### Policies and Procedures - School of Medicine

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<th>SECTION: BILLING COMPLIANCE</th>
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<td>CHAPTER: CORRECTIVE ACTION PLAN</td>
<td>Replaces Policy Revised: 3/9/06</td>
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<td>POLICY: MANDATORY TRAINING</td>
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### I. PURPOSE

To establish mandatory training requirements for Creighton University faculty, residents, nonphysician practitioners and contractors within the School of Medicine who provide health care services and items that are billed under the University's tax identification number to assist them in complying with the University's Compliance Plan for Health Sciences Billing and Patient Services (the "Plan") and requirements of government and private payers.

### II. POLICY

Faculty, residents and nonphysician practitioners employed by the University within the clinical departments of the School of Medicine whose services may be billed, directly or indirectly, under the University's tax identification number ("Faculty", "Residents" and "NPPs", respectively) shall attend the mandatory training sessions established through the Billing Compliance Office as applicable to their positions. Physicians and nonphysician practitioners employed by the University but whose services are not billed under the University's tax identification number may be required to participate in the training applicable to Faculty and NPPs as determined by the applicable Department in consultation with the Compliance Director. Contracted physician and nonphysician practitioners whose services are billed under the University's tax identification number ("Contracted Providers") shall attend such training as determined necessary by the Compliance Director.

### III. SCOPE

This policy applies to Faculty, Residents, NPPs, Contracted Providers and other physicians and nonphysician practitioners employed by the University.

### IV. PROCEDURE

#### A. Initial Orientation to the Plan

1. **NPPs**. New full-time and part-time NPPs shall receive initial orientation to the Plan from the Billing Compliance Office. The Department to which the NPP is hired is responsible for ensuring that new employees complete initial orientation and sign a Plan acknowledgment form. Attendance at a billing compliance session held by the Billing Compliance Office during the new employee orientation provided by Human Resources will fulfill this requirement. The Billing Compliance Office shall track initial orientation and receipt of the signed Plan acknowledgment form.
2. **Residents.** New Residents shall receive orientation to the Plan during the mandatory New House Officer Orientation provided through the GME Office. Residents who are unable to attend New House Officer Orientation shall view the videotape of the orientation session or participate in online training, as applicable or available. The GME Office is responsible for ensuring that all new Residents complete the initial orientation. The GME Office shall forward any orientation sign in sheets and signed Plan acknowledgment forms to the Billing Compliance Office.

3. **Faculty.** All new Faculty shall meet with the Compliance Director or his/her designee for initial orientation to the Plan before billing numbers will be activated. It is the responsibility of the Department that hires the new Faculty to contact the Billing Compliance Office to arrange for this initial orientation session. The Compliance Director or his/her designee will provide the new Faculty member with a copy of the Plan and obtain the signed Plan acknowledgment form.

4. **Contracted Providers.** Any new Contracted Provider shall meet with the Compliance Director or his/her designee for initial orientation to the Plan before his/her billing number will be activated. It is the responsibility of the Department that contracts with the Contracted Provider to contact the Billing Compliance Office to arrange for this initial orientation session. The Compliance Director or his/her designee will provide the contracted faculty member with a copy of the Plan and obtain the signed Plan acknowledgement form.

**B. Initial Compliance Training**

1. **Evaluation and Management Services ("E/M Services") Training.** As determined applicable by the Billing Compliance Office, new Faculty, NPPs and Contracted Providers shall complete initial training on documentation of E/M Services. The Billing Compliance Office will make such training available online via BlueLine or any successor program. New Residents shall receive training on E/M Services during New House Officer Orientation. The GME Office shall ensure that all new Residents complete initial compliance training.

2. **Teaching Physician Rules.** As determined applicable by the Billing Compliance Office, new Faculty and Contracted Providers who are physicians shall complete initial training on the regulations and rules governing teaching physicians. The Billing Compliance Office will make such training available online via BlueLine or any successor program. New Residents shall receive teaching physician training during New
House Officer Orientation. The GME Office shall ensure that all new Residents complete initial compliance training.

3. Nonphysician Practitioner Training. All NPPs and Contracted Providers who are nonphysician practitioners shall complete initial training on payer requirements for nonphysician practitioners. The Billing Compliance Office will make such training available online via BlueLine or any successor program.

It is the responsibility of the Department that hires new NPPs or Faculty or contracts with a Contracted Provider to notify the Billing Compliance Office of the new employee or contractor. The Department must provide the Billing Compliance Office with the NetID of the NPP, Faculty or Contracted Provider in order for the Billing Compliance Office to enroll the NPP, Faculty or Contracted Provider in online training. Upon enrollment, the Billing Compliance Office shall notify the Department of the training that must be completed by the new NPP, Faculty or Contracted Provider.

C. Annual Compliance Training

1. Mandatory Annual Training. Each clinical Department within the School of Medicine shall provide annual mandatory billing compliance training for all Faculty, NPPs, Residents and Contracted Providers. Such training shall be provided by the Billing Compliance Office or by an entity approved by the Billing Compliance Office. As determined necessary and appropriate by the Compliance Director, the training will include areas of interest to the particular Department, including, but not limited to, new billing codes; new documentation requirements; areas of risk identified in the most recent Office of Inspector General Work Plan and through internal auditing/monitoring activity; and other topics as may be requested by the Department related to billing compliance. The Billing Compliance Office shall present one live training session to each Department annually and post the training session online thereafter. At the discretion of the Compliance Director, the requirement for annual training may be waived for Contracted Providers depending on factors such as nature and frequency of services provided to the University by the Contracted Provider. In addition, at the discretion of the Compliance Director, Departments may provide training to Residents separate from the training provided to Faculty, NPPs and Contracted Providers. Resident physicians who are not employed by the University but who are participating in a joint residency program with the University and another institution are encouraged but not required to attend annual compliance training.
2. **Training from Affiliated Entities/Institutions.** At the discretion of the Compliance Director, Faculty and Contracted Providers may substitute compliance training from University-affiliated entities or institutions to meet their annual mandatory training requirement. In such cases, the Faculty or Contracted Provider must submit a copy of the sign-in sheet and training agenda (or handout) to the Billing Compliance Office for approval. Resident physicians who are not employed by the University but participate in joint residency programs with the University and another institution are expected to participate in the compliance training of the institution that employs him/her. The Compliance Director, at his or her discretion, may request copies of the affiliated institution’s training materials.

**D. Other Required Training Sessions.**

Faculty, NPPs, Residents and Contracted Providers shall attend additional compliance training sessions as required by the Billing Compliance Committee and/or the Compliance Director.

**E. Attendance**

1. **Mandatory Sessions.** Mandatory training sessions must be completed/attended in their entirety to fulfill the mandatory training requirements.

2. **Online Training.** Faculty, NPPs and Contracted Providers (as applicable) who are unable to attend any scheduled live training session (i.e., Department Annual Compliance Training) shall have thirty (30) days from the date the training is available online to complete the training unless an extension has been granted by the Billing Compliance Office. Faculty, NPPs and Contracted Providers (as applicable) shall complete and submit any quiz or other assessment required as part of online training.

**F. Sanctions**

1. **Faculty, NPPs and Contracted Providers.**

   a. Creighton Medical Associates (CMA) shall not activate the billing privileges of a Faculty, NPP or Contracted Provider who fails to complete the initial orientation to the Plan and initial compliance training unless an exception has been granted by the Compliance Director.
b. If Faculty, NPP or a Contracted Provider fails to comply with the mandatory annual compliance training requirement by the stated deadline, his/her CMA billing privileges may be suspended by the Compliance Director until the required training is completed.

c. The Departments may impose additional sanctions and disciplinary action upon Faculty, NPPs and Contracted Providers who do not comply with the training requirements.

2. Residents.

a. Any Resident who fails to comply with the mandatory training requirements shall be subject to disciplinary action according to GME program policies and procedures.

b. The Departments may impose additional sanctions and disciplinary action upon Residents who do not comply with the training requirements.

3. NPPs.

In addition to any applicable sanctions outlined above, NPPs who fail to satisfy the training requirements set forth in this Policy shall be subject to disciplinary action in accordance with the University's Employee Performance and Conduct Policy.

V. ADMINISTRATION AND INTERPRETATIONS

Questions regarding this policy may be addressed to the Billing Compliance Office, the Associate Dean for Graduate Medical Education or the Senior Associate Dean for Clinical Affairs.

VI. AMENDMENTS OR TERMINATION OF THIS POLICY

This policy may be amended or terminated at any time.