

	POLICY AND PROCEDURES		
	POLICY NUMBER:	CHLAMG-CI-1008	
	ORIGINAL DATE: 11/1/2018	REVISED:	EFFECTIVE: 12/26/2018
DEPARTMENT: Compliance	APPROVED BY: Carl Grushkin, MD and Chief Compliance Officer		
POLICY TITLE: Compliance Education and Training			

PURPOSE:

This policy establishes healthcare compliance education and training requirements for CHLAMG and PMG workforce members. For the purposes of this policy, healthcare compliance content includes areas that are within the scope of the CHLAMG/PMG Compliance Program. This policy does not address other compliance training requirements, e.g., unlawful harassment, that are outside the scope of CHLAMG/PMG Compliance.

SCOPE:

This standard applies to all healthcare professionals and other CHLAMG/PMG workforce members.

DEFINITIONS: None

POLICY:

CHLAMG/PMG Compliance develops and implements healthcare compliance education and training as required by law, regulatory changes, and trends observed through risk assessments, auditing and investigations. The Compliance Department develops annual training plans, documents and monitors training completion, and reports regularly to the Executive Compliance Committee. Other PMG departments may provide additional healthcare compliance training as needed.

PROCEDURES:

A. HEALTHCARE COMPLIANCE TRAINING REQUIREMENTS:

Education Type/Frequency	Audience	Content Owner	Content
Initial onboarding upon hire or time of engagement (within 30 days)	All CHLAMG Workforce members	Compliance	Includes but is not limited to general education and awareness in the following areas: <ul style="list-style-type: none"> ▪ Centers for Medicare & Medicaid Services (CMS) General Compliance Education ▪ Fraud, Waste and Abuse awareness and prevention ▪ Anti-kickback and Stark Law ▪ Conflicts of interest ▪ Code of Conduct ▪ HIPAA and state patient information privacy and security including breach notification

Education Type/Frequency	Audience	Content Owner	Content
Job or department-related onboarding (30 days)	Role-based	PMG/CHLAMG Division	As determined by departments/divisions to educate about procedures and practices.
	Provider New Hires	Compliance	Guidelines for proper medical record documentation.
Refresher Education (annual)	All CHLAMG/PMG Workforce members	Compliance	Refresher training reinforces and expands upon content received at onboarding as well as new or revised policy requirements.
Ad hoc (as needed)	Ad hoc/role-based	Compliance	See B. below.
	Providers		Providers may be required to complete additional education based on chart audit results or other compliance/privacy findings.

B. TRIGGERS FOR ADDITIONAL COMPLIANCE EDUCATION AND OUTREACH

- Job Changes.** A role, duty or position change may trigger additional role- or department-specific healthcare compliance training; training completion may be mandated by a specific date or within a certain number of days after the job change.
- Regulatory and Policy Changes/Trends.** Ongoing or ad hoc education and outreach is provided in response to or in preparation for developments in the legal and regulatory environment, policies and procedures, and general trends in healthcare compliance.
- Audit Results and Investigations.** Additional education and training may be required or recommended in response to compliance audit results and/or trends, and the outcomes of internal or external compliance investigations.

C. DOCUMENTATION REQUIREMENTS

Document Type	Responsible Party
<p>Onboarding documentation</p> <p>Training documentation. All healthcare compliance education and training documentation and records of attendance and completion. (6 years)</p>	<p>Where maintained in hard copy, by the supervising department or division.</p> <p>Where maintained in the learning management system (I-Learn) by the system</p> <p>Where maintained in hard copy, by the supervising department or division.</p> <p>For provider E/M audit education, MD Audit.</p>
<p>Role-based documentation</p>	<p>Where maintained in hard copy, by the supervising department or division.</p>
<p>Privacy, Confidentiality and Information Security Agreement</p>	<p>Learning Management System</p>
<p>Code of Conduct Attestation</p>	<p>Learning Management System</p>
<p>Training materials. All original copies of healthcare compliance training materials. (6 years)</p>	<p>Compliance or department/division of origin.</p>

D. ROLES AND RESPONSIBILITIES

1. CHLAMG Compliance

- a. Develops and implements healthcare compliance education, training and outreach materials for certain onboarding and role-based healthcare compliance training.
- b. Updates and maintains healthcare compliance education, training and outreach materials in accordance with legal and regulatory updates, industry trends and observations of auditing, investigations and risk assessment.

2. CHLAMG/PMG Business and Clinical Leadership

- a. Champion education, training and outreach and convey healthcare compliance education goals expectations to operational areas.
- b. Identify gaps in compliance education and work with Compliance to resolve/remedy educational needs in risk areas.
- c. Facilitate understanding of compliance issues and direct questions, as needed, to the Compliance Department.

3. Workforce members and providers

- a. Complete all applicable onboarding, role-specific and annual refresher education.
- b. Acknowledge and sign the Code of Conduct attestation upon initial hire or engagement.

- c. Acknowledge and sign the Privacy, Confidentiality and Information Security Agreement upon hire or engagement and annually.

REFERENCES:

U.S. Sentencing Commission Guidelines Manual, §8B2.1 (November 2016)

Compliance Program Guidance for Individual and Group Physician Practices, 65 Fed. Reg. 59424 (October 2000)

HIPAA, Pub. L. No. 104-191, 45 C.F.R. §§ 160 and 164 (1996)

Deficit Reduction Act of 2005, Pub. L. No. 109-171, §6032 (2006) codified at 42 U.S.C. §1396a(a)(68)

Mulcahy, G. Medicare Parts C and D Oversight and Enforcement Group. (June 17, 2015). *Update – Reducing the Burden of the Compliance Program Training Requirements*. Department of Health & Human Services, CMS. Available at [https://www.cms.gov/Medicare/Compliance-and-Audits/Part-C-and-Part-D-Compliance-and-Audits/Downloads/Update Reducing Burden CP Training-Requirements.pdf](https://www.cms.gov/Medicare/Compliance-and-Audits/Part-C-and-Part-D-Compliance-and-Audits/Downloads/Update%20Reducing%20Burden%20CP%20Training-Requirements.pdf).

Mulcahy, G. Medicare Parts C and D Oversight and Enforcement Group. (February 10, 2016). *Additional Guidance – Compliance Program Training Requirements and Audit Process Update*. Department of Health & Human Services, CMS. Available at [https://www.cms.gov/Medicare/Compliance-and-Audits/Part-C-and-Part-D-Compliance-and-Audits/Downloads/2016 Compliance and - FWA Training Requirement Update.pdf](https://www.cms.gov/Medicare/Compliance-and-Audits/Part-C-and-Part-D-Compliance-and-Audits/Downloads/2016%20Compliance%20and%20FWA%20Training%20Requirement%20Update.pdf)

POLICY OWNER: CHLAMG/PMG Compliance Director

Approved by CHLAMG Executive Compliance Committee on December 26, 2018.