


COMPLIANCE			
	<i>Policy and Procedure</i>		
	Policy Name:	Training and Education	Policy ID: PLANCG-78
	Approved By:	Courtney Barnes Ransom, Head of Risk Management, Ethics and Compliance	Last Revision Date: 06/13/2025
	States:	Oregon	Last Review Date: 06/23/2025
	Application:	Medicaid	Effective Date: 06/23/2025

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, current URAC standards applicable to employees' job function, and Non-Discrimination Training ("Compliance-related Trainings") upon initial hire/contracting (within 30 days) and annually thereafter.

POLICY

Advantage Dental Services will comply with all applicable federal and state laws, and regulations regarding the establishment of an effective compliance program plan. Specifically, Advantage Dental Services will establish, implement, and provide effective Compliance-related Trainings to all Advantage Dental Services Personnel. Advantage Dental Services training modules are reviewed and updated at least annually, and more often if needed to reflect changes to related laws, regulations, policy, or guidance. Advantage Dental Services will make off-cycle updates to address significant changes to laws, regulations, policy, or guidance, as needed. Annual training updates may include as necessary and applicable: compliance program changes and new developments; Medicaid statutory, regulatory, and contractual requirements. The DCO has established the position of Head of Risk Management, Ethics & Compliance (Compliance Officer) who is responsible for overseeing, approving, and monitoring of the overall Compliance Program; including the compliance-related trainings and Code of Conduct. The Compliance Officer must also be responsible for the content distributed to employees and managers. The procedure outlined in this policy may be modified by Advantage Dental Services 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.

It is the policy of Advantage Dental Services to ensure that all of its Personnel understand the Federal False Claims Act (FCA), State FCAs and Advantage Dental Services'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 Advantage Dental Services 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)
- URAC Standard Core 27
- 42 C.F.R. § 438.608(a)(1)(iv)
HPMS Memorandum Reducing the Burden of the Compliance Program Training Requirements dated February 10, 2016

DEFINITIONS

“Advantage Dental Services Personnel” or “Personnel” means officers, employees, independent contractors, Board members and subcontractors (downstream entities).

PROCEDURE

I. Advantage Dental Services Employees

- A. All Compliance-related Trainings included in new hire orientation. All new employees will receive and complete their initial training through Advantage Dental Services’ Learning Management System (DLMS)/Learning Navigator 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. Advantage Dental Services shall conduct annual training through DLMS for all Advantage Dental Services employees to ensure compliance with applicable laws, regulations, professional standards, ethical standards, and company policies. All Advantage Dental Services Personnel, including the Chief Compliance Office and all other senior management are required to complete all Compliance related training and are not permitted to perform their own training and education. 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.

II. Employees of FDRs

- A. Advantage Dental Services 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 within 30 days of contracting and at least annually thereafter.
- B. Advantage Dental Services provides notices to FDRs of FWA and General Compliance training requirements and its company training requirements through various mechanisms such as newsletters, fax blasts, website/web portal postings, etc. In addition, Advantage Dental Services 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 Advantage Dental Services 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.

III. Employees of Subcontractors

- A. Advantage Dental Services 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 within 30 days of contracting and at least annually thereafter.
- B. Advantage Dental Services provides notices to subcontractors of FWA and General Compliance training requirements and its company training requirements through various mechanisms such as e-mail communications, Logic Manager System outreach, etc. In addition, Advantage Dental Services 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 Advantage Dental Services and/or CMS upon request (i.e., Subcontractor audits, etc.).
- D. Internally, completion of training by Subcontractors is tracked and monitored by the Vendor Management team, with copies being shared with the Compliance Department.

IV. Off-cycle Training Curriculum

- A. Department leaders may request the Human Resources Department develop specific trainings, workshops or coaching aimed at seeking to support the skills development efforts of their staff. Human Resources will be responsible for evaluating the request and determining the type of training, workshop, orientation, coaching, communication, or any other individual development initiative is needed. If the required training will be delivered by an external resource, costs will be charged to the requesting Department.
- B. Once the types of resources, speakers and location are determined, the Human Resources department will coordinate the delivery method, e.g., virtual classroom, conference call, online training module, in-person, among others.
- C. All specialized specific or targeted job-related and/or business area trainings are coordinated and/or designed by the Human Resources Department with the support of subject matter experts, such as Compliance or Legal. Some specialized trainings that are unique to a specific job or operational area are administered directly by the impacted Department.
- D. Completion of all training, including specialized training, is tracked, and monitored by the Human Resource Department. Disciplinary actions are taken, as needed, to enforce completion of required training. The Human Resources department is responsible for the distribution and verification of attendance records to ensure all impacted employees are trained as required. The frequency of this monitoring process may vary according to the DCO's needs and requirements.
- E. 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.

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.
12/31/2022	Updates based on annual review.
02/14/2024	Updates based on annual review.
06/13/2025	Updates based on annual review.