

HERITAGE FARM POLICY AND PROCEDURES

Policy: Employee, Board, and Independent Contractor Compliance Training

Date: October 8, 2013

Rationale:

- The development and implementation of regular, effective education and training is an integral part of the compliance program.
- Compliance education is divided into two general components.
 - First, all employees, Board members, and independent contractors must receive an introduction to the compliance program.
 - Second, those parties whose work is linked to identify risk areas should receive specialized compliance education pertaining to their function and responsibilities.

Policy:

- All employees, Board members, and independent contractors will receive training related to the organization's overall compliance program. Independent contractors who do not provide direct services will have language regarding the corporate compliance policy within their contracts.
- Employees in identified risk areas will receive more detailed education related to their function and responsibilities. Independent contractors will have language regarding the corporate compliance policy within their contracts.
- Attendance at training sessions or completion of online training is mandatory and is a condition of continued employment or contracting.

Procedures:

- The Compliance Officer is responsible for developing the compliance education curriculum and monitoring and ensuring that compliance training and orientation meet the policy standards on this subject.
- Compliance education seminars must include an explanation of the structure and operation of the compliance program. They will introduce the Compliance Officer to the organization.

- Compliance education seminars, at a minimum, will include information on the following aspects of the compliance program:
 - Code of Conduct and other related written guidance;
 - False Claims Act;
 - Whistleblower Provisions;
 - New York False Claims Act;

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- Communication channels (name of Compliance Officer, reporting mechanisms, Hotline);
- Organizational expectations for reporting problems and concerns; and
- Non-retaliation policy.

- Specialized areas for education will include, but not be limited to the following:
 - Improper or fraudulent billing for services;
 - Preparation of inaccurate or incorrect cost reports;
 - Misuse of Heritage Farm funds;
 - Payment or receipt of remuneration or gifts in return for client referrals;
 - Government and private payor reimbursement principles; and
 - Government initiatives related to the services provided by the Heritage Farm.
- Comprehensive education materials will be developed to facilitate the compliance sessions and ensure that a consistent message is delivered to all employees, Board members, and independent contractors. Education protocols and materials must be standardized, so as to evidence that everyone attending a seminar receives the same instruction. All materials (training, plan, policies, forms, and video) will be hosted electronically.
- As part of his or her initial orientation, each employee, Class A independent contractor, and Board member shall receive a training session, whether in person or online, within the first thirty (30) days of employment or contracting. Each employee, Class A independent contractor, and Board member will receive, either hardcopy or online, an introduction to Heritage Farm's compliance program and objectives, the Code of Conduct, compliance plan, and compliance policies. Each new employee, Class A independent contractor, and

Board member will sign an acknowledgement form (attached to this Policy) that they are aware of and will abide by the Compliance Program and Code of Conduct. Class B independent contractors will have language regarding the corporate compliance policy within their contracts.

- All existing employees will receive a training session, either in person or online, at least once per year that includes a review of the existing Compliance Program, the Code of Conduct, and any applicable policies and procedures. The session will also focus on any changes in Federal or State laws and regulations.
- Verification of education and training relating to the Compliance Program, whether in person or online, will be tracked, recording the date, start and end time of the session, and the content of the material presented. The Compliance Officer will maintain a file of attendance forms for all training sessions.
- Employees, independent contractors, and Board members will be provided with the opportunity to seek clarification or more information on any aspect of the compliance program. Trainers who are not able to answer specific questions will arrange for follow-up to be conducted by the Compliance Officer or member of senior management. In regards to electronic training, clarification on any aspects of the compliance program is to be referred to the Compliance Officer or a member of senior management.
- Only properly trained individuals approved by the Corporate Compliance Committee will be used to provide compliance education and training seminars. Compliance program trainers must be knowledgeable of the (a) compliance program; (b) applicable Federal laws and regulations; (c) requirements of the Federal Sentencing Guidelines; (d) relevant organization policies/procedures; (e) operations of the compliance program; and (f) content of the Code of Conduct.
- The Compliance Officer is responsible for coordinating with management to ensure that specialized compliance education occurs in identified risk areas.
- Managers shall assist the Compliance Officer in identifying areas that require specific training and are responsible for communication of terms of the compliance plan to all independent contractors doing business with the Heritage Farm.

- Heritage Farm will ensure that the Compliance Officer has sufficient opportunities to receive training on compliance issues.
- The Compliance Officer is also responsible for submitting periodic reports to the Compliance Committee and Board of Supervisors on all education seminars related to the compliance program.

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Acknowledgement Form - Compliance Training

Title of Training: _____

Date of Training: _____

Contents;

- **Heritage Farm's** Compliance Plan;
- Code of Conduct;
- Federal and State Regulatory Enforcement Agencies and Their Functions;
- Regulatory History
- False Claims Act
- NY False Claims Act
- Whistleblower Provisions and Non-retaliation Policy
- Expectations for Reporting Problems and Concerns
- Communication Channels (including name of Compliance Officer and methods to report)

_____; I acknowledge that I have attended Compliance training on this date. I have been provided with the opportunity to ask any questions that I may have.

_____; I acknowledge that I have received and read a copy of the Compliance Plan and the Code of Conduct.

_____; I understand that I must comply with the Compliance Plan, the Code of Conduct, all laws, regulations, policies and procedures, and guidance provided.

_____; I understand that I must report any instances of possible violations of the Compliance Plan, the Code of Conduct, laws, regulations, and policies and procedures to a member of management or the Compliance Officer.

_____; I understand that **Heritage Farm** maintains a hotline for confidential or anonymous reporting of possible violations of the Compliance Plan, the Code of Conduct, laws, regulations, and policies and procedures.

_____; I understand that my failure to comply with the Compliance Plan, the Code of Conduct, laws, regulations, and policies and procedures or to report possible violations may result in disciplinary action, up to and including termination.

Print Name _____ Title _____

Signature _____ Date _____

Heritage Farm

Compliance Training - Attendance

Date of Training: _____
Time of Training: Start: _____ End: _____
Location: _____
Instructor: _____

Contents

- **Heritage Farm's** Corporate Compliance Plan _____
- Code of Conduct _____
- Federal and State Regulatory Enforcement Agencies and Their Functions _____
- Regulatory History _____
- False Claims Act _____
- NY False Claims Act _____
- Whistleblower Provisions and Non-retaliation Policy _____
- Expectations for Reporting Problems and Concerns _____
- Communication Channels (including name of Compliance Officer and methods to report) _____
- Questions and Answers

Attendance

Note: Each employee must also sign an acknowledgement of attendance.

Print Name	Title	Signature
