

Policies and Procedures: Mandatory Compliance Training

Section: Compliance
Chapter: Administration
Policy: Mandatory Compliance Training; Enforcement

I. PURPOSE

To establish a policy which enforces the requirement of timely completion of mandatory compliance training for WVU faculty and WVUPC staff as required by federal authorities, contractual compliance obligations and/or by WVUPC's Corporate Compliance Plan.

II. APPLICABILITY

This policy applies to all WVUPC employees, including both WVU faculty and WVUPC staff.

III. POLICY

All employees, including WVU faculty and WVUPC staff, are required to complete mandatory compliance training within thirty (30) days of hire or contract date, within such other times as communicated by the WVUPC Director of Corporate Compliance & Regulatory Affairs, and annually by such deadline(s) as specified by the Compliance Office. Providers and relevant support staff may also be required to undergo supplemental training based upon the results of annual audit activities.

IV. PROCEDURE

1. Initial training for new providers and support staff:
 - a. Access to clinical documentation systems will not be activated for any new provider until WVUPC Human Resources or WVUPC's Director of Corporate Compliance & Regulatory Affairs confirms that all mandatory compliance training has been completed.
 - b. New support staff shall be required to complete all necessary compliance training prior to gaining access to patient information and/or clinical documentation systems, and in all cases no later than thirty (30) days of the date of such staff member's employment. Failure to comply with this requirement may result in temporary suspension without pay pending receipt of such training.

2. Annual renewal training for existing providers and support staff:
 - a. Access to clinical documentation systems may be deactivated for any provider who fails to complete annual renewal training by deadlines established by the Compliance Office and WVUPC Board of Directors.
 - b. Pay may be held for any provider who fails to complete mandatory training by specified deadlines. Support staff who fail to complete renewal training by the annual deadline(s) will be suspended without pay pending receipt of such training.

V. Amendment or Termination of this Policy

This policy may be amended or terminated at any time.