

Policies and Procedures: Mandatory Compliance Training

Section: Compliance
Chapter: Administration
Policy: Mandatory Compliance Training; Enforcement

I. PURPOSE

To establish a policy which enforces the requirement of timely completion of mandatory compliance training for WVU faculty and WVUPC staff as required by federal authorities, contractual compliance obligations and/or by WVUPC's Corporate Compliance Plan.

II. APPLICABILITY

This policy applies to all WVUPC employees, including both WVU faculty and WVUPC staff.

III. POLICY

All employees, including WVU faculty and WVUPC staff, are required to complete mandatory compliance training within thirty (30) days of hire or contract date, within such other times as communicated by the WVUPC Director of Corporate Compliance & Regulatory Affairs, and once annually. Providers and relevant support staff may also be required to undergo supplemental training based upon the results of annual audit activities.

IV. PROCEDURE

1. Initial training for new providers and support staff:
 - a. Billing numbers will not be activated for any new provider until WVUPC Human Resources or WVUPC's Director of Corporate Compliance & Regulatory Affairs confirms that necessary training has been completed.
 - b. New support staff shall be required to complete all necessary compliance training within thirty (30) days of employment. Failure to comply with this requirement will result in temporary suspension without pay pending receipt of such training.
2. Governmentally Required Training:

- a. All providers and staff shall be required to attend all governmentally required training sessions by deadlines established by the Board of Directors in consultation with the Office of Corporate Compliance & Regulatory Affairs.
 - b. Whenever possible, mandatory compliance training obligations shall be communicated by the Director of Corporate Compliance & Regulatory Affairs to the Practice Administrators and Clinical Chairs no less than sixty (60) days in advance of governmentally imposed training deadlines. Training sessions will be scheduled as far as possible in advance, and held at such reasonable times and locations as to maximize the opportunities for attendance. Make up sessions will be offered at reasonable times and locations prior to any governmentally-imposed training deadlines.
 - c. In the event that a provider or support staff member fails to comply with any necessary training obligations as required by federal compliance and regulatory authorities, and such failure gives rise to federal fines or penalties, such fines/penalties shall be assessed to the delinquent provider's or staff member's clinical department.
3. Annual renewal training for existing providers and support staff:
- a. Billing numbers may be deactivated for any providers who fail to complete renewal training by deadlines established by the Board of Directors.
 - b. Billing numbers will not be reactivated until either Human Resources or WVUPC's Director of Corporate Compliance & Regulatory Affairs have confirmed completion of the necessary training modules.
 - c. Paychecks may be held for any provider who fails to complete mandatory training by specified deadlines. Support staff who fail to complete renewal training by the annual deadline(s) will be suspended without pay pending receipt of such training.

V. Amendment or Termination of this Policy

This policy may be amended or terminated at any time.

VI. References

Section III-C, "Corporate Integrity Agreement Between the Office of Inspector General of the Department of Health and Human Services and West Virginia

POLICY/PROCEDURE NO.: B-13

Effective date: January 26, 2006

Date(s) of revision: _____

University Medical Corporation, Charleston Division, d/b/a West Virginia
University Physicians of Charleston.”