COMPLIANCE EDUCATION AND TRAINING

SCOPE:

All EmCare colleagues. For purposes of this policy, all references to “colleague” or “colleagues” include temporary, part-time and full-time employees, independent contractors, clinicians, officers and directors.

PURPOSE:

The purpose of this document is to provide guidance for all of EmCare’s (the “Company”) officers, directors, employees, and independent contractors on the mandatory compliance education and training program.

POLICY/PROCEDURE:

Structure of Compliance Education and Training

EmCare is committed to providing ongoing education and training on the Envision Healthcare Code of Business Conduct & Ethics, Compliance Program policies and procedures, coding and billing standards, healthcare laws, federal and state statutes, regulations and guidelines. The following policy is structured to identify education and training requirements for all colleagues, as well as specific education and training requirements for those colleagues and clinicians who participate in the billing and coding process. This includes documentation of medical records. Part A relates to guidelines, which must be followed by all non-clinical colleagues of EmCare and its subsidiaries. Part B relates to the New Hire Compliance Orientation program. Part C represents those requirements for the professional coding staff of the coding and billing entities. Part D defines the education requirements of clinicians and other medical staff who provide services to patients.

Part A – All Colleagues (“Non-Clinical”)

EmCare will maintain an information and education program. This program is designed to ensure that each colleague is aware of all-applicable healthcare laws, regulations and standards of business conduct including, but not limited to, Medicare and Medicaid laws. The program will also educate the colleague of consequences to the individual and company that will ensue from any acts of misconduct or violation of laws, regulations, or EmCare’s policies and procedures. Each colleague shall receive at least one (1) hour of initial annual training on EVHC’s Corporate Compliance Program, EVHC Code of Business Conduct & Ethics, and HIPAA. The training is available online via the Company’s learning management system. Attendance or participation in this education and training course will be tracked electronically. It is the Ethics & Compliance
Department and Divisional Management’s responsibility to monitor and ensure that all colleagues meet the education requirement.

**Part B – New Hires**

Upon hire each newly hired EmCare colleague receives electronic access to the EVHC Code of Business Conduct & Ethics and the Compliance Program policies.

The colleague must complete the online training within 60 days of employment.

**Part C – Non – Clinical Coding Staff**

EmCare has implemented a Compliance Training Program for colleagues involved in preparing or submitting Medicare bills on behalf of EmCare or its subsidiaries. Each of these colleagues must complete at least three (3) hours of training per year in the submission of accurate bills to Medicare, Medicaid, and private payors. Such training will also be included in the orientation of non-clinical coding staff colleagues.

It is the Compliance Officer’s responsibility to verify that these educational sessions were conducted and that mandatory attendance was required for all staff associated with the coding process. The Department Managers will maintain a log indicating the course material, course length, attendee name, and date of completion, and forward this log to the Compliance Officer. Those not attending regularly scheduled sessions are required to request individual training sessions to complete this requirement. The Compliance Officer or designee will monitor and annually audit the attendance records to ensure compliance with this policy.

Topics to be covered during these sessions include: updates on billing requirements, documentation guidelines, findings from quality reviews, coding updates, training in the submission of accurate bills for services rendered to Medicare or Medicaid patients, the personal obligation of each individual involved in the billing process to ensure that such billings are accurate, the legal sanctions for improper billings and examples of improper billing practices.

The Coding Department Manager will be responsible for designing, planning, and conducting the educational sessions, or contracting with an outside vendor to perform these duties.

**Ongoing Training**

In conjunction with the Compliance Officer, EmCare management and department heads are responsible for appropriately communicating, documenting and implementing new/revised billing regulations and/or EmCare policies.

Department Directors and Managers are responsible for disseminating information to colleagues and independent contractors regarding new/revised regulations or policies. Written documentation must be provided to reinforce understanding.
Part D - Clinicians

EmCare has implemented a Compliance Training Program for clinicians. Clinicians must complete education on the CMS documentation guidelines, Medicare and Medicaid rules and regulations, other healthcare laws and regulations, legal sanctions, physician responsibility to follow guidelines and examples of improper documentation and billing practices within 60 days of hire and annually thereafter.

The Compliance Officer will be responsible for designing, planning, providing and/or distributing the educational sessions, or contracting with an outside vendor to perform these duties. The Site Medical Director is responsible for ensuring all clinicians meet the training requirement. Upon completing the training, the physician must pass an educational test in order to receive create for the course. The Compliance Officer or designee will monitor and annually audit the participation records for compliance with this policy.