

	SECTION: Compliance	NO: CMP 016
	TITLE: Compliance Education and Training	DISTRIBUTION: Corporate and all Facilities
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Revised:		

Scope:

All Team Members of Summit Behavioral Healthcare, LLC (Summit BHC), including facilities and their employees, independent contractors and professional staff, Summit Board of Managers (Summit BHC Board), and other individuals authorized to act on behalf of Summit BHC.

Purpose:

To establish protocols to educate Team Members at Summit BHC, its subsidiaries and affiliates in their obligations to participate in Summit BHC’s Compliance Program (Compliance Program) education and training to maintain Summit BHC’s commitment to compliance with applicable local, state and federal laws and regulations.

Policy:

Summit BHC is committed to requiring participation in compliance activities as a condition of continued employment. For this purpose, all officers, managers, employees, contractors, and vendors of Summit BHC are required to receive education about Summit BHC’s Compliance Program in order to promote, maintain, and enforce a system of accountability with compliance standards, policies, and procedures.

Procedure:

Compliance Training

All Summit BHC Team Members will receive appropriate compliance training and education. The compliance education and training will, at a minimum, cover the following topics:

1. The Compliance Program objectives;
2. The procedure for reporting complaints regarding alleged fraud, waste, and abuse, including reporting billing concerns;
3. Each person’s responsibility to report all fraud, waste, abuse, and misconduct;
4. Summit BHC’s mechanisms for reporting allegations of fraud, waste, abuse, and misconduct; and

5. That Summit BHC’s reporting mechanisms may be used in good faith, anonymously—to the extent possible subject to any limitations imposed by law and the nature of the investigation—and without fear of retaliation.

Summit BHC Board

The Summit BHC Board has a duty to foster a culture of compliance among Summit BHC officers, managers, and other Team Members.

1. Summit shall provide new members of the Summit BHC Board information and training on Summit BHC’s Compliance Program and Code of Conduct before their first Board meeting. All members of the Summit BHC Board shall be required to receive annual compliance training.

Compliance Department

The Compliance Department has a duty to exercise reasonable diligence in overseeing the compliance function.

1. Summit BHC shall provide new Compliance Department members information and training on the Compliance Program and Code of Conduct and Ethics (the Code) before their first Compliance Department meeting.
2. The Chief Compliance Officer shall provide the Summit BHC Board with periodic reports on Compliance Program activities, at least on a quarterly basis during Board meetings.

Team Members

- 1.0 Summit BHC shall provide a copy of the Code to all new Team Members. After these individuals have received and read the Code, each of them shall sign a Team Member Acknowledgment Form indicating that they have received, read, and understood the contents. By signing the Team Member Acknowledgement Form, each individual agrees to abide by the policies set forth in the Employee Handbook and Code.
- 2.0 All new Team Members shall complete compliance training pertinent to the job that they have been engaged to perform. For example, individuals involved in billing and coding will be trained according to CMP 0019 Accurate Billing & Coding Services Policy. This job-specific compliance training shall be completed within 30 days of hire and may include web-based training and live training during orientation.
- 3.0 Summit BHC shall provide compliance training to Team Members annually or as often as determined by the Chief Compliance Officer in his or her reasonable discretion. Summit BHC will maintain an attendance log and a copy of all materials utilized during each training session. This required compliance training may be incorporated into any mandatory education or training for Team Members.

- 4.0 The Chief Compliance Officer shall be notified of any Team Member who has not completed their Team Member Acknowledgement Form, new-hire training, or annual training. If a Team Member fails to complete the required training, the Team Member may be subject to disciplinary action, up to and including termination.

Contractors and Vendors

Summit BHC shall use its best efforts to ensure that contract language with all contractors and vendors includes an agreement to adhere to the Code and Compliance Program. At the time of contract execution, and if requested, Summit BHC shall provide the contractor or vendor with a copy of the Code and other policies and procedures pertinent to the work that the contractor or vendor has been contracted to perform.

Documentation of Compliance Training

All compliance education provided to officers, managers, and Team Members shall be documented. The Chief Compliance Officer is responsible for establishing appropriate systems of documentation and for reporting on the status of educational efforts to the Compliance Committee.

Corrective Education

Directed corrective education will be instituted on a case-by-case basis when concerns of non-compliance are raised through audits, reports of violations, or other monitoring activities. The Chief Compliance Officer shall be responsible for recommending corrective education, and determining the form and content of that education.