



DEPARTMENT: Compliance	POLICY DESCRIPTION: Corporate Integrity Agreement Training
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REVISION DATES:	EFFECTIVE DATE: March 13, 2020

SCOPE

This policy is applicable to all company affiliated Centers and employees.

PURPOSE

To describe the requirements for training on the Company’s Compliance Program and Corporate Integrity Agreement (“CIA”) with the Office of the Inspector General of the Department of Health and Human Services.

POLICY

It is the policy of the Company that all Covered Persons will complete General Compliance Training and CIA Covered Persons training within 90 days of hire and annually thereafter.

DEFINITIONS

Covered Persons – Includes: (1) all owners, officers, directors, and employees of Diversicare; (2) all contractors, subcontractors, agents, and other persons who furnish patient care items or services or who perform billing or coding functions on behalf of Diversicare, excluding vendors whose sole connection with Diversicare is selling or otherwise providing medical supplies or equipment to Diversicare; and (3) all physicians and other non-physician practitioners who are members of Diversicare’s active medical staff.

General Compliance Training – This training includes topics such as compliance standards, the compliance program, Federal health care program requirements, fraud, waste, and abuse, the Anti-kickback Statute, the Stark law, confidential reporting, and non-retaliation.

Effective Date – The date on which the final signatory of the CIA executes the CIA.

Reporting Period – Each of five one year periods, beginning with the Effective Date.

PROCEDURE

1. Within 90 days of the Effective Date, the Corporate Compliance Department will prepare a written training plan to ensure compliance with the training requirements of the CIA. The training plan will include information regarding the following: training topics, categories of Covered Persons required to attend each training session, length of the training session(s), schedule or training, and format of the training.
2. Within 90 days of hire and for each Reporting Period thereafter, all Covered Persons will be required to complete training regarding Diversicare’s CIA requirements and Compliance Program and applicable federal health care program requirements, including the requirements of the Anti-Kickback Statute and the Stark Law.



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3. The Corporate Compliance Department will work with supervisory employees in all areas of the Company to ensure Covered Persons complete the training within the applicable timeframes.
4. Documentation, either electronic or paper, of the completion of the appropriate training must be maintained for six years after the end of the final Reporting Period, or longer if otherwise required by law.

REFERENCES

Corporate Integrity Agreement