

Policy Title:	Compliance Education and Training (CMP)
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Associated Forms and Policies	
Regulation Reference <i>(if applicable):</i>	NYS Social Services Law (SSL) §363-d and 18 NYCRR Part 521; US DHHS, OIG Hospital Compliance Guidance, 1998; Supplemental Hospital Compliance Guidance, 2005
Key Words:	CBL, Compliance, Education, Training, NEO

I. Policy

It is the policy of Crouse Medical Practice (CMP) to conduct an effective compliance training and education program to help ensure that all [affected individuals](#) who perform a function on behalf of Crouse Medical Practice is fully capable of executing their duties in conformity with applicable laws, rules, regulations and other standards.

II. Purpose

As part of the Compliance Plan, employees are required to attend specific training on a periodic basis. Such training programs may include sessions highlighting the Plan, summarizing fraud and abuse laws, coding requirements, claim development and submission processes and marketing practices that reflect current legal and governmental program standards. They are designed to effectively communicate CMP's standards and procedures. Practice Managers assist in identifying areas that require training and in carrying out such training. Training instructors may come from both outside and inside CMP. New staff will receive training as part of the new hire orientation process. All formal training undertaken by CMP as part of its Compliance Plan is documented. Appropriate documentation includes a record of dates, times, attendance and agenda for all professional and compliance training sessions in which staff participates. Copies of materials disseminated at training sessions will also be maintained to the extent feasible.

III. Scope

This policy applies to all persons who are affected by Crouse Medical Practices risk areas.

IV. Procedure

Responsibility for Compliance Education and Training Oversight

- The Compliance Officer (CO) is responsible for general oversight of all affected individuals compliance education and training and shall conduct the employee educational sessions required by this policy and/or shall ensure that sessions occur.

Board of Directors

- Each Member of the Board of Directors shall receive initial compliance training promptly after

appointment to the Board and on a regular basis thereafter, during such Member's term. Generally, the CO shall provide such instruction to Board Members. The Board shall receive a copy of the Code of Conduct, and shall be given access to the current Corporate Compliance Plan. The distribution of the Code of Conduct to Board Members shall be documented. The Corporate Compliance Committee will meet quarterly which includes the Board.

Code of Conduct/Compliance Policies & Procedures

- Distribution to Employees. All new employees are directed on where to find the Code of Conduct and Corporate Compliance Plan at New Employee Orientation ("NEO"). The Code of Conduct and Crouse Medical Practice's Corporate Compliance Plan shall be available as amended on the CMP website <https://crousemed.com/compliance/> and the CMP shared data drive. Employees may also request a hard copy of the Code of Conduct and the Corporate Compliance Plan from the Compliance Officer at (315) 470-2368.
- Website. Crouse Medical Practice's Code of Conduct, Compliance Plan and relevant compliance policies and procedures are available on the website and shall be maintained and reviewed at least annually by the Compliance Officer or their designee, in cooperation with Information Technology.

Training and Education

- Crouse Medical Practice shall establish and implement an effective compliance training and education program for all affected individuals. Training and education shall be provided in a form and format accessible and understandable to all affected individuals, consistent with Federal and State language and other access laws, rules or policies.
- Training and Education shall occur no less frequently than annually and will include the following topics:
 - General overview of Crouse Medical Practice's Code of Conduct, Corporate Compliance Program, and compliance related policies and procedures;
 - Relevant health care fraud and abuse laws;
 - CMP risk areas and organizational experience;
 - Role of the Compliance Officer and Compliance Committee;
 - How affected individuals can ask questions and report potential compliance-related issues to the Compliance Officer and senior management, including the obligation to report suspected illegal or improper conduct and the procedures for submitting such reports;
 - Crouse Medical Practice's non-intimidation/ non-retaliation and whistleblower policies and protection for good faith participation in the compliance program;
 - Disciplinary standards, with an emphasis on standards related to the compliance program and the prevention of fraud, waste and abuse;
 - How CMP responds to compliance issues and implements corrective action plans;
 - Coding and Billing requirements;
 - Claim development and submission process;
 - Other compliance topics as deemed appropriate by the Compliance Officer.
- Crouse Medical Practice will develop and maintain a training plan. The training shall include:
 - An outline of the subjects and topics for the training education;
 - The timing and frequency of the training;
 - Which affected individuals are required to attend;
 - How attendance will be tracked; and
 - How the effectiveness of the training will be periodically evaluated.

Please refer to the Compliance Work Plan for additional information.

New Employee Orientation

- A. Scope of General Orientation. All new employees shall undergo appropriate levels of compliance training during New Employee Orientation (NEO) that occurs promptly after hiring.
- B. Content of NEO. Compliance-related matters covered in NEO may include, but are not limited to, the following areas:
1. General overview of Crouse Medical Practice's Code of Conduct and Compliance Program;
 2. Relevant health care fraud and abuse laws;
 3. How to contact the Compliance Officer;
 4. Crouse Medical Practice non-intimidation/non-retaliation and whistleblower policy; and
 5. Other compliance topics as deemed appropriate by the Compliance Officer.

Annual Compliance Update

- Computer-Based Training. For purposes of completing annual compliance training, employees shall participate in computer-based compliance education and training modules. The CO or their designee in consultation with Human Resources shall determine the content and duration of annual compliance training materials.

Job Specific/Targeted Compliance Education & Training

- A. Targeted Education. Crouse Medical Practice recognizes that the duties of certain employees affect the accuracy of claims for reimbursement submitted to government payers, such as Medicare and Medicaid, and to private payers. Consequently, it is important for certain employees to receive targeted compliance education and training, including periodic updates.
- B. Employees Identified for Targeted Education. The CO or their designee in consultation with various departments shall identify those employees who require targeted education. Specific training topics may include but are not limited to:
- Government and private payer reimbursement principles;
 - General prohibitions on false claims, self-referrals and the payment or receipt of remuneration to induce referrals;
 - Proper confirmation of diagnoses or interpretations;
 - Submitting a claim for physician services when rendered by a non-physician (under "incident to" supervision, and physical presence requirements);
 - Proper documentation of services rendered; and
 - Duty to report misconduct.

Other Venues for Education

- A. Other programs/meetings. The Corporate Compliance Officer shall make themselves available for any other department meetings or ad-hoc education sessions.
- B. Compliance/Ethics Week. The Corporate Compliance Officer coordinates Compliance/Ethics week. It is an interactive week for all employees to participate and engage in compliance related activities.

Other Forms of Communication.

- A. Informer. The *Informer* is a Crouse Medical Practice newsletter that includes current events. The Corporate Compliance Officer shall periodically submit entries for inclusion in the *Informer* pertaining to compliance and/or HIPAA security information.

Professional Educational Courses

- Periodic professional continuing education courses required by applicable state and/or federal law and regulation for certain Crouse Medical Practice personnel shall be administered by Human Resources and/or Educational Services.

Compliance Education and Training as Part of Employee Evaluation Process

- A. Attendance Required. Attendance at NEO and participation in annual/periodic compliance education and training (including targeted sessions for certain employees, as applicable) is an expectation of performance for all employees, which shall be reflected in employee evaluations.
- B. Sanctions. Failure to attend and/or participate in required compliance education and training sessions may result in discipline, up to and including termination of employment or affiliation with Crouse Medical Practice.

Documentation and Retention of Attendance Logs and Other Materials

- A. Human Resources, in collaboration with the Corporate Compliance Officer, shall maintain attendance logs for all compliance education and training sessions conducted. Attendance logs should include, but are not necessarily limited to, the following information:
 1. Employee name and title;
 2. Employee's department;
 3. Date and time of attendance; and
 4. General description of the educational session (attach program information/ handouts).
- B. Attendance logs plus program attachments and other documentation required by this policy shall be retained for a minimum of six years, or in accordance with CMP's record retention policies and procedures, whichever is longer.

Yearly Reevaluation of Compliance Education and Training Program

- A. At least annually, the Corporate Compliance Officer shall evaluate the effectiveness of Crouse Medical Practice's corporate compliance education and training efforts.
- B. The Corporate Compliance Officer shall take into consideration the OIG and OMIG's annual work plans and other compliance initiatives in developing the content of future compliance education and training programs.

V. Definitions

Affected Individuals: All persons who are affected by the providers risk areas including employees, chief executive and other senior administrators, managers, contractors, agents, subcontractors, independent contractors and governing and corporate offices.