 KMTSJ, Inc.	DEPARTMENT:	Compliance
	SUBJECT:	Compliance Training
	PRODUCT LINE:	All
	POLICY NUMBER:	CP02
	ORIGINAL POLICY EFFECTIVE DATE:	01/01/2003
	LAST REVISED DATE:	07/01/2023
	LAST REVIEWED DATE:	07/01/2023

SCOPE: To ensure Group Health Cooperative of Eau Claire (the Cooperative) and KMTSJ, Inc. (KMTSJ) are in compliance with State and Federal mandates and regulations as it pertains to training and education on compliance and ethics issues.

POLICY: It is the policy of the Cooperative and KMTSJ to ensure Cooperative and KMTSJ employees are educated and trained on compliance issues. This includes, but is not limited to, annual compliance training and/or specialized training as prompted by state/federal mandates and regulation changes.

PROCEDURE:


All employees and temporary employees with the Cooperative and KMTSJ are required to complete an annual compliance training session and other required specialized training sessions. The Executive Director of Compliance and Director of Compliance are responsible for conducting all compliance training. The training includes:

- Overview of Standards of Conduct;
- Compliance requirements of the Cooperative and KMTSJ including the compliance communication procedure;
- Confidentiality policy of the Cooperative and KMTSJ;
- Applicable State and Federal requirements affecting all employees and/or the Cooperative or KMTSJ operations;
- Annual Fraud, Waste and Abuse training requirements (see CP3)

Training sessions are mandatory and a required component of continued employment.

New employee training will be conducted periodically as employees are hired. This training will also be conducted with new board members that join the Cooperative’s governing body. This training consists of, at minimum:

- Compliance Committee and its purpose;
- Executive Director of Compliance and his/her responsibilities;
- Employee and contractor compliance responsibilities;
- Overview of Standards of Conduct;
- Compliance requirements of the Cooperative and KMTSJ, including the compliance communication procedure;
- Confidentiality policy of the Cooperative and KMTSJ;
- Applicable state and Federal requirements affecting all employees and/or the Cooperative or KMTSJ operations;
- Fraud, Waste and Abuse training requirements
 - Annual training will include the required CMS Medicare Part D Compliance and FWA training.

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Tracking of Training Information

The Compliance Department will track and maintain records of compliance training sessions conducted. Records will include the training materials discussed, attendance of employees and competency exams, if applicable. Beyond compliance specific trainings, and to ensure compliance with regulatory and contractual requirements, the Compliance Department will maintain a training tracking log of all departmental training activities, as well as participation by employees.

If any training materials are distributed electronically to employees of the Cooperative and KMTSJ, a digital acknowledgment will be used to record who read and acknowledged the materials disseminated.

Other Specialized Training

Other specialized training may be conducted by individual department managers or designee of the department manager or Compliance Department, particularly if/when a particular compliance concern is identified. Training may be at the department level or at the individual staff or position level.

Acknowledgement

All Cooperative and KMTSJ employees will attest to review of the Employee Code of Conduct and Confidentiality Statement annually. This attestation will be tracked by the Compliance Department.


Reference Source, if applicable: Federal Register / Vol. 64, No. 219 / Monday, November 15, 1999 / Notices

APPROVED: Terri Hernandez DATE: 07/01/2023

Formal policies and procedures require department manager review, approval and signature. Executive and/or administrative policies and procedures require CEO/General Manager review, approval and signature.

REVISION HISTORY:

Rev. Date	Revised By/Title	Summary of Revision
05/20/2010	Mark Peterson	
07/01/2011	Mark Peterson	
06/27/2012	Jennifer Rust Anderson, Compliance Officer	Reviewed as part of the 2012 Compliance & Risk Mgmt Plan.

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06/17/2013	Jennifer Rust Anderson, Compliance Officer	Updated template/branding; clarification on tracking of training.
07/27/2015	Jennifer Rust Anderson, Compliance Officer	Updated Compliance Manager to Compliance Officer
08/01/2016	Jennifer Rust Anderson, Compliance Officer	Updated provision re: Medicare Part D training
07/01/2019	Nick Christensen, Compliance Coordinator	Updated Compliance Officer to Compliance Manager
03/19/2020	Sarah McCracken, Compliance Manager	Added/clarified language for FWA training for First Tier/Downstream/Related Entities and governing body.
06/25/2020	Nick Christensen, Compliance Coordinator	No changes.
07/14/2022	Sarah McCracken, Ex. Dir. Of Compliance	Updated titles, added training tracking information.
07/01/2023	Terri Hernandez, Director of Compliance	Tracking of annual training is maintained by the Compliance department, removed reference to Human Resources. Removed first tier downstream language.