required to complete some form of compliance training orientation and periodic annual compliance training according to their job category, duties, responsibilities, and affiliation with VC.
 5. Periodic and annual compliance training may be delivered in the form of electronic on-line content, handouts, self-study material, or in-person classroom setting.
 6. The Chief Compliance Officer is responsible with management to ensure that specialized compliance education is provided in identified risk areas.
 7. The Chief Compliance Officer will submit periodic reports on the status of compliance training to the Corporate Compliance Committee and the Audit Committee of the Board of Directors.

Approval Signatures

Step Description	Approver	Date
Final Approval	Emma Devito: President & CEO	5/10/2023
Compliance Officer	Dara Quinn: Chief Compliance Officer	5/9/2023
	Shané Abercrombia: Director of Compliance	4/25/2023