

Compliance Training Policy

Effective June 15, 2015

Policy

It is NSM policy to ensure that its employees and agents receive regular training on company policy, including the Compliance Program, fraud and abuse laws, and relevant Medicare and payer guidelines.

All NSM employees and other individuals identified by the Director of Compliance will receive compliance education and training in accordance with this Policy.

Each training year, NSM employees will receive updated compliance education and training. Compliance training, including orientation for new employees will, at a minimum, address:

- The purpose of the training and why a Compliance Program was established;
- The organization, structure, and management of NSM's Compliance Program;
- The role and responsibilities of NSM's Compliance Program;
- Employee and management compliance responsibilities;
- The content of the NSM Code of Conduct;
- Key NSM compliance policies and procedures;
- Applicable federal laws, regulations, and guidelines;
- Operation of the NSM employee hotline; and
- How NSM employees can report problems without fear of retribution or retaliation.

NSM employees performing certain job functions may be required to receive specialized training in addition to the annual training noted above to address high-risk issues related to their work responsibilities.

Members of NSM's Board of Directors will be provided periodic training regarding the Compliance Program and their oversight responsibilities.

Why do we have this policy?

The purpose of this Policy is to establish participation requirements for compliance education and training for both current and new employees. Proper training will help ensure that all NSM employees have the information they need to perform their jobs properly, while maintaining compliance with all applicable laws and regulations, and with NSM Policies and Procedures.

Compliance Training Policy (cont'd)

Procedure

Training

The completion of one to two hours of annual Compliance training is mandatory for all NSM employees. Training may take place via live training sessions, on-line training courses, written training courses or a combination of any of these methods.

Employees with direct involvement in claims development and processing will receive additional specialized training in a review of Medicare requirements applicable to intake and/or processing, including coding.

Employees with direct business relationships with referral sources, including physicians and therapists, will receive additional specialized training, including an overview of the fraud and abuse laws as they relate to prohibitions against payments for referrals, kickbacks and rebates, and, other illegal inducements.

The Director of Compliance and the Compliance Committee are responsible for coordinating with management to ensure that specialized compliance education is developed and delivered in areas identified as having high compliance risk.

New employees will receive initial Compliance education and training within 30 days of being hired.

Any new employee entering or any current employee transferring into a job function that requires specialized training must complete the required training within 30 calendar days of beginning the job. Prior to the completion of the specialized training, the employee's work must be reviewed, as it relates to the subject matter of the specialized training, by a qualified person who has experience in the position.

Annual compliance education and training will be offered throughout the year to ensure that each NSM employee has the opportunity to receive the training. Current employees must complete the compliance education and training by the date established by the Director of Compliance or no later than the end of each training year.

Compliance Training Policy (cont'd)

Documentation

Training Records

Training attendance will be evidenced through sign-in sheets, on-line confirmation or other effective means. The Director of Compliance, working with Human Resources, will ensure that all training is tracked.

Each employee's record of participation in compliance training will be maintained by either the Human Resources Manager or the Director of Compliance.

Effectiveness of the Compliance Program training and education will be measured either by testing employees on the content of the program or through the use of periodic surveys and questionnaires to evidence their understanding of the training. All records evidencing effectiveness of compliance training and education will be maintained by the Director of Compliance.

Code of Conduct Acknowledgments

In order to emphasize the importance of NSM's commitment to full compliance with law and policy, all current employees and agents are required to sign and return a Code of Conduct Acknowledgment to the Director of Compliance. The Acknowledgment is a statement certifying that they have received, read, understood, and will abide by the Code of Conduct, including the Corporate Compliance Program. All new employees and agents are also required to execute the Code of Conduct Acknowledgment as part of their Orientation. Employees will sign a new certification each time new standards of conduct are issued. The employee's signed certification will be retained in the employee's personnel file and available for review by the Compliance Officer.

The Director of Compliance, with support from the Compliance Committee, will update the Compliance Manual and Code of Conduct regularly as statutes, regulations, and requirements are modified and/or clarified.