

(was Administrative Policy 11-01-040)

Chapter: **DIRECTLY-OPERATED PROGRAM MANAGEMENT**
Title: **TRAINING AND EDUCATION**

Prior Approval Date: N/A
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Approved by:

Donald J. Hablontz 12/6/07
Executive Director Date

I. ABSTRACT

This policy establishes the standards and procedures of the Macomb County Community Mental Health (MCCMH) Board's regular education and training seminars for employees and individual contractors as integral parts of its Corporate Compliance Program.

II. APPLICATION

This policy shall apply to the MCCMH administrative offices and to all directly-operated network providers of the MCCMH Board.

III. POLICY

It is the policy of the MCCMH Board to provide training seminars to its employees and individual contractors to educate them about the Corporate Compliance Program and to stress their duty to report compliance and Code of Ethics violations.

IV. DEFINITIONS

A. None.

V. STANDARDS

A. All employees and individual contractors including all those who are newly hired or contracted, will receive education related to the MCCMH Corporate Compliance Program.

- B. All employees and individual contractors will receive annual refresher training related to the MCCMH Compliance Program.
- C. Employees and individual contractors in identified risk areas (procedure coding and billing for reimbursement, or who process billing claims) will receive more detailed education related to their function and responsibilities.

VI. PROCEDURES

- A. The Compliance Officer shall ensure the development of the compliance education curriculum.
- B. The Compliance Officer shall monitor and ensure that the compliance training and orientation meets the policy standards on this subject.
- C. Initial and refresher compliance education seminars shall include an explanation of the structure and operation of the Corporate Compliance Program. They will introduce the Compliance Officer to the organization.
- D. Initial and refresher compliance education seminars, at a minimum, shall include information on MCCMH Board expectations for reporting problems and concerns and the following Corporate Compliance Program policies:
 - 1. "Code of Ethics"
 - 2. "Reporting Complaints / Non-Retaliation"
 - 3. "Internal Reporting Mechanisms"
 - 4. "Investigations / Disciplinary Actions"
- E. Comprehensive education materials shall be developed to facilitate the compliance sessions and ensure that a consistent message is delivered to all employees and individual contractors. Education protocols and materials must be standardized, so as to evidence that everyone attending a seminar receives the same instruction.
- F. Employees and individual contractors shall be provided with the opportunity to seek clarification or more information on any aspect of the compliance program.
- G. Only properly trained individuals shall be used to provide compliance education and training seminars. Compliance program trainers must be knowledgeable of the:

1. Corporate Compliance Program;
2. Applicable federal laws and regulations;
3. Requirements of the Sentencing Commission Guidelines;
4. Relevant Board policies;
5. Operations of the Corporate Compliance Program; and
6. Content of the MCCMH Code of Ethics

- H. The Compliance Officer shall coordinate with management to ensure that specialized compliance education occurs in identified risk areas.
- I. The Compliance Officer shall also submit periodic reports to the MCCMH Deputy Director and/or designee on all education seminars related to the compliance program.
- J. Annual refresher compliance training seminars may be available to employees and individual contractors in both electronic (e.g. computer, Internet, or video) and face-to-face formats. Employees and individual contractors must attend a face-to-face refresher training minimally every three calendar years.
- K. The Compliance Officer shall maintain adequate records of the training sessions, the attendance records of employees and individual contractors and training material contents.

VII. REFERENCES / LEGAL AUTHORITY

- A. Pub. L. 104-191
- B. MCCMH MCO Policy 1-001 "Overview: Compliance Program / Code of Ethics"

VIII. EXHIBITS

- A. None.