

CHILDREN’S HOSPITAL LOS ANGELES MEDICAL GROUP
COMPLIANCE POLICY MANUAL

POLICY	Corporate Compliance Program Education & Training
SIGN OFF	Robert Adler, M.D., CHLAMG Compliance Officer
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POLICY

CHLAMG Corporate Compliance Program includes flexible education and training content and schedules for providers and staff to meet the needs of Children’s Hospital Los Angeles Medical Group, Inc., and its affiliates.

COMPLIANCE TRAINING CALENDAR

Standard Module:

This program consists of Evaluation and Management (E/M) documentation and coding education, Compliant Documentation for Teaching Physicians (Compliance Policies: General Standard for E/M, General Standard for Anesthesia, and General Standard for Surgery policies); Documentation, Coding, and Billing for Non-Physician Practitioners. The Compliance Department offers this course at the convenience of physicians, and physicians can schedule a course by contacting the compliance department at CHLAMGcompliance@chla.usc.edu.

Annual ICD-10-CM and Charge Capture Update:

The Compliance department provides this program annually for physicians and the divisions’ business manager or designee to review annual ICD-10-CM and CPT changes, including new and deleted codes and regulatory coding guidance that CMS issues annually. The Compliance Department covers these topics in the following units:

- Annual charge entry/ticket update meeting: Division business designees or physicians who are primarily accountable for managing the charge capture process in their departments attend this meeting. This meeting gives attendees education about the code changes, as well as instruction on updating demographic information on the charge ticket or data entry screens.
- Annual ICD-10-CM and CPT code change education: The compliance department offers these sessions to divisions whose specialty specific codes have been updated for the coming year. These sessions are optional, CHLAMG highly encourages them.

Topic Specific Education:

The Compliance Department provides meaningful and timely updates to internal and external changes through a variety of media including newsletters, mass-email notification, and didactic discussion. Compliance staff attend regularly or special scheduled meetings of division/faculty, ambulatory services managers, non-physician practitioner meetings, etc., to provide topic-specific updates. A new or revised policy/procedure pertaining to the topic generally accompanies these sessions. For example, the Compliance Department provided information pertaining to the 2010 Medicare National Coverage Determination to discontinue acceptance of consultation codes at division meetings, hospital meetings, letters and mailings, and emails.

One-on-One Training:

The Compliance Department maintains an open door policy for communication and emphasizes education as a primary focus to ensure good business relations. The Department can provide education on any topic via request of the individual. In addition, the Compliance Department may require or provide special compliance training at any time if audit findings, Hotline complaints, or direction from the Executive Compliance Committee warrants it.

Online Training – Physicians:

In coordination with CHLA, the Compliance Department provides annual compliance training through the iLearn system. This policy requires physicians to receive one-hour of continuing education (1 CE) per year. Physicians can accomplish this by accessing the iLearn program, or by attending a didactic program that the CHLAMG Compliance Department provides.

External Training – Physicians:

Physicians may attend external courses covering compliance topics, but the CHLAMG Compliance Director must approve the curriculum in order to implement any of the teachings or recommendations physicians learn during courses. This policy ensures that external training meet internal guidelines. Many external programs are Medicare specific and do not cover Medi-Cal regulation which can create misunderstanding or cause staff to misapply regulations and incorrect revenue presumptions.

Orientation – Physician or Non-Physician Practitioner (NPP):

CHLAMG requires all physicians or non-physician practitioners who bill under CHLAMG, PMG, PAHO or other entities of CHLAMG, Inc., to attend one hour of revenue cycle specific compliance training prior to billing. Revenue cycle specific training also covers HIPAA Privacy and Security policies and procedures. In addition, CHLAMG strongly encourages residents/interns/fellows to attend a session prior to the completion of their residency at CHLA. Residents, fellows, and interns can meet this requirement by attending the general orientation sessions, scheduling an orientation session with the compliance director, or attending the PMG Revenue Cycle and Compliance training. This is a mandatory session. NPP's must complete this training prior to billing under CHLAMG or PAHO Tax ID number(s). Physicians must complete this training within the first 30 days of clinical care.

Orientation – Revenue Cycle Management staff:

CHLAMG provides orientation to all employees at CHLA, CHLAMG, PMG, or PAHO who work directly with the revenue cycle through the continuum. The Compliance Department presents and discusses specific guidelines for adhering to hospital and medical group corporate compliance and HIPAA policies. This training is mandatory and employees must attend orientation within 30 days of start date of clinical care.