Institutional Compliance Policy and Procedure

Title: Assigning Mandatory Quarterly Training to Residents
Policy Number: 
Reference: BCP 2.2 Training: Annual Education
Effective Date: January 2017

Procedure Statement:

The purpose of this procedure is to outline the objective for scheduling mandatory quarterly resident trainings. The Compliance Executive Associate will work with the Resident Coordinators to complete this task.

Procedure:

1. Every year, the Office of Institutional Compliance will be requesting 10 minute quarterly mandatory training sessions for residents during their weekly meetings. The quarters will run as follows:
   a. 1st Quarter – January through March
   b. 2nd Quarter – April through June
   c. 3rd Quarter – July through September
   d. 4th Quarter – October through December

2. The Compliance AVP/ICO or the Associate Managing Director will present different topics that are covered in the annual compliance training. Topics are listed below.
   a. Vendor Interactions, Conflict of Interest
   b. False Claims Whistleblower Laws
   c. Documentation, Signatures, Coverage Determinations
   d. Government Audits

3. In addition, one makeup session per department will be scheduled after each quarterly training session for those residents who could not attend the first session. Please note that the Compliance AVP/ICO prefers these makeup sessions to be scheduled at the end of the resident meetings or if possible only with the residents that did not attend the first session.

4. The training sessions will run using the following schedule.

<table>
<thead>
<tr>
<th>Qtr</th>
<th>Month</th>
<th>Training Session Title</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>1st</td>
<td>January 2017</td>
<td>Vendor Interactions, Conflict of Interest</td>
<td></td>
</tr>
<tr>
<td></td>
<td>February or March 2017</td>
<td>Vendor Interactions, Conflict of Interest</td>
<td>Make up session for those residents who couldn’t attend the previous session.</td>
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<tr>
<td>2nd</td>
<td>April 2017</td>
<td>False Claims Whistleblower Laws</td>
<td></td>
</tr>
<tr>
<td></td>
<td>May or June 2017</td>
<td>False Claims Whistleblower Laws</td>
<td>Make up session for those residents who couldn’t attend the previous session.</td>
</tr>
<tr>
<td>3rd</td>
<td>July 2017</td>
<td>Documentation, Signatures, Coverage Determinations</td>
<td></td>
</tr>
<tr>
<td></td>
<td>August or September 2017</td>
<td>Documentation, Signatures, Coverage Determinations</td>
<td>Make up session for those residents who couldn’t attend the previous session.</td>
</tr>
<tr>
<td>4th</td>
<td>October 2017</td>
<td>Government Audits</td>
<td></td>
</tr>
<tr>
<td></td>
<td>November or December 2017</td>
<td>Government Audits</td>
<td>Make up session for those residents who couldn’t attend the previous session.</td>
</tr>
</tbody>
</table>

5. In November of each year, the Compliance Executive Associate will begin contacting resident coordinators to schedule resident training sessions for the following year through phone calls and/or emails.
6. Once a training session is scheduled, the Executive Associate will create a training meeting and invite the resident coordinator and Associate Managing Director.

7. The day before the training session, the Executive Associate will send an email reminder to the resident coordinator.

8. After the training session is complete, the Executive Associate will request a listing of the resident meeting sign in sheet to keep track of the residents that completed each training session.

9. The residents that attend all four 10-minute trainings will be given credit for this mandatory training and will not have to take the online ACME training.

10. Each training session will be added to the training and education database.

Review Date:
Revision Date: