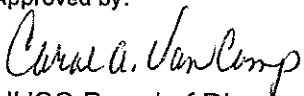


 HAWAII HEALTH SYSTEMS C O R P O R A T I O N "Touching Lives Everyday" POLICY	Quality Through Compliance	Policy No.: CMP 007A
		Revision No.: 1
Subject: Corporate Policy on Education and Training	Issued by: Audit and Compliance Committee	Effective Date: October 13, 2011
	Approved by:  HHSC Board of Directors By: Carol A. Van Camp Its: Secretary/Treasurer	Supersedes Policy: N/A Page: 1 of 2

I. **PURPOSE:** To establish internal standards by which HHSC can ensure that its employees and contractors are sufficiently knowledgeable in matters of legal compliance and thereby minimize the likelihood of compliance violations.

II. **POLICY STATEMENT:** Serious education efforts for employees, medical staff, Board members, volunteers, and contractors lay at the heart of HHSC corporate compliance. HHSC recognizes that most compliance issues result from a misunderstanding or ignorance concerning applicable laws, regulations, and program requirements. HHSC also recognizes that educational efforts must extend throughout the organization to be truly effective in minimizing HHSC's compliance and legal exposure. Accordingly, it is the policy of HHSC to provide employees at all levels and departments with such training as may be necessary and appropriate to ensure material compliance with all applicable laws and regulations, with special attention paid to those which concern the submission of financial claims and HHSC business relationships.

III. DEFINITIONS:

Education and Training: The act or process of imparting or acquiring particular knowledge or skills through any of a number of methods such as classroom, video programs, written materials, web-based training, emails, etc.

IV. POLICY:

- A. HHSC will provide annual education to employees, medical staff, board members, and other agents on the following topics (as appropriate and related to their job duties):
1. the HHSC Compliance program;
 2. fraud and abuse
 3. the development, coding, and submission of claims;
 4. Federal laws related to compliance;
 5. Medicare requirements relating to the admitting/registration process;
 6. consequences to HHSC and to employees for failure to comply with applicable laws; and
 7. medical necessity and documentation requirements.

B. HHSC shall document the training provided to each person.

V. APPLICABILITY: This policy applies to all HHSC employees, medical staff, board members, and other agents.

VI. AUTHORITY: HHSC Compliance Plan (CMP 0001).