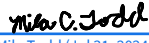




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|---|--|---------------------------------------|
| Section:<br><b>Compliance</b>   | Procedure Name:<br><b>Effective Compliance Education and Training Procedure</b>  | Procedure #:<br><b>10.05.01</b>       |
| Overarching Policy:<br><b>SWMBH 10.05 Effective Compliance Education and Training</b>   |  |                                       |
| Owner:<br><b>Chief Compliance Officer</b>   | Reviewed By:<br><b>Mila C. Todd</b>  | Total Pages:<br><b>4</b>              |
| Required By:<br><input checked="" type="checkbox"/> <b>BBA</b> <input checked="" type="checkbox"/> <b>MDHHS</b> <input type="checkbox"/> <b>NCQA</b><br><input type="checkbox"/> <b>Other (please specify):</b><br>_____  | Final Approval By:<br><br><br><a href="#">Mila Todd (Jul 31, 2024 14:10 EDT)</a>  | Date Approved:<br><b>Jul 31, 2024</b> |
| Application:<br><input checked="" type="checkbox"/> <b>SWMBH Staff/Ops</b><br><input type="checkbox"/> <b>Participant CMHSPs</b><br><input type="checkbox"/> <b>SUD Providers</b><br><input type="checkbox"/> <b>MH/IDD Providers</b><br><input type="checkbox"/> <b>Other (please specify):</b><br>_____ | Line of Business:<br><input checked="" type="checkbox"/> <b>Medicaid</b> <input type="checkbox"/> <b>Other (please specify):</b> _____<br><input checked="" type="checkbox"/> <b>Healthy Michigan</b><br><input checked="" type="checkbox"/> <b>SUD Block Grant</b><br><input checked="" type="checkbox"/> <b>SUD Medicaid</b><br><input checked="" type="checkbox"/> <b>CCBHC</b> | Effective Date:<br><b>10/04/2018</b>  |

**Policy:** The proper education and training of Southwest Michigan Behavioral Health (SWMBH) personnel at all levels is a significant element of the SWMBH compliance program. SWMBH will establish a regular training program consisting of new hire and annual trainings, inclusive of general sessions and of specialized sessions that focus on specific risk areas for personnel whose job responsibilities involve those specific risk areas. The training program will include training on the provisions of the Code of Conduct, Medicare and Medicaid fraud and abuse laws including the Federal False Claims Act and Michigan False Claims Act, applicable MDHHS-PIHP contract standards, as well as the processes for obtaining advice and reporting misconduct.

Attendance and participation at SWMBH training programs is a condition of continued employment and failure to comply with training requirements will result in disciplinary action, including possible termination, when such failure is serious. SWMBH’s compliance department will retain adequate records of its training of employees, including attendance logs and material distributed at training sessions.

**Purpose:** To articulate the procedures that SMWBH will follow in ensuring effective education and training pertaining to SWMBH’s compliance program.

**Scope:** SWMBH PI-C, all SWMBH personnel and Board members.



**Responsibilities:** SWMBH PI-C will ensure training and education is delivered according to this procedure.

SWMBH personnel shall ensure participation in required training and education upon hire and annually thereafter.

**Definitions:** None.

**Procedure:**

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

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 training/education on the following topics, within thirty (30) days of employment/internship starting/contracting date:

1. Corporate Compliance;
2. Fraud, Waste, and Abuse including Federal and State laws and MDHHS-PIHP contract requirements;
3. Privacy & Security, including breach incident reporting; and
4. Any applicable role-based 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.**

1. 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 training/education on the following topics:
  - a. Corporate Compliance;
  - b. Fraud, Waste, and Abuse including Federal and State laws and MDHHS-PIHP contract requirements; and
  - c. Privacy & Security, including breach incident reporting.
2. Annual training may be delivered in a variety of mediums including in-person, synchronous virtual, written materials, video content, etc.

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

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

**References:** SWMBH Operating Policy 10.05

**Attachments:** None.

| Revision # | Revision Date | Revision Location | Revision Summary | Revisor |
|------------|---------------|-------------------|------------------|---------|
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# 10.05.01 Effective Education and Training Procedure

Final Audit Report

2024-07-31

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|-----------------|---|
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| By:             | Paige Pfaff (paige.pfaff@swmbh.org)           |
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## "10.05.01 Effective Education and Training Procedure" History

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