

 HAWAII HEALTH SYSTEMS C O R P O R A T I O N "Touching Lives Everyday" PROCEDURES	Quality Through Compliance	Policy No.: CMP 007B
	Issued by: Chief Compliance and Privacy Officer	Revision No.: N/A
Subject: Corporate Policy on Education and Training	Approved by:  Bruce S. Anderson HHSC PCEO	Effective Date: October 13, 2011
		Supersedes Policy: N/A Page: 1 of 3

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

II. **PROCEDURES:**

A. **Guidelines on Educational Topics and Time Allotments:** The following are suggestions for topics and time allotments for various groups. While not prescriptive, the guidelines are provided to ensure that all HHSC employees, medical staff members, Board of Director members, and other contractors receive adequate compliance training.

1. Patient Admitting and Registration Personnel. Not less than two hours annually of training related to one or more of the following subjects: the HHSC Compliance program; fraud and abuse overview, with emphasis on the relationship between the fraud and abuse laws and the development and submission of claims; Medicare requirements relating to the admitting/registration process; and consequences to HHSC and to employees for failure to comply with applicable laws.
2. Physicians and Other Clinical Personnel. Not less than two hours annually of training related to one or more of the following subjects: the HHSC Compliance program; fraud and abuse overview, with emphasis on the relationship between the fraud and abuse laws and the development and submission of claims; Medicare requirements relating to documentation, charge entry, and coding (as applicable); and consequences to HHSC and to employees for failure to comply with applicable laws.
3. Coding Personnel. Not less than four hours annually of training related to one or more of the following subjects: the HHSC Compliance program; fraud and abuse overview, with emphasis on the relationship between the fraud and abuse laws and the development and submission of claims; Medicare requirements relating to the coding of claims; and consequences to HHSC and to employees for failure to comply with applicable laws.

4. Billing Personnel. Not less than four hours annually of training related to one or more of the following subjects: the HHSC Compliance program; fraud and abuse overview, with emphasis on the relationship between the fraud and abuse laws and the development and submission of claims; Medicare requirements relating to the preparation of claims; and consequences to HHSC and to employees for failure to comply with applicable laws.
5. Employees and employees involved in negotiating business relationships with physicians, providers, and vendors on behalf of HHSC: HHSC shall provide the following education to. The training shall include not less than two hours annually of training related to one or more of the following subjects: the HHSC Compliance program; fraud and abuse overview, with emphasis on the anti-kickback and Stark laws; and consequences to HHSC and to employees for failure to comply with applicable laws.
6. Board of Directors: The training shall include not less than two hours annually of training related to one or more of the following subjects: the HHSC Compliance program; State and federal antitrust laws, with particular emphasis on the implications of transactions involving health care providers in rural communities; State and federal laws concerning unfair business practices; and consequences to HHSC and to employees for failure to comply with applicable laws.
7. Business Associates as Outside Vendors, contractors, and agents: All Business Associates (as defined by healthcare law) shall be required to sign a Business Associate Agreement as developed by HHSC and posted on the HHSC website. Such Business Associate Agreement requires that vendors and its employees read and review compliance education and training materials posted on the HHSC website and to comply with all HHSC compliance policies and procedures.

B. Delivery Methods for Education and Training: Training and education can be delivered in a variety of methods such as, but not limited to: in-person, webinars, e-learning programs, PowerPoint presentations, weekly compliance education questions and answers or updates, written materials. Educational activities may include, but need not be limited to: organized programs or classroom sessions, viewing educational videos, intermediary or State sponsored seminars, workshops and similar educational sessions, both onsite and offsite.

C. Documentation: HHSC shall document the training provided to each person. The documentation shall include the following:

- Name and position of employee;
- Date and duration of educational activity or program; and
- Brief description of subject matter of program.

The Chief Compliance and Privacy Officer and Regional Compliance Officers shall periodically review the documentation to ensure that all HHSC employees receive adequate training and education on compliance-related issues.

III. APPLICABILITY: These procedures shall apply to all the committees and positions referenced herein.

IV. REFERENCE: HHSC POLICY CMP 007A.