

**SWMBH Operating Procedure 10.5.1**

<b>Subject:</b> Effective Compliance Education and Training Procedures		<b>Accountability:</b> Compliance	<b>Effective Date:</b> 10/4/2018	Pages: 2	
<b>Overarching Policy:</b> SWMBH 10.5 Effective Compliance Education and Training			Last Reviewed Date:	Past Reviewed Dates:	
<b>LINE OF BUSINESS:</b> <input checked="" type="checkbox"/> Specialty Waiver (B/C) <input checked="" type="checkbox"/> 1115 Waiver <input checked="" type="checkbox"/> Healthy Michigan <input checked="" type="checkbox"/> SUD Medicaid <input checked="" type="checkbox"/> SUD Block Grant <input checked="" type="checkbox"/> MI Health Link <input type="checkbox"/> OTHER: _____		<b>APPLICATION:</b> <input checked="" type="checkbox"/> SWMBH Staff and Ops <input type="checkbox"/> Participant CMHSPs <input type="checkbox"/> SUD Providers <input type="checkbox"/> MH / DD providers <input type="checkbox"/> Other: _____		Last Revised Date:	Past Revised Dates:
Approved: <u>Mila C. Soled</u> Date: <u>10-11-18</u>			Required Reviewer: Chief Compliance & Privacy Officer		

**I. Purpose**

To articulate the procedures that Southwest Michigan Behavioral Health (SMWBH) will follow in ensuring effective education and training pertaining to SWMBH’s compliance program.

**II. Procedural Steps**

**A. Initial/On-boarding Training of Employees.**

SWMBH Employees, interns, and contractors as applicable, will be receive a copy of the SWMBH Code of Conduct and the SWMBH Corporate Compliance Plan, as well as at minimum the following trainings, within thirty (30) days of employment/internship starting/contracting date:

1. Corporate Compliance Training;
2. Privacy & Security Training;
3. Centers for Medicaid and Medicare Services (CMS) Training Module – Combating Medicare Parts C and D Fraud, Waste, and Abuse (FWA) Training;
4. CMS Training Module – Medicare Parts C and D General Compliance Training.

Employees, interns, and/or contractors whose job responsibilities implicate specific risk areas will receive additional role based training(s) as needed.

**B. Annual Training of Employees.**

Annually, SWMBH Employees, interns, and contractors as applicable, will receive a copy of the SWMBH Code of Conduct and the SWMBH Corporate Compliance Plan, as well as at minimum the following trainings:

1. Corporate Compliance Training;
2. Privacy & Security Training;
3. CMS Training Module – Combating Medicare Parts C and D FWA Training;
4. CMS Training Module – Medicare Parts C and D General Compliance Training.

In addition, SWMBH employees, and others as applicable, will receive in-person Compliance training annually.

**C. Initial Training of Board Members.**

SWMBH Board Members will be provided with a copy of the SWMBH Corporate Compliance Plan and the SWMBH Code of Conduct within thirty (30) days of appointment to the SWMBH Board of

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Directors. The SWMBH Chief Compliance Officer or his/her designee will be made available to Board Members at Orientation to review the Compliance material and provide additional information and/or education.

D. **Annual Training of Board Members.**

Annual Compliance Training will be provided to SWMBH Board Members during a regularly scheduled Board meeting. Board Members will be provided with a copy of the SWMBH Code of Conduct annually.

E. **Attestations.**

The SWMBH Program Integrity and Compliance department will secure and retain records of its training of employees, interns, contractors, and/or Board members.

F. **Non-compliance.**

Attendance and participation at SWMBH compliance training programs is a condition of continued employment and failure to do so will result in disciplinary action, up to and including termination.

### III. Definitions

None

### IV. References

A. SWMBH Operating Policy 10.5

### V. Attachments

None