



Effective: 4/8/20

Innovative Health Alliance of New York, LLC
Category: MSSP Compliance
COMPLIANCE TRAINING

POLICY

Innovative Health Alliance of New York, LLC (IHANY) will comply with Medicare Shared Savings Program ("MSSP") requirements to provide compliance training for IHANY personnel providing direct support to IHANY operations and employees of ACO Participant organizations directly involved in providing care to IHANY aligned beneficiaries in accordance with Centers for Medicare and Medicaid Services ("CMS") regulations.

PROCEDURE

1. IHANY will provide compliance training designed to achieve the following objectives:
 - a. Emphasize the commitment of IHANY to conduct its activities in compliance with all laws and regulations and with the highest ethical and professional standards.
 - b. Promote awareness and understanding of compliance requirements specific to IHANY's participation in the MSSP.
 - c. Provide information regarding IHANY's Integrity & Compliance Program, including resources available to answer questions and to report issues and concerns, including suspected fraud, waste, and abuse or violations of laws and regulations.
 - d. Promote the obligation of all individuals to support the IHANY Integrity & Compliance Program.
2. IHANY may provide additional compliance training in response to specific issues identified as part of IHANY's operating activities, compliance issues identified in industry, or legal and regulatory changes.
3. IHANY will maintain documentation evidencing completion of compliance training requirements, including compliance training materials, HealthStream completion reports and/or compliance training attestations in accordance with IHANY's record retention policies.

DEFINITIONS

Accountable Care Organization ("ACO") means a legal entity that is recognized and authorized under applicable State, Federal, or Tribal law, is identified by a Taxpayer Identification Number (TIN), and is formed by one or more ACO participants.

ACO Participant(s) means an individual or group of ACO provider(s)/supplier(s) that is identified by a Medicare-enrolled Tax Identification Number (TIN), that alone or together with one or more other ACO participants comprise(s) and ACO, and that is included on the required list of ACO participants.

POLICY CONTACT

For questions regarding this policy, please contact IHANY’s Integrity & Compliance Department at 518-525-1378.

RELATED PROCEDURES AND OTHER MATERIALS

- 42 C.F.R § 425.30(a)(4). *Compliance plan*

Approving Official: IHANY Board		Effective Date: 4/8/2020
Key Sponsor: IHANY Integrity & Compliance Officer		
Reviewed By: SPHP Integrity & Compliance IHANY COO		Original Date: 9/21/2015 Reviewed/Revised Date: 4/16/2018 – reviewed 4/8/2020 – reviewed/revised *Reviewed, No Revisions **Revised without Full Review
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