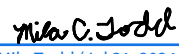




Section: Compliance	Policy Name: Effective Compliance Education and Training	Policy Number: 10.05
Owner: Chief Compliance Officer	Reviewed By: Mila C. Todd	Total Pages: 3
Required By: <input checked="" type="checkbox"/> BBA <input checked="" type="checkbox"/> MDHHS <input type="checkbox"/> NCQA <input type="checkbox"/> Other (please specify): _____	Final Approval By:  <u>Mila Todd (Jul 31, 2024 14:10 EDT)</u>	Date Approved: Jul 31, 2024
Application: <input checked="" type="checkbox"/> SWMBH Staff/Ops <input type="checkbox"/> Participant CMHSPs <input type="checkbox"/> SUD Providers <input type="checkbox"/> MH/IDD Providers <input type="checkbox"/> Other (please specify): _____	Line of Business: <input checked="" type="checkbox"/> Medicaid <input type="checkbox"/> Other (please specify): <input checked="" type="checkbox"/> Healthy Michigan _____ <input checked="" type="checkbox"/> SUD Block Grant <input checked="" type="checkbox"/> SUD Medicaid	Effective Date: 1/1/2014

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: The purpose of this policy is to articulate SWMBH’s commitment to education and training of SWMBH personnel as it relates to compliance.

Scope: SWMBH Program Integrity & Compliance Department; SWMBH personnel (including SWMBH Board Members)

Responsibilities: SWMBH’s Program Integrity & Compliance Department is responsible for developing a compliance education and training program and ensuring its delivery.



SWMBH personnel are responsible for participating in required Compliance training and education.

Definitions: None.

Standards and Guidelines:

- A. SWMBH Board members and employees will be scheduled to receive SWMBH's compliance program training in accordance with Procedure 10.05.01 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.
- B. All employees are required to attend annual training that emphasizes SWMBH's 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 importance of complying with fraud, waste and abuse laws and MDHHS contract standards, and other ethical areas will be addressed and made part of the training as appropriate.
- C. Additional role-specific training will be provided to staff who have access to Care Connect 360, Relias, or other applicable systems, whose job responsibilities necessitate specific compliance-related training, and/or who have been identified by the SWMBH Breach Team as needing to be re-trained on how to best protect PHI.
- D. The SWMBH Board of Directors will receive annual training tailored to the Board of Directors' role in Compliance, including Directors' roles and functions in oversight and reporting.
- E. Training materials will be designed to take into consideration the skills, knowledge and experience of the individual trainees.
- F. 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.
- G. Consistent with MDHHS-PIHP contract requirements, the SWMBH Chief Compliance Officer may not perform their own training and education.

References: 42 CFR §438.608

Federal Register Volume 64, No. 219

Attachments: None.

10.05 Effective Compliance Education and Training

Final Audit Report

2024-07-31

Created:	2024-07-31
By:	Paige Pfaff (paige.pfaff@swmbh.org)
Status:	Signed
Transaction ID:	CBJCHBCAABAA0DoRcK6Fd9R_zLI1-qRbGHD47gfs62-S

"10.05 Effective Compliance Education and Training" History

-  Document created by Paige Pfaff (paige.pfaff@swmbh.org)
2024-07-31 - 6:04:27 PM GMT- IP address: 104.159.231.26
-  Document emailed to Mila Todd (mila.todd@swmbh.org) for signature
2024-07-31 - 6:05:23 PM GMT
-  Email viewed by Mila Todd (mila.todd@swmbh.org)
2024-07-31 - 6:10:05 PM GMT- IP address: 104.47.51.126
-  Document e-signed by Mila Todd (mila.todd@swmbh.org)
Signature Date: 2024-07-31 - 6:10:15 PM GMT - Time Source: server- IP address: 50.124.35.84
-  Agreement completed.
2024-07-31 - 6:10:15 PM GMT