PROCEDURE STATEMENT:
To establish processes to implement Health Quest’s CTE policy and ensure appropriate and required education is provided.

PROCEDURE:
A. New Workforce Member and Annual Workforce Member Training

1. Workforce Members who are new employees are required to complete CTE at New Employee Orientation (“NEO”) which will cover the same topics as noted below. Additionally, each department manager is responsible to ensure that all new Workforce Members receive CTE necessary to perform their specific duties in compliance with applicable laws, regulations, and company policies and procedures.

2. Workforce Members who are employees are required to complete CTE annually. Annual CTE will include the following topics:
   - General Compliance and the elements of HQ’s Corporate Compliance Program (“Compliance Program”)
   - Privacy and Confidentiality (HIPAA)
   - Code of Conduct
   - Each employee’s responsibility to:
     o Comply with HQ’s Compliance Program Requirements and applicable Federal health care program requirements
     o Promote a culture of compliance and participate in the Compliance Program
     o Report compliance issues consistent with HQ “Compliance Disclosure Program” policy and procedure (HQ 5.1.25)
   - Various Compliance Program policies/procedures and topics, to include
     o “Compliance with Anti-Kickback Statute and Stark Law” (HQ 5.1.26)
     o False Claims Act
     o “Identifying, Tracking and Processing Overpayments” (HQ 5.1.19)
     o “Non-Retaliation, Non-Retribution, Non-Intimidation for Good Faith Reporting” (HQ 5.1.11)
   - HQ’s Corporate Integrity Agreement Obligations
3. CTE topics and materials will be developed by the Chief Compliance Officer (“CCO”) and the Office of Compliance, Internal Audit and Privacy (“OCIAP”) and through external resources as necessary. The annual CTE materials will be updated annually to reflect changes in regulations or policies. General Counsel may be consulted regarding new laws and regulations to help ensure training materials are revised as appropriate.

4. CTE is completed through the Human Resources (“HR”) computer-based training (“CBT”) platform. Additional methods of disseminating training (in-person, paper-based training, etc.) will be considered to ensure the most effective method is utilized. A post-test is required to verify Workforce Member understanding. Reasonable accommodations (e.g., printed versions) are provided to individuals unable to access computer-based training.

5. CTE encourages Workforce Members to ask questions and provide feedback if they require additional information, have suggestions for additional training topics, or if they want to report a potential compliance concern.

6. As issues arise and circumstances warrant, targeted CTE shall be required of affected Workforce Members.

7. HR maintains the CBT platform and individual employee records of completed CTE. Reviews of the CBT are conducted by HR to verify all workforce members have completed training.

8. Records of CTE must be maintained.

B. Vendor Training

1. Annual Vendor CTE will include the following topics:
   - Alignment of vendor operations with, and their role in, HQ’s Compliance Program
   - Review of how to recognize acceptable behavior and appropriate decision-making that demonstrates commitment to compliance, ethics and integrity
   - Vendor responsibility to promote a culture of compliance
   - Various Compliance Program policies and procedures, to include:
     - “Gifts and Business Courtesies from Vendors Guidelines Policy” (HQ 5.1.07)
     - “Conflict of Interest Policy” (HQ 5.1.03)
2. Vendor Compliance Training and verification of completion is provided through the Procurement Database/Software.

C. Corporate Integrity Agreement (“CIA”) Training and Education

1. All Covered Persons (as defined in the CIA) will receive at least annual training regarding HQ’s CIA requirements, the Compliance Program, and applicable Federal health care program requirements, including over-payments, the requirements of the anti-Kickback Statute and the Stark Law, and consistent with the written Training Plan.

2. Education will be provided to all Covered Persons during each Reporting Period of the CIA.

D. Management Certification Training

1. Management Certification Training will be provided to all certifying and sub-certifying employees as defined in the “Management Certification Policy” (HQ 5.1.24)

2. Annual Management Certification will include the following topics:
   - Expectations regarding reporting and certification that their applicable department is in compliance with applicable Federal health care program requirements and the obligations of the CIA.
   - The certification and sub-certification process

E. Board of Trustees (Board) Member Training

1. Annually, each member of the Board will complete at minimum one (1) hour of training that addresses their corporate governance responsibilities and their specific responsibilities with respect to, and oversight of, the Compliance Program.

2. Training will address the unique responsibilities of health care boards including risks, oversight areas, and strategic approaches to conducting oversight of a health care entity.

3. Training will also provide a review of HQ’s Corporate Compliance Program, including the Code of Conduct and the requirements of the CIA.

4. Training may be conducted by an external compliance expert hired by the Board and will include a discussion of the OIG’s guidance on Board member responsibilities.
5. New Board members will receive Board Member Training within 30 days of becoming a member.

F. CTE Reporting and Oversight

The CCO will submit periodic reports to the Executive Compliance Committee and the Compliance and Audit Committee of the Board on the status of Annual CTE and the progress of the various CTE initiatives.

POLICY HISTORY:
Supersedes: 1/19/2017
Original Implementation Date: 1/19/2017
Date Reviewed: 10/26/2018
Date Revised: 10/26/2018

APPROVAL:

[Signature]
10/26/2018

Procedure Owner
Date