Department: COMPLIANCE	Version #: 12
Title: Compliance, Fraud Waste Abuse (FWA), and HIPAA Mandatory Training	Date Created: 1/1/2014 Last reviewed 4/15/2024
Process Owner: Compliance Officer	
Document Type: Policy	Approvers: Policy Review Committee
References: Chapter 21 of the Medicare Managed Care Manual, Section 50.3; 42 CFR 422.503(b)(4)(vi)(C); 42 CFR 423.504(b)(4)(vi)(C); 45 CFR 164.530	Date Approved: 5/23/2023

Printed copies are for reference only. Please refer to the S/Policies_and_Work_Instructions for the most recent version.

Purpose: To ensure ATRIO's compliance with the training requirements outlined in the guidance cited above.

Scope: Applies to the Board of Directors and all ATRIO Employees who have (or will have) access to ATRIO's email system, data, PHI, and/or other systems where member data or company information may be accessed.

Definitions:

Employee – any full-time employees, part-time employees, temporary employees and volunteers employed by ATRIO or Atrio Holding Company, and independent contractors.

HIPAA – Health Insurance Portability and Accountability Act, a 1996 Federal law that restricts access to individuals' private medical information.

HITECH – Health Information Technology for Economic and Clinical Health Act, a 2009 federal law that imposes data breach notification requirements for unauthorized use/disclosure of unsecured protected health information, provides individuals with a right to obtain their protected health information in an electronic format, and applies certain HIPAA provisions directly to business associates.

Policy:

Employees

ATRIO requires all Employees to complete ATRIO's HIPAA/HITECH Privacy and Security Training, General Compliance Training, and Fraud, Waste and Abuse Training within 90 days from their date of hire and annually thereafter.

The ATRIO Compliance Officer or their designee will maintain documentation of the completion of the training.

Employees who fail complete all required compliance courses by the established deadline will be reported to their manager by Compliance.

Failure to complete the trainings 30+ days beyond the initial deadline will be tracked by Compliance, escalated to the CEO, and the employee will be added to the non-compliant list, which may impact their overall performance review and ability to earn raises, bonuses, promotions.

Prior to the start of ATRIO's annual employee performance evaluation process, Compliance will send applicable manager(s) a list of their employees who have failed to comply with the training requirements, so that the manager can factor in the non-compliance when assessing employee performance, rating score, and recommendations for raises, promotions, etc.

Board of Directors
ATRIO requires the Board of Directors to complete ATRIO's General Compliance Training and Fraud, Waste and Abuse Training within 90 days from their date of appointment, and annually thereafter.

The ATRIO Compliance Officer or their designee will maintain documentation of the completion of the training.

The ATRIO Compliance Officer or their designee will promptly escalate the matter to the ATRIO President/CEO if any member of the Board of Directors fails to timely complete the required training.

Oversight:
The Compliance Officer or their designee will monitor Employee and Board of Directors' compliance with this policy. The Compliance Officer or their designee may audit Employee and Board of Directors compliance with this policy at any time.

Training record retention:
Training records must be maintained for a period of 10 years, plus the current year.

Procedure: This policy is carried out by utilizing the following tools:
- Designated Compliance department employee who manages, tracks, monitors, and saves evidence of all required training activities outlined in this policy.
- Online Learning Management System (LMS) which facilitates the required trainings via web-based presentation, and which records, tracks, and saves user activities and completion dates.

- Excel Spreadsheet used as a tracker, in which a Compliance employee records all new Employees and Board Members along with their initial training deadlines and completion dates. This information is monitored and reported on the Compliance Dashboard monthly.
- Annual distribution of the required training courses above is monitored and evidence of such is retained on ATRIO's Shared Drive, as well as within the LMS.

Resources:
WI_Check Transcript Status in Elearning
WI_Set up New ATRIO Users in Elearning
Compliance Program Disciplinary Standards