

# SIU School of Medicine SIU HealthCare POLICY

## EMPLOYEE EDUCATION POLICY

### Policy

It is the policy of SIU to provide employees involved in the claim development and submission process or in business activities which may be subject to the fraud and abuse laws with such training as may be reasonably necessary and appropriate to ensure material compliance with applicable laws relating to the submission of claims or SIU business relationships.

### **I. Background**

SIU is committed to ensuring that its billing policies and procedures adhere to all federal and state compliance regulations. Towards this effort, SIU has approved a series of policies to meet the commitment. SIU collectively applies to the SIU School of Medicine (including the Federally Qualified Health Center (FQHC)) and the SIU HealthCare (SIUHC).

### **II. Policy**

The Compliance Training Program focuses on the following components: Fraud, Waste and abuse Training, General Compliance Awareness Training and Billing and Clinical Documentation Training.

#### **A. Fraud, Waste and Abuse Compliance Training**

The first component, Fraud, Waste and Abuse (FWA) Training is designed to provide education to officers, directors, providers, and employees of SIU of statutes, regulations, and agency directives relating to their individual functions within SIU. Training should include the standards of business conduct that such individuals are expected to follow and the consequences, both to the individuals and to SIU, that will ensue from any violation of these requirements. Annual FWA training will be assigned to all clinical staff and providers.

#### **B. General Compliance Training**

Compliance is everyone's responsibility and sets forth a code of conduct and emphasizes the institution's commitment to "do the right thing." This course educates employees on how a compliance program operates and how compliance program violations should be reported. All new employees will receive this training in orientation and this training will be incorporated into the annual training provided to SIU clinical staff and providers.

#### **C. Billing and Clinical Documentation Training**

SIU will provide the following education to employees involved in the claim development and submission process:

## **1. Billers/Coders/Charge Processors**

Annual training relating to one or more of the following subjects:

SIU's compliance program; an overview of the fraud and abuse laws as they relate to the claim development and submission process; a review of Medicare requirements applicable to the coding and preparation of claims; billing and proper documentation; and the consequences to individuals and SIU for failing to comply with applicable laws and regulations.

## **2. SIU HealthCare, all Physicians and Surgeons Responsible for Billing Activities, Resident Physicians and other patient care personnel**

a. Annual training relating to one or more of the following subjects:

SIU's compliance program; an overview of the fraud and abuse laws as they relate to the claim development and submission process; a review of Medicare requirements relating to teaching physician presence and E/M guidelines and adequate documentation of both; charge entry and coding (as applicable); and the consequences to individuals and SIU for failing to comply with applicable laws and regulations.

b. New Employee Training:

Plan providers, residents and SIU personnel who prepare, document or submit requests, and/or code services for reimbursement from patients, federal health care programs, and/or other payers must complete Billing and Documentation training. Requirements for Training are as follows:

- New providers will be required to take the training within 30 days of employment or within 30 days of their credentialing effective date (date provider number is issued), whichever is most recent.
- New residents and SIU personnel with patient care and medical billing responsibility will be assigned the training within 30 days of their start date or employment.

## **D. Standard Privacy Training – Health Insurance Portability and Accountability Act (HIPAA)**

HIPAA Compliance falls under 45 CFR 164.530 of the Administrative Requirements of the Privacy Rule. A covered entity (SIU) must train all members of its workforce on the policies and procedures with respect to protected health information (PHI) required by this Rule and as necessary and appropriate for the members of the workforce to carry out their functions within SIU.

## E. Other Mandatory Training

There are a number of other safety and compliance trainings (See Appendix A) that are required for employees to be updated and trained on annually to meet federal and state regulations. Other trainings are just required at new employee orientation.

## F. Documentation

SIU shall document the training provided to each employee. The documentation shall include the name and position of the employee, the date and duration of the educational activity or program and a brief description of the subject matter of the training.

Educational activities include, but are not necessarily limited to, SIU sponsored programs or educational sessions; viewing educational videos; completion of online training modules; participation in department meetings in which compliance and claim development and submission process issues are specifically addressed; attendance at carrier, intermediary or state sponsored educational sessions; and attendance at seminars, workshops or similar educational sessions.

## G. Methods of Instruction

1. Web-based modules
2. In-service training
3. Live or video seminars
4. Dedicated Web site
5. Grand Rounds
6. Communication via periodic electronic mail, newsletter, or other means

## H. Sanctions

1. Plan providers who fail to complete trainings within the aforementioned time frame will have billing privileges suspended. Services during the billing suspension period will not be submitted to third party payers or private pay patients until the training is completed. If a service is erroneously billed, charges will be adjusted or corrected, and any overpayment collected will be promptly refunded to the carrier or patient. Billing privileges will be reinstated upon the provider's completion of the required educational session. The Compliance Officer will notify the Department Chair and Director of Patient Business Services in writing of suspension and reinstatement requirements.
2. SIU personnel who fail to attend the training within the aforementioned time frame will be subject to disciplinary action imposed by the Office of Human Resources in consultation with the Dean of the School of Medicine, CEO of SIU Healthcare, Chief Medical Officer and the Compliance Officer. A memorandum, outlining the disciplinary action, consequences of failure to attend a mandatory program, and requirements for remediation, will be sent to the employee by the Chief Medical Officer. A copy will be maintained in the employee's personnel file with a copy sent to the employee's supervisor.

<b>Adopted: January 20, 1999</b>	<b>Contact: Compliance Officer</b>
<b>Revisions:</b> Approved by OCP: 1/11/2017 Approved by Quality and Safety: 2/21/2017	<b>References:</b> See Exhibit A

Exhibit A – Annual Mandated Training (Regulation or Policy)

<b>Training</b>	<b>Mandated By</b>	<b>Education Source</b>	<b>Frequency</b>	<b>Time</b>
AHEOP & Emergency Response Training	OSHA & IEMA	Campus Emergency Plan and Violence Prevention Plan	NEO/ Annually	.5 hrs
Asbestos	Asbestos Abatement; OSHA	General Industry	Annually (specific staff)	2 hrs
Basic Electrical and Power Tool Safety	OSHA	OSHA	NEO once (CPSO only)	.25 hrs
Blood borne Pathogens training	OSHA	Occupational Exposure Control Plan	NEO/ Annually	.25 hrs
Chemical Hygiene/ Lab Safety	OSHA	Lab Standard (Chemical Hygiene Plan)	Annually (specific staff)	1.5 hrs
Confined Space Entry	OSHA	OSHA	NEO once	.75 hrs
Emergency Group Leaders & Alternates	OSHA	Emergency Action Plan	Annually (specific staff)	.5 hrs
Fire Extinguisher Use	OSHA	Portable fire extinguisher	Annually (specific staff)	.25 hrs
Hand Hygiene	OSHA & CDC	Occupational Exposure Control Plan	NEO/ Annually	.25 hrs
Ladder/ Lift Safety	OSHA	General Duty Clause	NEO once (specific staff)	.25 hrs
Lockout/ Tag out	OSHA	OSHA	NEO/when necessary	.5 hrs
RAVE System	OSHA	Emergency Action Plan	NEO once	.5 hrs
Occupational Noise Exposure	OSHA	SIU Hearing Conservation Program	Annually (specific staff)	.75 hrs
Tuberculosis	OSHA	Tuberculosis Control Plan	Annually (specific Staff)	.25 hrs
DOT HazMat Security	DOT	SIU Hazardous Materials Security Policy	Once to specific staff	.25 hrs
DOT/IATA Shippers	DOT	SIU Hazardous Materials Security Policy	Every 2 years (specific staff)	2 hrs
Powered Industrial Trucks	Federal	Federal	NEO once(specific staff)	1.25 hrs
Respiratory Protection Program	Federal	Respiratory Protection Program	Annually (specific staff)	.75 hrs
SDS/ ChemWeb viewer	Hazard Communications Standard: Material Safety Data Sheets	Hazardous Communication Standard	NEO once	.5 hrs
Slips, Trips, and Falls	Federal	General Duty Clause	NEO once	.25 hrs
Lifting Ergonomics	Federal Recommendation	Federal	NEO (CPSO & Security)	.75 hrs
HIPAA Initial	Federal & State of IL	HIPAA Procedure Law	NEO/Once	1 hr
HIPAA Update	Federal & State of IL	HIPAA Procedure Law	Annually	.25 hr
MSDS Online Site Manager	Federal	Hazardous Communication Standard	One time training	.5 hrs
Violence against Women	Federal	Federal	NEO Once	1 hr
Sexual Harassment	Federal	Federal	NEO Once	1 hr

<b>Training</b>	<b>Mandated By</b>	<b>Education Source</b>	<b>Frequency</b>	<b>Time</b>
NIMS ICO Named Members Training	State of IL	Illinois Campus Security Enhancement Act	Once (specific staff)	.75 hrs
NIMS ICO Support Staff Training	State of IL	Illinois Campus Security Enhancement Act	NEO (CPSO)	.5 hrs
Occupational Exposure to Lab Animals	AAALAC Recommendation	AAALAC	NEO (DLAM)	.25 hrs
Radiation Awareness Training	State of IL	IEMA	NEO once	.25 hrs
Radiation Support Staff	State of IL	IEMA	Annually (specific staff)	.5 hrs
CB Online Training	SIU	SIU	NEO Once (Inquiry Access)	3 hrs
CB Universe	SIU	SIU	NEO Once (Clinical Staff)	5 days
CEMR	SIU	SIU	NEO Once (Clinical Staff)	1/2 day
Secure Messaging	SIU	SIU Security Policy	Once (specific staff)	.5 hrs
Medical Record Standard	SIU	SIU Medical Record Policy and Procedures	Annually (EHR users)	.75 hrs
Workplace Violence Prevention	Federal	Federal	NEO Once	1.5 hrs
Ethics Training	State of IL	State of IL	Annually and NEO within 30 days of hire	1 hrs
Fraud, Waste and Abuse Training	Federal & Contractual	Federal CMS	Annually and NEO	.25 hrs
General Compliance Training	Federal and Contractual	Federal CMS	Annually and within 90 days of hire	.50 hrs