

<b>DEPARTMENT:</b> Reimbursement	<b>POLICY DESCRIPTION:</b> Education and Training
<b>PAGE:</b> 1 of 2	<b>REPLACES POLICY DATED:</b> 4/22/98, 6/19/01, 7/1 06, 1/24/09, 5/15/10
<b>EFFECTIVE DATE:</b> October 1, 2020	<b>REFERENCE NUMBER:</b> RB.014
<b>APPROVED BY:</b> Ethics and Compliance Policy Committee	

<p><b>SCOPE:</b> Reimbursement Department, all Company-affiliated Facilities that file cost reports, and all Corporate Departments involved in the preparation of cost reports for Federal healthcare programs at Company-affiliated Facilities.</p>
<p><b>PURPOSE:</b> To require that Reimbursement Department personnel receive effective and timely education on Federal and State statutes, regulations and guidelines, and Corporate policies. Additionally, to require that an education curriculum be developed, maintained and updated to meet the needs of all Company professional staff involved in third-party payor reimbursement activities.</p>
<p><b>POLICY:</b> All Reimbursement Department professional staff must receive effective and timely education on an annual basis, which includes, but is not limited to, education and training on Federal and/or State statutes, regulations and guidelines, compliance, and Corporate policies, and is in addition to the annual Code of Conduct training. The education curriculum will be developed and/or coordinated through the Managing Director of Education. This curriculum may include:</p> <ol style="list-style-type: none"> <li>1. Internal training and education sessions for major changes in third party law, regulations, policy, or new developments;</li> <li>2. Internal training and education on company and departmental policy and procedures;</li> <li>3. External vendor presentations on relevant reimbursement topics;</li> <li>4. External seminars as approved by the VP or AVPs of Reimbursement;</li> <li>5. Train the Trainer programs and/or materials for instructors; and</li> <li>6. New employee training.</li> </ol> <p>The VP and AVPs of Reimbursement will be responsible for determining the required attendance and participation in the developed curriculum for staff within their area of responsibility, but no less than 8 hours annually.</p>
<p><b>PROCEDURE:</b></p> <ol style="list-style-type: none"> <li>1. Each individual is responsible for planning their educational needs and annually outlining how they will meet the minimum 8-hour requirement. The plan should take into account their normal workload to ensure that the availability exists for them to attend their planned educational activities throughout the year. It is the responsibility of the individual's direct supervisor to ensure that his/her staff is meeting the minimum requirements, and he/she is receiving appropriate and timely education. The individual's ability to plan and meet the educational requirements, along with the direct supervisor's ability to ensure that the staff has met the requirements, will be evaluated as part of the Employee Performance Review process.</li> <li>2. Records of training sessions including materials, agendas, sign-in sheets, etc. will be maintained for a minimum of 5 calendar years after the training occurred.</li> </ol> <p>Reimbursement Department personnel shall meet periodically with the applicable hospital personnel involved in third-party payor reimbursement activities, to educate them on their role in the cost reporting process. These education sessions will focus on accumulating, recording, and reporting compliant third-party payor reimbursement data. Education should also include information on non-</p>

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allowable expenses, accurate cost allocation statistics, required account analyses, and review of related party transactions.

- REFERENCES:**
1. Records Management Policy, [EC.014](#)
  2. OIG Compliance Program Guidelines