



Compliance Training and Education

Updates Approved by Compliance Committee: 6.7.2023; 9/9/26

Reviewed w/ No Changes: 9.4.2024; 9.3.2025

Revised: 8/19/26 (moved to Centralus)

Purpose:

Centralus Health System's Compliance Program (the "Compliance Program") promotes an organizational culture that encourages all directors, officers, employees, contracted personnel, medical staff members, volunteers, students, contractors and agents (together, hereinafter referred to as "affected individuals") to conduct its business in compliance with all applicable laws. CHS' Board of Directors is committed to the success of the Compliance Program. The Compliance Program provides education and training on compliance requirements and standards, offers guidance, promotes an organizational culture of compliance, and provides an environment in which affected individuals can act in good faith without fear of retaliation. The Compliance Training and Education Program is a critical component of the overall Compliance Program and provides affected individuals with an opportunity to learn to identify potential compliance issues, and understand how the Compliance Program operated and expectations for all affected individuals to play an active role in the Compliance Program.

Policy:

The Compliance Training and Education Program applies to all directors, officers, employees, contracted personnel, medical staff members, volunteers, students, contractors and agents (collectively referred to as "Affected Individuals").

Procedure:

CHS' Compliance Training and Education Program consists of:

- New Employee Orientation
Where possible, within 30 days of start date, all Affected Individuals will receive compliance orientation. CHS' compliance orientation provides an opportunity for the individual to meet the Compliance Officer, learn about the Compliance Program, Compliance Plan, other Policies and Procedures as well as reporting systems and Non-Retaliation and Non-Intimidation protections.
- Annual training (assigned through the LMS)

Among other topics, the Compliance Training and Education Program consists of:

- Definitions of Fraud, Waste and Abuse
- Compliance risk areas:
 - Billings
 - Payments
 - Medical necessity and quality of care
 - Governance
 - Mandatory reporting
 - Credentialing
 - Other risk areas identified by CHS.

All references to Centralus Health, Inc. include: Arnot Ogden Medical Center; Arnot Medical Services, PLLC; Cayuga Medical Associates, P.C.; Cayuga Medical Center at Ithaca, Inc.; The Ira Davenport Memorial Hospital, Inc.; Schuyler Hospital, Inc.; Visiting Nurse Service of Ithaca and Tompkins County, Inc.; Community Health and Home Care, Inc.; Cayuga Health Transport, LLC; Ithaca Alpha House Center, Inc. d/b/a Cayuga Addiction Recovery Services; and other locations



- HIPAA training
- Guidance on dealing with compliance issues.
- How to communicate compliance issues.
- Guidance on how potential compliance problems are investigated and resolved.
- The Compliance Training and Education Program is reviewed annually and updated as necessary to address new or changing risk areas.

Compliance Expectations

- Expectations related to conduct that supports integrity in operations.
- Introduction to the Compliance Program's policies and procedures and an examination of compliance expectations.
- Reporting procedures and identification of the Compliance Officer.
- Review of disciplinary policies related to the Compliance Program.
- Expectations for reporting compliance issues.
- Expectations for assisting in the resolution of compliance issues.
- Sanctions for failing to report suspected problems.
- Sanctions for participating in non-compliant behavior.
- Sanctions for encouraging, directing, facilitating or permitting non-compliant behavior.
- Expectations that compliance-related disciplinary policies are fairly and firmly enforced.

Compliance information on the Intranet and Website

The Compliance Program hosts pages on the Cayugahealth.org and the arnothealth.org websites to allow for Affected Individuals to have easy access to Compliance Program materials and information.