



POLICY SUBJECT:

EFFECTIVE DATE: 8/12/2011

Compliance Education Policy

*To be reviewed every three years by
Compliance & Ethics Committee*

Compliance Education Policy

POLICY: Sound Physicians requires that all providers having an employment agreement with (Sound “or the Company”) complete training on or before the effective date of the provider’s employment agreement, and thereafter once annually during the term of the provider’s employment agreement.

All Sound Physicians’ employees are required to complete initial compliance training on their first day of employment with Sound Physicians, and also on an annual basis while employed by Sound Physicians.

All Sound Physicians’ employees and providers are required to complete annual compliance training as well as specialized training relating to their position as determined by the Compliance Department.

PURPOSE: To ensure all Sound Physicians’ providers and employees understand and comply with Company policies and procedures by completing initial and annual compliance training.

PROCEDURE:

- I. Exceptions from the policy are granted under the following circumstances:
 - B. Providers and employees who are unable to complete initial or annual training for reasons that would justify an absence under the Family Medical Leave Act may request an exception. Requests must be directed to the Compliance Director. If the Compliance Director approves the request, written approval is provided to the individual. If the individual is not a provider, the individual must complete training on the first day that he or she returns to work. If the individual is a provider, that provider must complete training within 30 days of his or her return to work. The Department or Regional Office must report the provider’s return date to the Compliance Director. However, clinical services provided by the returning provider shall not be billed until compliance training is complete.

- C. Providers and employees may request an exception from the training requirements for special circumstances. Any such request must be in writing, and submitted to the Compliance Director. The Compliance Director may grant a request in his or her sole discretion. If a request is granted, the Compliance Director will provide written notice. If the request is granted, the process for returning to work described in section 2 applies.

- II. Other individuals, including but not limited to consultants and vendors, who provide patient care items or services or who perform billing or coding functions on behalf of Sound Physicians are also required to complete compliance training. Such individuals must complete compliance training on or before the first day of providing services on behalf of Sound Physicians, and also on an annual basis during the term of providing items or services to Sound Physicians.

The Compliance Department maintains documentation of required compliance training activities. When a consultant or vendor is required to complete such training, the consultant or vendor's supervisor or his or her designee is responsible for providing documentation of completed training to the Compliance Department.