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Owner Deanna Nicolozakes:
Director,
Compliance &
PMG Compliance
Officer

Area Compliance

Applicability Privia Health and
All Markets

Compliance Training

1. Scope.

This policy applies to the officers, directors, and workforce of (1) Privia Health Group, Inc., its subsidiaries, and affiliates (collectively "Privia"), (2) any entity for which Privia is contractually obligated to manage such entity's compliance program, including Non-Owned Medical Groups, and (3) Care Centers who access Privia's Technology Platform.

2. Purpose.

Privia is committed to promoting a strong compliance culture that encourages all members of the Privia workforce to conduct themselves with the highest legal and ethical standards. It is the responsibility of every member of the Privia workforce to be aware of key compliance issues that impact their jobs daily. Mandatory compliance training is intended to educate Privia workforce members on important compliance policies and procedures and ensure compliance with applicable laws, regulations and third party payor requirements (including CMS and payor mandates).

3. Definitions.

1. "Workforce" means employees, volunteers, trainees, and any other person whose conduct, while performing work for Privia or a Care Center, is under the direct control of Privia or the Care Center, regardless of whether, or by whom, they are paid and regardless of whether they are full-time, part-time, permanent or temporary. All Workforce users must complete Compliance Training. (Examples include, but are not limited to: Privia or Care Center employees, temp or agency staff.)
2. "Non Workforce" means Privia or a Care Center does not have control over the work and/or the

individual performing the work on behalf of Privia or Care Center. Non-Workforce users do not require Compliance Training. (Examples include, but are not limited to: students, hospitalists, phlebotomists employed by outside lab, Care Center's third party accountant or bookkeeper.)

3. "Privia University" means the Learning Management System used by Privia, currently Docebo, and accessible [here](#) by Privia Employees or Contractors and using Privia Connect for Care Center users.
4. "Learning Plan" means collection of courses and knowledge checks curated for a target audience. Compliance Learning Plans are designed and assigned based on roles (or types of roles) defined by Compliance and fulfilled by the assignee and are generally published annually to be used for the following twelve month period.
5. "ACO Related Individual" means ACO officers, directors, employees, ACO Participant, ACO Provider/Supplier, or any other individual or entity providing functions or services related to ACO Activities.

4. Policy.

1. Privia Compliance Training is required to be completed by all new workforce users within 30 days of hire (or go-live for new Care Centers) and annually by the assigned due date.
2. Compliance Training Learning Plans are assigned to existing users through Privia University and must be completed by the assigned due date.
3. Timely completion of assigned Compliance Training is a condition of continued access to Privia's Electronic Health Record (EHR). Completion of Compliance Training is a condition of employment (Privia Employees and Contractors).

5. Procedure:

Mandatory compliance training is offered online through Privia University. Compliance training is published for both new and existing Privia workforce members as described below:

1. **General Compliance Content:** Privia Annual Compliance Training course material is re-reviewed (and role-targeted Learning Plans are updated annually) by Compliance, Privacy, Legal and IT Security and, at a minimum (depending on role), includes:
 - General Compliance Training and Fraud Waste and Abuse (FWA) Training
 - HIPAA Privacy and Security Training
 - Review of healthcare related laws and regulations
 - Need to prevent, detect and correct non-compliance
 - Requirement to report any known or suspected noncompliance to the Privia Compliance Officer, plan sponsor or CMS
 - Mechanisms for reporting non-compliance
 - Examples of reportable non-compliance
 - Overview of the monitoring and auditing process
 - Review of the penalties for noncompliance

- Legal protections for those who report compliance concerns.
 - Expectations to abide by the Code of Conduct and required attestation
 - Conflicts of interest
 - Record retention for governmental programs
 - Ethics in Business Training including insider trading and obligation to protect material nonpublic information
 - Cultural Competency
2. **MSSP ACO Specific Content:** All ACO Related Individuals are required to complete ACO Specific Compliance Training, in addition to other learning plan assignments as applicable. ACO Related Individuals not on Privia’s Platform are assigned an attestation course, attesting to components of their compliance program. The attestation course includes copies of Privia Health’s compliance training, Code of Conduct, Compliance Plan, Conflict of Interest policy and disclosure form and other compliance related documents (ethics line poster, beneficiary notifications etc.).
 3. **Assignment.** Compliance works with Learning to maintain a catalog of role based learning plans that are assigned to users in Docebo.
 4. **Attendance Tracking.** Members of the Privia workforce will complete training on-line via Privia University and will have their completion tracked in that system. Training completion records are retained for 10 years.
 5. **Additional Training.** Privia may require additional, specialized training as considered necessary.

Approval Signatures

| Step Description | Approver | Date |
|---|---|---------|
| Chief Audit & Compliance Officer Approval | Dana Fields: Chief Audit & Compliance Officer | 07/2024 |
| Compliance & Audit Leadership #1 | Deanna Nicolozakes: Director, Compliance & PMG Compliance Officer | 06/2024 |
| | Deanna Nicolozakes: Director, Compliance & PMG Compliance Officer | 06/2024 |