


<b>DCO OPERATIONS</b>	 From DentaQuest		
	<i>Policy and Procedure</i>		
	Policy Name:	<b>Training and Education</b>	Policy ID: <b>PLANCG-78</b>
	Approved By:	Advantage Dental Services, LLC Compliance Committee	Last Revision Date: 10/05/2021
	States:	Oregon	Last Review Date: 11/30/2021
Application:	Medicaid	Effective Date: 12/01/2021	

## PURPOSE

This policy sets forth the facilitation of General Compliance Training, Fraud, Waste and Abuse (FWA) Training, Code of Conduct Training, HIPAA Privacy Information Security Training, Cultural Competency Training, and Non-Discrimination Training (“Compliance-related Trainings”) upon initial hire/contracting (within 30 days) and annually thereafter.

## POLICY

The Dental Care Organization (DCO) will comply with all applicable federal and state laws, and regulations regarding the establishment of an effective compliance program plan. Specifically, the DCO will establish, implement, and provide effective Compliance-related Trainings to all DCO Personnel. DCO training modules are reviewed and updated at least annually, and more often if needed to reflect changes to related laws, regulations, policy, or guidance. The DCO will make off-cycle updates to address significant changes to laws, regulations, policy, or guidance, as needed. The procedure outlined in this policy may be modified by the DCO based upon unique circumstances of specific client/plan contracts.

## FWA AND GENERAL COMPLIANCE TRAINING CONTENT

General Compliance and FWA trainings may include unmodified content from the Center of Medicare and Medicaid Services (CMS) Medicare Learning Network (MLN) and organization-specific information. General Compliance and FWA training evidence will be retained for a period of at least 10 years to support initial training (within 30 days of hiring/contracting) and annual training on FWA topics occurred for all employees who work directly on Medicare Advantage related business.

It is the policy of the DCO to ensure that all of its Personnel understand the Federal False Claims Act (FCA), State FCAs and DCO’s Fraud and Abuse compliance plan with regard to prevention, detection and reporting of suspected fraud, waste, and abuse activities. FWA Training is required to be completed by all DCO Personnel at all locations.

## REFERENCES

CMS Managed Care Manual Chapter 21  
 CMS Prescription Drug Benefit Manual Chapter 9  
 42 C.F.R. §§ 422.503 (b)(4)(vi)(C), 423.504 (b)(4)(vi)(C)

## DEFINITIONS

- **“DCO Personnel” or “Personnel”** means officers, employees, independent contractors, Board members and subcontractors (downstream entities).

## **PROCEDURE**

### **I. Catalyst Board of Directors**

- A. Catalyst is the parent of DentaQuest, LLC and its subsidiaries, including the DCO. The Board of Directors will receive annual General Compliance training presented by the Chief Compliance Officer. Upon completion, the Executive Vice President, Chief Legal Counsel, records the training activity in the meeting minutes, which may include: confirmation of Code of Conduct awareness, compliance responsibility, completion of the trainings, agreement to comply with the standards, and disclosure of any conflicts of interest.

### **II. DCO Employees**

- A. All Compliance-related Trainings included in new hire orientation. All new employees will receive and complete their initial training through DCO's Learning Management System (DLMS) within their first 30 days of employment. Additionally, new employees placed in roles that have access and/or exposure to protected health information must complete the HIPAA Privacy Information Security Training prior to beginning their job duties.
- B. The DCO shall conduct annual training through DLMS for all DCO employees to ensure compliance with applicable laws, regulations, professional standards, ethical standards, and company policies. The training program will focus on our business practices, the employees' role in compliance, and reporting of violations.
- C. Completion of training is tracked and monitored by the Human Resource Department. Disciplinary actions are taken, as needed, to enforce completion of required training.
- D. Training records are maintained for a period of no less than ten (10) years and will include time, attendance, completion logs listing current employee listing showing hire/contracting dates, certificates of completion, and test scores of any tests administered.

### **III. Employees of FDRs**

- A. The DCO shall provide copies of the FWA, General Compliance and other Compliance-related training to its applicable first-tier, downstream and related entities ("FDRs") to ensure compliance with applicable laws, regulations, professional standards, ethical standards, and company policies. FDRs are required to complete training and a training attestation within 30 days of contracting and at least annually thereafter and submit the executed training attestation back to the DCO for review and approval.
- B. The DCO provides notices to FDRs of the CMS training requirements (which include FWA and General Compliance training) and its company training requirements through various mechanisms such as newsletters, fax blasts, website/web portal postings, etc. In addition, the DCO communicates general compliance information through the Code of Conduct and Compliance Policies and Procedures dissemination to FDRs within 30 days of contracting, with updates as necessary, and annually thereafter.
- C. FDRs are required to retain evidence of training completion (e.g., training logs, employee certifications, etc.) for a period of no less than ten (10) years, and to make this evidence available to the DCO and/or CMS upon request (i.e., FDR audits, etc.).
- D. Internally, completion of training by FDRs is tracked and monitored by the Provider Engagement Department with copies being shared with the Compliance Department.

### **IV. Employees of Subcontractors**

- A. The DCO shall provide copies of the FWA, General Compliance and other applicable Compliance-related training to its applicable subcontractors to ensure compliance with applicable laws, regulations, professional standards, ethical standards, and company policies. Subcontractors are required to complete training and a training attestation within 30 days of

- contracting and at least annually thereafter and submit the executed training attestation back to the DCO for review and approval.
- B. The DCO provides notices to subcontractors of the CMS training requirements (which include FWA and General Compliance training) and its company training requirements through various mechanisms such as e-mail communications, Logic Manager System outreach, etc. In addition, the DCO communicates general compliance information through the Code of Conduct and Compliance Policies and Procedures dissemination to subcontractors within 30 days of contracting, with updates as necessary, and annually thereafter.
  - C. Subcontractors are required to retain evidence of training completion (e.g., training logs, employee certifications, etc.) for a period of no less than ten (10) years, and to make this evidence available to the DCO and/or CMS upon request (i.e., Subcontractor audits, etc.).
  - D. Internally, completion of training by FDRs is tracked and monitored by the Vendor Management team, with copies being shared with the Compliance Department.

**V. Discipline**

Failure to complete training within the required timeline may subject an employee, Board member or entity to disciplinary action, up to and including termination.

***Revision History***

Date:	Description
1/30/2014	Updates based on annual review
3/27/2014	Updates based on annual review.
2/20/2015	Updates driven by the recommendations from the 2014 Compliance Program Assessment.
11/2/2015	Further updates driven by the recommendations from the 2014 Compliance Program Assessment.
1/13/2016	Updated new hire training completion timeframe to reflect federal regulation “90-day requirement”
4/26/2017	Updates based on annual review. Retired policy 1200.014 Fraud, Waste and Abuse Training – Incorporated relevant content.
2/27/2018	Conversion to revised policy and procedure format and naming convention.
5/11/2018	Updated new hire training completion timeframe to read “30-day training requirement”
10/31/2018	Updated language in Board of Directors training section.
11/12/2018	Corporate Compliance Committee approval
11/10/2020	DCO Compliance Committee approval
06/09/2021	Updates based on annual review.
10/05/2021	Updates based on annual review.