

* **KING'S DAUGHTERS MEDICAL CENTER**

**ADMINISTRATIVE AND
MEDICAL STAFF POLICY**

POLICY AND PROCEDURE

EFFECTIVE DATE: 02/08/16

**SUPERCEDES AUDIT,
COMPLIANCE & ETHICS
POLICY DATED: 12/17/13;
7/01/12**

FILE: SECTION I (54)

**SUBJECT: COMPLIANCE AND
INTEGRITY EDUCATION
POLICY**

* **POLICY:** An effective compliance program must be supported by effective and timely education and training. Compliance training reinforces the Medical Center's commitment to preventing, detecting, and correcting fraud, waste and abuse and aligns with the educational requirements of the Corporate Integrity Agreement. The Compliance & Integrity Department will provide and monitor compliance training as set forth in this policy.

* **PROCEDURE:**

1. **General Compliance Training (GCT)**

A. **Initial Training.** The two (2) hour Initial General Compliance Training (IGCT) will be provided to Covered Persons as follows:

Covered Person	Timing	Responsible Party
New Team Members	Within 30 days of becoming a team member	Human Resources, Marketing and/or Learning & Development
New Physicians (employed and non-employed)	Within 30 days of becoming employed and/or credentialed	Medical Staff Office
Vendors/Contractors ¹	Within 30 days of entering the relationship and/or providing services	Director of applicable vendor/contractor
Affiliation Agreement Students	Within 30 days of beginning assignment	Director overseeing applicable affiliated organization

¹ Vendors/contractors who provide patient care items or services or who perform billing or coding functions on behalf of the Medical Center

Volunteers	Within 30 days of beginning assignment	Director overseeing volunteer program
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B. Annual Training. After receiving the IGCT, active Covered Persons will receive one (1) hour of GCT each year.

2. **Specific Compliance Training (SCT)**

A. Initial Training. The four (4) hour Initial Specific Compliance Training (ISCT) will be provided to Relevant Covered Persons as follows:

1. New team members (including physicians) who are involved, directly or indirectly, in the oversight, management or provision of interventional cardiac care at the Medical Center or who is involved in the quality assurance, credentialing, or peer review process (Relevant Covered Person) will receive the ISCT within thirty (30) days of becoming a Relevant Covered Person. The Director overseeing the applicable Relevant Covered Person is responsible to ensure same timely receives the ISCT.

B. Annual Training. After receiving the ISCT, active Relevant Covered Persons will receive two (2) hours of SCT each year.

3. **Arrangements Compliance Training (ACT)**

A. Initial Training. The three (3) hour Initial Arrangements Compliance Training (IACT) will be provided as follows:

1. New team members who are involved with the development, approval, management or review of the Medical Center's Focus Arrangements (agreements with referral sources to the Medical Center and/or between the Medical Center and any physician or medical practice) (Arrangement Covered Person) within thirty (30) days of becoming an Arrangements Covered Person. The Director overseeing applicable Arrangement Covered Person is responsible to ensure same timely receive the IACT;

2. Each party to a Focus Arrangement will receive the IACT within thirty (30) days of the effective date of the Focus Arrangement. The Compliance & Integrity Department, with the collaboration and assistance of the Focus Arrangement party contract owner, tracks participation.

B. Annual Training. After receiving the IACT, active Focus Arrangements Covered Persons will receive two (2) hours of ACT each year.

4. **Board Member Compliance Training (BCT)**

A. Initial Training. The three (3) hour Initial Board Member Compliance Training (IBCT) will be provided to new Medical Center board members within thirty (30) days of becoming a member. The Executive Assistant to the CEO is responsible to ensure same timely receive the IBCT.

B. Annual Training. After receiving the IBCT, active board members will receive two (2) hours of BCT each year.

5. **Executive Management Compliance Training (ECT)**

- A. **Initial Training.** The three (3) hour Initial Executive Member Compliance Training (IECT) will be provided to new members of the Medical Center's executive management team within thirty (30) days of becoming part of the executive management team. The Executive Assistant to the CEO is responsible to ensure same timely receive the IECT.
- B. **Annual Training.** After receiving the IECT, active members of the executive management team will receive two (2) hours of ECT each year.

6. **Training Certification.** Each person who is required to participate in the above-described compliance training shall certify, in writing or electronic form, that he/she received the required training.

7. **Training Monitoring.** The Compliance & Integrity Department will monitor and report the above-described compliance training. Team members who fail to timely participate in the above-described compliance training will be considered in the PFP (performance evaluation) process and/or team member may be disciplined accordingly.

President/CEO

Medical Staff President