

Policies and Procedures - School of Medicine

SECTION: BILLING COMPLIANCE	Approved: 1/13/99	Effective Date: 2/1/99	Revised: 3/9/06
CHAPTER: CORRECTIVE ACTION PLAN	Replaces Policy Revised: 5/27/04		
POLICY: MANDATORY TRAINING	Retired:		
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I. PURPOSE

To establish mandatory training requirements for Creighton Faculty, Residents and staff within the School of Medicine (hereinafter "School of Medicine") who provide health care services and items that are billed under the University's tax identification number to assist them in complying with Creighton's Billing Compliance Plan ("Plan") <http://www.creighton.edu/billingcompliance> , and requirements of government and private payers.

II. POLICY

Faculty, Residents and staff within the clinical departments of the School of Medicine whose services may be billed under the University's tax identification number shall attend the mandatory training sessions established through the Billing Compliance Office as applicable to their position.

III. SCOPE

This policy applies to anyone in the School of Medicine who provides health care services or items billed under the University's tax identification number, including, but not limited to, Contributive Services faculty.

IV. PROCEDURE

A. Initial Orientation

1. New School of Medicine Employees (Staff). New full-time and part-time (benefit eligible) employees in the School of Medicine (including intercampus transfers) shall receive initial orientation to the Compliance Plan from the Billing Compliance Office.
 - a. The Department/School is responsible for ensuring that new employees complete initial orientation and sign a Plan acknowledgment form. The Billing Compliance Office shall track initial orientation and receipt of the signed Plan acknowledgment form.
2. Residents/House Officers. New residents shall receive orientation to the Compliance Program during the mandatory New House Officer orientation

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provided through the GME Office. Residents who are unable to attend New House Officer Orientation shall view the videotape of the orientation session.

- a. The GME Office is responsible for ensuring that all new House Officers complete the initial orientation. The GME Office shall forward any orientation sign in sheets and signed Plan acknowledgment forms to the Billing Compliance Office.
3. Faculty and Non-Physician Providers. All new faculty and non-physician providers who will be billing for services, either directly or indirectly (i.e., "incident to", through Children's Physicians) under Creighton's tax ID number shall meet with the Compliance Director for initial orientation before their billing number will be activated.
 - a. It is the Department/School's responsibility to contact the Billing Compliance Office to arrange for this initial orientation session.
 - b. Either the Department/School or the Compliance Office will provide the new faculty provider with the Compliance Plan and Acknowledgment form. It is the Department's responsibility to make sure that the signed Plan acknowledgment form is sent to the Compliance Office.

B. Initial Training

1. Evaluation and Management Training
 - a. New Faculty and Non-Physician Providers. Where applicable¹, new providers, including non-physician providers shall complete

¹ In some departments as determined by the Compliance Office, E&M training may not be required. In departments, such as Radiology, the Department may obtain a waiver from the Compliance Office for those providers who will not be providing E&M services.

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initial training on documentation of evaluation and management (E/M) services. Until such time as this training is available on-line, the clinical department shall use the current videotape of the **Basic E/M Training** session and handouts for this purpose and obtain a signed acknowledgment of completion. The faculty/non-physician provider must sign a training acknowledgment form or complete the on-line quiz for on-line training. **The provider's audit flag in the IDX practice management system will not be changed to "Y" until this training has been completed.**

- b. New Residents. The GME Office shall ensure that all new residents complete initial compliance training. **Residents who fail to complete this training will be subject to disciplinary action under GME's Policy on Compliance Training.**

2. Medicare's Teaching Physician Rules

- a. New Physician Providers/Faculty. All new physician providers shall complete initial training on Medicare's teaching physician rules as established by the Billing Compliance Office. Until such time as this training is available on-line, the clinical department shall use the current videotape of the **Basic Teaching Physician Rules Training** session and handouts for this purpose and obtain a signed acknowledgment of completion. **The provider's audit flag in the IDX practice management system will not be changed to "Y" until this training has been completed.**
- b. Residents. All new residents receive initial training on Medicare's teaching physician rules during the mandatory orientation session. **Residents who fail to complete this training will be subject to disciplinary action under GME's Policy on Compliance Training.**

C. **Other Training**

1. Yearly Mandatory Provider Training.

- a. Creighton Yearly Compliance Training Sessions. Each clinical department within the School of Medicine shall provide annual mandatory billing compliance training for all physicians, non-

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E. Sanctions

1. Faculty and Providers.
 - a. If a provider fails to comply with the mandatory training requirements by the stated deadline, his/her Creighton Medical Associates (CMA) billing privileges may be suspended until the required training is completed.
 - b. The Department may impose additional sanctions and disciplinary action for providers who do not comply with these mandatory training requirements.
2. Residents.
 - a. Any Resident who fails to comply with the mandatory training requirements shall be subject to disciplinary action according to GME program policies and procedures.
 - b. The Department may impose additional sanctions and disciplinary action for House Officers who do not comply with these mandatory training requirements.
3. Non-Faculty Employees.
 - a. In addition to any applicable sanctions outlined above, non-faculty employees who fail to satisfy the mandatory training requirements set out in this policy shall be subject to disciplinary action in accordance with the University's Progressive Discipline Policy.

V. ADMINISTRATION AND INTERPRETATIONS

Questions regarding this policy may be addressed to the Billing Compliance Office, the Associate Dean for Graduate Medical Education or the Associate Dean, Administration and Finance, School of Medicine.

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VI. AMENDMENTS OR TERMINATION OF THIS POLICY

This policy may be amended or terminated at any time.

Related Policies: Creighton University Graduate Medical Education Compliance Policy for House Staff.