

**SWMBH Operating Policy 10.5**

<b>Subject:</b> Effective Compliance Education and Training		<b>Accountability:</b> Compliance	<b>Effective Date:</b> 1/1/2014	Pages: 2	
<b>REQUIRED BY:</b> <b>BBA Section</b> _____ <b>PIHP Contract Section</b> _____ <b>NCQA/URAC Standard</b> _____ <b>Other</b> _____			Last Reviewed Date: 10/4/18	Past Reviewed Dates: 1/1/14 5/13/16 5/17/17	
<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: 10/4/18	Past Revised Dates: 5/13/16 5/17/17
Approved: <i>Milac Joda</i> Date: <i>10-11-18</i>			Required Reviewer: Chief Compliance & Privacy Officer		

**I. Purpose**

The purpose of this policy is to articulate Southwest Michigan Behavioral Health’s (SWMBH) commitment to education and training of directors and staff as it relates to compliance.

**II. Policy**

The proper education and training of SWMBH’s directors, officers, managers, employees and the ongoing retraining of current personnel at all levels are significant elements of the SWMBH compliance program. Where appropriate, contracted and subcontracted providers, and/or vendors of SWMBH may have the opportunity to participate in its compliance training and educational programs. Minimally, contracted and subcontracted providers will be encouraged to develop their own compliance programs, including effective training consistent with SWMBH’s guidelines that complement SWMBH’s compliance program.

**III. Standards and Guidelines**

To ensure that appropriate information is being disseminated to the correct individuals, SWMBH’s training program will include both general sessions and specialized sessions on specific risk areas. All employees of SWMBH will attend the general sessions on compliance. Employees whose job responsibilities implicate specific risk areas will attend the specialized sessions. SWMBH will establish a regular training program that covers the provisions of the Code of Conduct, as well as the processes for obtaining advice and reporting misconduct. Board members and employees will be scheduled to receive SWMBH’s compliance program training on the Compliance Plan and Code of Conduct at orientation or within thirty (30) days of employment or appointment to the Board. Every employee will be required to sign and date a statement that reflects the employee’s knowledge of, and commitment to the standards of conduct. This attestation will be retained in the employee’s personnel file.

As part of its compliance program, SWMBH will require all employees to attend annual training that emphasizes its commitment to compliance with all Federal and State statutes and requirements, and the policies of Medicaid and Medicare. Annual training will convey a general message about the

## **SWMBH Operating Policy 10.5**

importance of complying with fraud and abuse laws and other ethical areas will be addressed and made part of the training as appropriate. All training materials will be designed to take into consideration the skills, knowledge and experience of the individual trainees.

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.

### **IV. Definitions**

None

### **V. References**

42 CFR, Ch. IV §438.608 and Federal Register Volume 64, No. 219

### **VI. Attachments**

None