



<b>Health Care Agency Mental Health and Recovery Services Policies and Procedures</b>	Section Name:	Human Resources
	Sub Section:	Staff Development
	Section Number:	03.01.02
	Policy Status:	<input type="checkbox"/> New <input checked="" type="checkbox"/> Revised

	SIGNATURE	DATE APPROVED
Director of Operations Mental Health and Recovery Services	<u>Signature on File</u>	<u>2/15/2023</u>

**SUBJECT:** Compliance, Orientation, Education and Training

**PURPOSE:**

To establish a standardized orientation process to current Mental Health and Recovery Services (MHRS) policies and procedures (P&P), applicable law and regulation and compliance issues.

**POLICY:**

All MHRS new employees will be given training and orientation on Policies and Procedures and Compliance Training within the first 30 days of employment.

**SCOPE:**

All MHRS employees except where otherwise specified below.

**REFERENCES:**

[Health Care Agency P&P #VIII-12.06 Compliance Training,](#)

Alcohol and Drug Abuse Services "Staff Training Policy" and "Employee Orientation Regarding Regulatory Mandates"

**PROCEDURE:**

- I. For the purpose of this policy, the term "employee" shall refer to any of the following individuals: employee (part-time, full-time, extra-help, contract, etc.), physician, volunteer, student, student intern, and any unpaid staff.
- II. Within 30 days of beginning employment, the supervisor shall ensure that all MHRS employees receive training on and orientation to all applicable HCA, MHRS, and Divisional and Program policies.
  - A. Training shall include a review of MHRS P&P's and an opportunity to ask questions about the P&P's.

- B. The employee shall sign an attestation that he/she has reviewed the P&P's and has had an opportunity to ask questions.
- III. All new MHRS employees shall receive training on the HCA Compliance Program as established by the HCA Compliance Office.
- A. The HCA Compliance Office shall obtain and maintain certification of completion forms from employees.
  - B. Additional and follow-up training may be required as established by the HCA Compliance Office.
- IV. All new MHRS employees who will participate in providing or billing services through any federally funded program shall take the New or Annual Provider Training that includes training on coding and documentation as established by Authority and Quality Improvement Services (AQIS), within 30 days of beginning employment.
- A. Certification of completion of training forms from employees shall be maintained by AQIS.
  - B. The supervisor shall be responsible to ensure that this training is completed. This training shall include:
    - 1. Fraud & abuse
    - 2. The submission of accurate bills for services rendered to federal health care program patients
    - 3. The personal obligation of each individual involved in the billing process to ensure that such billings are accurate
    - 4. Applicable reimbursement statutes, regulations, and program requirements and directives
    - 5. The legal sanctions for improper billings
    - 6. Examples of proper and improper billing practices
    - 7. Federal health care program requirements governing the licensure and qualifications of individual behavioral health service providers
- V. AQIS shall notify the responsible supervisors on the Notification List when a staff member has not completed the New or Annual Provider Training within the 30 days of being hired.
- VI. If a new employee provides services or participates in processing bills before receiving the New or Annual Provider Training, the employee's work related to coding, documenting, and/or processing the billing information shall be reviewed by the supervisor or designee who has received the training.

- A. In no case shall this extend beyond 30 days after the employee's hire date or after they begin working as a provider of services.