


<p><b>DEPARTMENT:</b> Compliance</p> <p><b>POLICY TITLE:</b> CMP03 Compliance Education and Training</p>		
<p><b>REVIEWED BY:</b> AZPC Compliance Officer</p>	<p><b>REVIEW DATE:</b> 11/08/2019</p>	<p><b>EFFECTIVE DATE:</b> 12/01/2019</p>
<p><b>APPROVED BY:</b> Compliance Committee</p>	<p><b>APPROVAL DATE:</b> 11/11/2019</p>	

**PURPOSE:**

To ensure that Arizona Priority Care (AZPC) trains all members of their work force on the policies and procedures, with respect to PHI required by the Health Insurance Portability and Accountability (HIPAA) and Health Information Technology for the Economic and Clinical Health (HITECH) Act. Training occurs as necessary and as appropriate for the members of the work force to carry out functions within the covered entity.

To educate employees, FDRs, and other affiliates of Arizona Priority Care on the use and the disclosure of individuals’ protected health information (PHI), and the safeguards put in place to secure individuals’ electronic protected health information (e-PHI).

**POLICY:**

It is AZPC’s policy to ensure that proper education and training is completed for all staff upon hire and annually thereafter. Training is provided to ensure staff is aware, knowledgeable, and comply with applicable regulations, including, but not limited to, regulations related to the HIPAA and HITECH Act.

AZPC also requires training of all contractors, subcontractors, agents and other persons who provide patient care or who perform billing, coding or claims submission functions on behalf of AZPC.

Required training includes the following modules: HIPAA/HITECH, Cyber Security, Fraud, Waste and Abuse, General Compliance/Standards of Conduct, Cultural and Linguistics/Disability Sensitivity, Model of Care, Sexual Harassment, and Injury & Illness Prevention Program (Compliance Training).

**PROCEDURE:**

To comply with above policy, the required Compliance Training will be provided as follows:

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1. Staff will receive training within the orientation period, no later than 90 days after hire/contract, annually, as deemed appropriate by job functionality, and as deemed necessary by AZPC's Compliance Officer and/or Human Resources for disciplinary reasons.
2. Completion of the required trainings require a passing score of 80% or higher on all training quizzes.
3. The quiz following the training is graded automatically. All employees are required to have a signed certificate of completion in their personnel files, acknowledging that they have received and understand the training.
4. Records of all completed Compliance training will be maintained by Human Resources. These records will consist of the following information:
  - a. Dates of training
  - b. Attendance logs
  - c. Topic of training
  - d. Scores
  - e. Signed Certifications
5. Training will consist of various formats including but not limited to:
  - a. Video
  - b. PowerPoint
  - c. On-Line Presentations
  - d. Classroom, etc.

Updates to Training will include:

1. New or upcoming legislation will be introduced during the annual in-service or more frequently as deemed necessary.
2. Training presentations will be modified as needed to meet any regulatory changes or changes in company policies and procedures.

### **Monitoring and Reporting**

Schedule of Reports - To ensure all Heritage employees complete training timely:

Report Name Description: Compliance Training Roster

Report Frequency: Quarterly

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**DEFINITIONS:**

None

**REFERENCES:**

Heritage Provider Network Policies and Programs  
45 CFR § 160, 162 and 164

**APPENDICES:**

None

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**DOCUMENT REVISION LOG**

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