



Subject:	Compliance Training and Education
Endorsed By:	Compliance Committee
Approved By:	Compliance Committee, Board of Managers
DSRIP Implementation Deadline:	April 2015
Effective Date:	October 2015
Supersedes:	April 2015
Purpose:	It is the policy of SI-PPS, as part of its commitment to compliance with legal requirements, to ensure the training and education of all SI-PPS employees, independent contractors, agents, executives, and Board of Managers on compliance issues, expectations, and the compliance program operation.
Policy:	SI-PPS shall ensure that all SI-PPS employees, independent contractors, agents, executives, and Board of Managers receive annual and periodic training and that such training is a part of the orientation for all new PPS Associates. In addition, SI-PPS will require Participating Providers (“PP”) to provide DSRIP Compliance Education (provided by SI-PPS) to their affected employees on a periodic basis.
Procedure:	<ol style="list-style-type: none">1. All PPS Associates will be educated and trained as to the scope and requirements of the SI-PPS Compliance Program2. All PPS Associates shall review the SI-PPS Code of Conduct and shall be required to sign and date a statement that reflects his or her knowledge of, and commitment to, the SI-PPS Code of Conduct, upon beginning employment.3. All PP “affected employees” will be provided with a copy of the SI-PPS Code of Conduct and a description of the SI-PPS Compliance Program on a periodic

basis. The PP employees will be required to sign and date a statement that reflects his or her knowledge of and commitment to the Code of Conduct. The documentation will be maintained by the PP.

4. Upon hiring or engagement, all new PPS Associates will be educated and trained as to the scope and requirements of the Compliance Program. All new PPS Associates shall be required to sign and date a statement that reflects his or her knowledge of, and commitment to, the Code of Conduct.

4. All training activities will be documented and may be conducted through in-service training sessions or provided by outside resources.

5. Failure to comply with training requirements will result in disciplinary action up to and including suspension, termination, or exclusion from SI-PPS and the DSRIP program.

6. In addition to annual, periodic training and in-service programs, the SI-PPS Compliance Officer will disseminate any relevant new compliance information to all SI-PPS employees, independent contractors, agents, executives, and Board of Managers. Such information may include, but is not limited to, fraud alerts, advisory opinions, newsletters and bulletins.

7. All PPS Associates are required as a condition of employment and continued relationship with SI-PPS, to attend periodic compliance training.

8. As part of its continued commitment to compliance with legal requirements, SI-PPS will implement mandatory annual and periodic Compliance Program training. Training topics may include, but are not limited to:

- The Code of Conduct;
- Compliance Program;
- SI-PPS' policies and procedures;
- Record maintenance and reporting;
- Compliance reporting requirements;
- Privacy and security of confidential information and data;
- SI-PPS' commitment to compliance with all legal requirements and policies;

	<ul style="list-style-type: none"> • Prohibitions on paying or receiving remuneration to induce referrals; • Improper alterations to clinical or financial records; • Duty to report misconduct; • Non-intimidation and non-retaliation policies and • Fraud and Abuse statutes and regulations. <p>9. The SI-PPS Compliance Officer will be responsible for facilitating any additional and/or remedial education and training that is required as part of the Compliance Program. Additional educational and training programs will be developed for specific individuals or groups based upon job functions or identified compliance issues and risk areas.</p>
Scope:	<p>SI-PPS Associates (PPS Associates shall mean all individuals and entities that participate in or do business with SI-PPS, including but not limited to its employees, independent contractors, vendors, agents, suppliers, executives and governing body members).</p> <p>SI-PPS Participating Providers shall mean health care providers organizations, community-based social service organizations, and other organizations that have partnered with SI-PPS and serve Medicaid beneficiaries and uninsured individuals on Staten Island.</p>
Project(s):	
Regulatory Alignment:	New York Social Services Law §363-d subd. 2 and 18 NYCRR §521.3(c),
Reference(s):	
Attachment(s):	none

Reviewed/Revised by Regina Bergren April 2016

Approved by Compliance Committee- August 2016

Partner Organization	Responsible Staff Name & Title	Date Reviewed	Signature

