



YOLO COUNTY
ALCOHOL, DRUG AND MENTAL HEALTH DEPARTMENT
POLICY AND PROCEDURES MANUAL

SUBJECT: Compliance Training

POLICY

Education and training is an important component of the Yolo County Alcohol, Drug and Mental Health Department (ADMH) Compliance Program. There are two primary areas for training: Compliance Standards and Coding and Billing. Compliance training has two goals:

- 1) All employees receive periodic training on how to perform their jobs in compliance with the standards of the Compliance Plan and all applicable regulations; and
- 2) Each employee understands that compliance is a condition of continued employment.

Each ADMH employee is expected to be familiar with the Compliance Plan and the appropriate processes necessary to perform his/her duties, and/or how to obtain the requisite information pertinent to performing his/her duties, in a manner consistent with legal, regulatory, and departmental requirements. Employees who act in violation of the Compliance Plan or who otherwise ignore or disregard the standards of ADMH may be subjected to progressive disciplinary action up to and including termination.

PROCEDURE

Training clearly communicates the core components of the Compliance Plan and supporting policies and procedures to all physicians and staff, as well as to independent contractors whose services are billed under the ADMH provider number. Memos, informational notices, E-mail and/or monthly meetings are used to notify staff of changes in policies or procedures.

A. Compliance Standards Training

Training on compliance standards covers the operation and importance of the Compliance Program, the consequences of violating the standards and procedures outlined in the Compliance Plan, and the role of each employee in the implementation of the Compliance Plan.

Compliance standards training will provide information on how to follow the law and will be tailored to the needs of the clinical staff and physicians, case management staff, and support staff.

In addition, training will include several clear examples of noncompliant behavior.

For example, training for the billing staff might include a discussion of how submitting claims based on codes that do not reflect the services actually provided violates the Compliance Plan

and may violate the law.

The Compliance Standards training will also review the *Code of Conduct*. Staff will sign an acknowledgement that they have received training on this material and that they understand the *Code of Conduct*.

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B. Coding and Billing Training

Training on accurately documenting services is an ongoing mission of ADMH. This training includes:

- Coding requirements;
- Claim development and submission practices;
- Signing a form required to be authorized by a physician without the physician's authorization;
- Proper documentation of services rendered;
- Proper billing standards and procedures and submission of accurate bills for services;
- Legal sanctions for submitting deliberately false or reckless billings;
- Ongoing training for staff on policy changes;
- Unit meeting agendas to include discussions of compliance activities and QIC system level issues, when applicable; and
- New staff orientation training including specific discussion and training on compliance issues.

Training Log

The Compliance Officer will maintain a log of all training activities. This log provides information on the date of the training, names of attendees, type and topics of training, location of the training, trainer's name(s), duration of the training, and number of CEUs earned, if applicable.

Staff will sign an acknowledgement that they have received compliance training and that they understand the material. These acknowledgements will be maintained as part of the Training Log.

Training Timelines

New employees are trained as soon as possible after their start date and all employees receive refresher training on an annual basis, or as appropriate.

Ongoing Communication

To regularly communicate new compliance information and to assure that staff receive the most recent information, ADMH has implemented the following communication mechanisms:

- [Policies and Procedures are available to all staff via the intranet.](#)
- Scheduled periodic Compliance trainings.

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REFERENCES

ADMH Code of Conduct

APPROVED BY:

ADMH Director

Date