

	Policy No.: 102	Signature: 	
	Created: 4/2003	Reviewed: 5/2018	Revised: 5/2018

COMPLIANCE EDUCATION AND TRAINING

SCOPE:

All Envision Physician Services colleagues. For purposes of this policy, all references to “colleague” or “colleagues” include temporary, part-time and full-time employees, independent contractors, clinicians, officers and directors.

PURPOSE:

The purpose of this document is to provide guidance for all of Envision Physician Services’ (the “Company) colleagues on the mandatory compliance education and training program.

POLICY/PROCEDURE:

Structure of Compliance Education and Training

The Company is committed to providing ongoing education and training on the Envision Healthcare Code of Business Conduct & Ethics, Compliance Program policies and procedures, coding and billing standards, healthcare laws, federal and state statutes, regulations and guidelines. The following policy is structured to identify education and training requirements for all colleagues, as well as specific education and training requirements for those colleagues and clinicians who participate in the billing and coding process. This includes documentation of medical records. In addition, it outlines the specific education and training requirements for colleagues who participate in the development, management, review and/or approval of “Arrangements” and “Focused Arrangements”.¹ **Part A** relates to guidelines, which must be followed by all non-clinical colleagues of Envision Physician Services and its subsidiaries. **Part B** relates to the New Hire Compliance Orientation program. **Part C** represents those requirements for the professional coding staff of the coding and billing entities. **Part D** defines the education requirements of clinicians and other medical staff who provide services to patients. **Part E** defines the education requirements of colleagues and clinicians who participate in the

¹ As defined by the Corporate Integrity Agreement Envision Healthcare entered into on December 15, 2017.

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development, management, review and/or approval of “Arrangements” and “Focused Arrangements”.

Part A – All Colleagues (“Non-Clinical”)

Envision Physician Services will maintain an information and education program. This program is designed to ensure that each colleague is aware of all-applicable healthcare laws, regulations and standards of business conduct including, but not limited to, Anti-Kickback Statute, Medicare and Medicaid laws. The program will also educate the colleague of consequences to the individual and company that will ensue from any acts of misconduct or violation of laws, regulations, or Envision Physician Services’ policies and procedures. Each colleague shall complete the required annual training on EVHC’s Corporate Compliance Program, EVHC Code of Business Conduct & Ethics, and HIPAA. The training is available online via the Company’s learning management system. Attendance or participation in this education and training course is mandatory and will be tracked electronically. It is the Ethics & Compliance Department and Divisional Management’s responsibility to monitor and ensure that all colleagues meet the education requirement.

Part B – New Hires

Upon hire each newly hired Envision Physician Services colleague receives electronic access to the EVHC Code of Business Conduct & Ethics and the Compliance Program policies.

The colleague must complete the required initial annual training on EVHC’s Corporate Compliance Program, EVHC Code of Business Conduct & Ethics, and HIPAA within 60 days of employment.

Part C - Clinicians

Company has implemented a Compliance Training Program for clinicians. Clinicians must complete education on the CMS documentation guidelines, Medicare and Medicaid rules and regulations, other healthcare laws and regulations, legal sanctions, physician responsibility to follow guidelines and examples of improper documentation and billing practices within 60 days of hire and annually thereafter.

The Compliance Officer will be responsible for designing, planning, providing and/or distributing the educational sessions, or contracting with an outside vendor to perform these duties. The Site Medical Director is responsible for ensuring all clinicians meet the training requirement. Upon completing the training, the physician must pass an educational test to receive credit for the course. The Compliance Officer or designee will monitor and annually audit the participation records for mandatory compliance with this policy.

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Part D - Arrangements and Focus Arrangements Training

Company has implemented a Compliance Training Program for clinicians and non-clinicians who are currently involved in the development, review and/or approval of “Arrangements” and “Focus Arrangements”. Colleagues must complete mandatory education which provides an overview of the Anti-Kickback Statute as it relates to Company’s business. In addition, colleagues must receive adequate training on arrangements that potentially implicate the Anti-Kickback Statute, as well as the regulations and other guidance documents related to the statute. The training will also provide a detailed review of Company’s policies, procedures and other requirements relating to Arrangements and Focused Arrangements, including but not limited to the Focused Arrangements Tracking System, the internal review and approval process, and the tracking of remuneration to and from sources of health care business or referrals. Additional training will be provided on the personal obligation of each individual involved in the development, approval, management or review of Company’s Arrangements to know the applicable legal requirements and Company’s policies and procedures and the legal sanctions under the Anti-Kickback Statute to include examples of violations of the Anti-Kickback Statute.

Ongoing Training

In conjunction with the Compliance Officer, Envision Physician Services management and department heads are responsible for appropriately communicating, documenting and implementing new/revised billing regulations and/or Company policies.

Department Directors and Managers are responsible for disseminating information to colleagues and independent contractors regarding new/revised regulations or policies. Written documentation must be provided to reinforce understanding.

TRAINING CONTENT - COMPLIANCE WITH EVHC'S CORPORATE ETHICS & COMPLIANCE PROGRAM

Colleagues shall be informed during the training session that compliance with the Corporate Ethics & Compliance Program and the Code of Conduct is a condition of employment and that compliance with the Corporate Ethics & Compliance Program and the Code of Conduct is one of the criteria upon which colleagues will be evaluated.

Colleagues also may be required to participate in other mandatory training sessions. These sessions are in addition to those conducted by Ethics & Compliance Personnel pursuant to the Corporate Ethics & Compliance Program.

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Failure to complete a training session conducted pursuant to the Corporate Ethics & Compliance Program shall result in disciplinary procedures, up to and including discharge or termination from employment.

Annually, each employee shall complete a Statement of Understanding which, among other items, certifies that he or she received and completed the general training session and any other training sessions applicable to that employee's position. The Chief Compliance Officer shall keep these certifications on file for at least ten (10) years. The Statement can be completed electronically or via hard copy.

Managers and supervisors are responsible for ensuring adherence to the Corporate Ethics & Compliance Program by colleagues under their supervision. In this regard, it is the responsibility of every manager and/or supervisor to distribute all compliance guidance and revised training materials to every employee promptly upon receipt of the material. They must also inform their subordinates regarding the requirements of, and compliance with, the Corporate Ethics & Compliance Program. Supervisors and Managers are expected to maintain an open line of communication with their colleagues in which concerns can be reported and addressed without fear of retaliation.

Managers and supervisors who fail to meet these requirements or fail to detect non-compliance with applicable policies and legal requirements, where reasonable diligence on the part of the manager or supervisor would have led to the discovery of any problems or violations and given Envision Physician Services an opportunity to correct them earlier, will be subject to disciplinary procedures, up to and including discharge or termination from employment.

POLICY REVIEW

The Ethics & Compliance Department will review and update this Policy and all HIPAA policies when necessary in the normal course of its review of the Corporate Ethics & Compliance Program.