

Compliance Plan Education and Training Requirements

The Governing Board shall be responsible for ensuring that the policies concerning documentation and billing are communicated and understood by faculty physicians, residents and staff. The Compliance Officer and the Compliance Auditor will work collaboratively with the Department, Graduate Medical Education Office, and Compliance Coordinators to ensure that there is a systematic and ongoing training and education program. The training and education program shall strengthen and maintain awareness of billing and documentation policies among existing faculty physicians, staff and new personnel. The Compliance Auditor in collaboration with the Department will develop training materials.

Annual training shall be mandatory for all physicians, fellows, residents and other health professionals who bill for their services and/or document medical records. The department may request education and training programs through the Compliance Auditor. The training materials will identify resources and individuals that can be contacted about billing questions or issues that arise.

Compliance Plan Education Programs for New Department Procedures

Upon employment of a faculty physician or staff member who may be involved in providing patient care services or billing, these individuals will be required to attend a compliance program training session prior to any claims being submitted for payment on their behalf. It will be the Compliance Auditor's responsibility to provide departments with a compliance plan and update it when new information becomes available. He/she will also be accountable to provide the Compliance Coordinators with new or revised compliance plan material which, in turn, has to be distributed to the faculty physicians and staff. It will be the responsibility of the Compliance Coordinators of the department to ensure that new employees receive the required training from the Compliance Office and the compliance plan document.

Education Session

The Education session will include:

- Review of materials in the compliance plan.
- Emphasis on Medicare regulations and HCFA documentation guidelines which pertain to the faculty physicians.
- A question and answer session.

Not less than one hour annually of training relating to departmental patient registration personnel.
Not less than two hours annually of training relating to departmental faculty physician and clinical staff.

Not less than two hours annually of training relating to departmental billing personnel.

The Compliance Auditor shall document the training provided to each faculty physician and staff member. The documentation shall include the names, dates and duration of the educational program; and a brief description of the subject matter of the education provided.

Education activities include, but are not limited to, educational sessions, and participation in departmental meetings in which compliance and claim submission processes are addressed.