

<b>EVMS MEDICAL GROUP</b>		
<b>POLICY: Education and Training Program</b>	<b>DATE: 01-08-1997</b>	
<b>CATEGORY: COMPLIANCE</b>	<b>REVIEWED/ REVISED: April-13</b>	<b>Page 1 of 1</b>

**PURPOSE:** The establishment and implementation of a compliance educational and training program.

**PROCEDURE:** The Compliance Officer shall be responsible for disseminating EVMS Medical Group policies concerning billing and privacy. To accomplish that objective, the Compliance Officer will work with representatives of the Departments and EVMS Medical Group to ensure that there is a systematic and ongoing training program that enhances and maintains awareness of billing and privacy policies among existing staff and that introduces new personnel to EVMS Medical Group billing and privacy policies. All training materials directed to billing and privacy issues will be submitted to the Compliance Officer for review and approval before being used.

Training shall be mandatory for all physicians, other health professionals who bill for their services, billing personnel and all others who have contact with patients or patient information or an impact on the billing process. A system will be developed to document that such training has occurred. Moreover, the Compliance Officer can require that physicians, other health professionals who bill for their services, and/or other EVMS Medical Group personnel attend training sessions on particular issues. The training materials will identify the specific people who should be contacted by physicians or other EVMS Medical Group personnel about billing and privacy questions.

No outside billing or privacy consultant may be retained by any Department without the review and concurrence of the Compliance Officer. If there is a disagreement about the need or appropriateness of seeking such consultation or about the suitability of the proposed consultant, the EVMS Medical Group President shall make the final decision about whether the consultant should be retained.