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Owner:	<i>Kelly Thomas: Chief Compliance &amp; Ethics Officer</i>
Area:	<i>Corp CCE - Corporate Compliance &amp; Ethics</i>
References:	

## Compliance Training & Education

### PURPOSE

All employees of American Health Companies, Inc. d/b/a American Health Partners (AHP) and its affiliates receive appropriate training and comply with all state and federal laws and regulations, and company compliance requirements and policies. Employees include all covered persons as defined below.

### POLICY

It is the policy of AHP and its affiliates to ensure that all employees receive appropriate training about the company's compliance program and policies, as well as all Covered Persons as required.

### PROCEDURE

All employees will receive and acknowledge the Code of Conduct and complete General Compliance training within 30 days of hire and annually thereafter. A record will be kept of each employees' adherence to these training requirements.

General compliance training includes the following specific topics:

- the Compliance Program;
- risk areas identified by the Office of Inspector General (OIG), as well as business line specific risk areas;
- Federal and State False Claims Acts;
- Stark and the Anti-Kickback Statute;
- Non-Retaliation;
- Compliance Committees; and
- Reporting Concerns.

Tennessee Health Management, Inc. (THM) has additional training obligations for covered persons pursuant to the Corporate Integrity Agreement (CIA) regarding: (a) the requirements of the CIA, as well as requirements to ensure that all Covered Persons receive at least annual training; and (b) Board Member training.

"Covered Persons" includes: 1) all owners, officers, directors and employees of THM; 2) all contractors, subcontractors, agents, and other person who furnish patient care items or services or who perform billing or coding functions on behalf of THM, excluding vendors whose sole connection with THM is selling or otherwise providing medical supplies or equipment to THM; and 3) all physicians and other non-physician practitioners who are members of THM's active medical staff.

### Attachments:

No Attachments

## Approval Signatures

Approver	Date
Ben Sparks: AGC [LC]	05/2019
Kelly Thomas: Chief Compliance & Ethics Officer [LC]	05/2019
Kelly Thomas: Chief Compliance & Ethics Officer [LC]	05/2019
Laura Carrico: Director of Compliance	05/2019