Compliance Course Requirement Matrix

The Office of Compliance & Audit Services (OCAS) is responsible for administering the Compliance training programs. It is the responsibility of DMC workforce members to comply with DMC's training requirements. Workforce members include employees of New York State, University Physicians of Brooklyn (UPB) & the Research Foundation (RF), as well as physicians, allied health professionals, residents, interns, fellows, students, trainees, volunteers, consultants, contractors and subcontractors.

The following is an outline of the web- based Compliance training courses offered and corresponding workforce members required to complete them.

A. HIPAA: This course describes information regarding the Health Insurance Portability and Accountability Act of 1996. HIPAA establishes how we access, share and securely maintain private information. Topics include HIPAA Awareness, the HIPAA Privacy Rule, Electronic Security, Electronic Transactions, the HIPAA Enforcement Rule and the Stimulus Act.

Who must complete HIPAA Training: All of DMC's workforce members are required to complete HIPAA training. Individuals who work in areas with no access or contact to patient information may fulfill their HIPAA training requirement at the Hospital Orientation HIPAA training session or by completing the Awareness only module of the web- based training program.

B. Professional Compliance Training: The program's main focus is on coding and documentation requirements, rules for Physicians at Teaching Hospitals (PATH) and referral guidelines. The course also outlines topics in Fraud Awareness. Specifically, it discusses common types of healthcare fraud, reviews the annual work plan from the Office of the Inspector General, as well as delineates issues related to managed care.

Who must complete Professional Compliance Training: Physicians, Residents, Physician Billing Administrators and Non- Physician Practitioners/Midlevel Providers are required to complete this course. Voluntary physicians who do not bill through the hospital/ practice plan are not required to complete this course.

C. Corporate Compliance Training: This course focuses on the coding and billing rules required for reimbursement in a hospital setting. It also delineates the required elements of an effective compliance program, as well as provides an overview of other hospital risk areas as identified by the Office of the Inspector General.

Who must complete Corporate Compliance Training: All Hospital revenue cycle personnel including all employees in the Admitting, Outpatient Registration, Health Information Management, Quality Management, Case Management/ Utilization Review, Risk Management, Regulatory Affairs, Hospital Finance and Managed Care Departments are required to complete Corporate Compliance training.

D. DRA: This course describes Federal and State laws regarding the submission of false/fraudulent claims; specifically focusing on the Federal False Claims Act. The program explains penalties for false claims as well as whistleblower protections and the process for reporting fraud.

Who must complete DRA Training: All DMC workforce members receive information on DRA compliance. For those individuals who are required to complete either the Professional or Corporate Compliance courses, the DRA training has been incorporated into those programs and does not need to be separately completed.

E. Research Compliance: Conflicts of Interest: This course is designed to provide researchers, support staff and administrative personnel with knowledge about ethical issues and legal requirements with regards to conflicts of interest and research misconduct.

Who must complete Conflicts of Interest training: All Investigators involved in research related activities as well as Research Administration staff must complete this course.

F. Documentation Integrity: This course describes the Federal & State requirements for documentation in a medical record, as well as Joint Commission accreditation standards and DMC specific policies & procedures on the topic. The course discusses practices related to all individuals that document in a patient's record, as well as additional, specific requirements applicable to physicians, residents and allied health professionals. The course covers standard medical record practices, such as creating accurate, complete and timely entries, requirements related to dating, timing and signing entries, procedures for late entries, amendments and corrections, as well as discusses documentation in an electronic health record.

Who must complete Documentation Integrity: All workforce members who document in DMC's medical records are required to take this course. This includes physicians, residents, allied health professionals, nursing services, dietary staff, clinical researchers, pharmacy staff, medical students, social workers and other staff involved in the review and processing of medical record.