

Training & Knowledge Updates

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Policy

- A. It is the policy of the ACO to maintain an effective compliance training program that includes formal, educational sessions conducted by an established training unit; informal training through on-going communications; and, ad hoc training based on identified needs and risks.

Applicability

This policy and procedure applies to all Participants, Providers/Suppliers, and other individuals or entities performing functions or services related to the ACO's activities.

Procedure

A. Compliance Training

1. Compliance training will be performed during ACO orientations, upon hire, and at least annually thereafter.
2. Any changes in rules or regulations will be communicated to the Participants, Providers/Suppliers and other individuals or entities performing functions or services related to the ACO's activities as outlined by Compliance in Compliance Training Memorandums such as the Mandatory Annual Compliance Training for ACOs Memorandum.
3. Such changes in rules or regulations may necessitate additional training, as determined by Compliance or the changes themselves. If necessary, Collaborative Health Systems (CHS) will inform the ACO of such additional training requirements and directions on completing the same.

B. Orientation Seminars

1. The Executive Director (ED), or designee, will determine training needs, dates, and times for the physician offices, and will schedule and conduct training seminars accordingly.
2. The ED, or designee, will be responsible for coordinating and scheduling initial training seminars with ACO partnerships and completing the required training schedule template.
3. The ED, or designee, will be responsible for providing fulfillment requests to the CHS Fulfillment Team for materials (e.g., Provider Handbooks, PowerPoint presentation and CD).
4. Participants and Providers/Suppliers may elect to send one representative from the office to training, and the representative will be responsible for providing training to the group. The ED will be responsible for providing the necessary training materials for the

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office to the assigned representative. The assigned representative will be responsible for the tracking of that training and record maintenance.

5. Seminar Activity
 - a. The trainer (may be a CHS trainer or an office representative) will proceed with the scheduled trainings.
 - b. The trainer will ensure proper documentation is kept to record the training content and participants:
 - i. Sign-In sheet – collect signatures from those in attendance during the seminar using the provided Sign-in Sheet Template.
 - ii. Orientation Checklist – have the office manager or participant physician leader sign off on the Orientation Checklist.
 - iii. Evaluation – the trainer will request completion of the Evaluation Form by attendees of the training.
6. Offices/practices in the ACO will be responsible for ensuring all required individuals complete the training.
7. Post Seminar Training Paperwork:
 - a. The ACO will be responsible for maintaining training records, and may be asked to provide those records to CHS upon request. Records will be kept for a minimum of 10 years.
 - b. The records to maintain include copies of completed sign-in sheets, training schedules, orientation checklists and evaluation forms. The records may be scanned and maintained in online storage.

C. Interactive Online Training

1. CHS will provide online training modules for use by all Participants, Providers/Suppliers, and other individuals or entities performing functions or services related to the ACO's activities (hereinafter referred to as "users") to enhance knowledge of the ACO model, regulatory requirements and compliance.
2. The modules will consist of a presentation of information in a "course" style format and in some cases include a question set at the end to evaluate the user's retained knowledge of the information.
3. Modular training access
 - a. Users of the training modules will initially enter through a portal at the following link: www.CHSACOTraining.com.
 - b. The user will create an account by:
 - i. Providing First Name, Last Name, and E-mail Address;
 - ii. Selecting a User Name and Password;

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- iii. Defining the relevant ACO for the user;
 - iv. Defining the relevant Medical Group for the user; and,
 - v. Defining user level from drop down (Physician, Physician staff, Medical Group/IPA, CHS staff).
- c. Once the account is created, the user may come to this site and complete one or all training modules over time.
4. Modular Courses
- a. Courses will consist of a set of slides that define the course objectives, provide knowledge content and reinforce the subject matter.
 - b. Additional training modules may be added over time to provide updates, clinical topics, or compliance training that will enhance the learner's knowledge.
 - c. Some courses will have question sets at the end of the presentation that will test the retained knowledge of the learner. These question sets will be graded and a passing score provided to ensure consistency and effectiveness in user learning.
5. Online Course Reporting
- a. Reports will be available to the ACO in multiple sorts that provide:
 - i. Users and type of user (Physician, staff, etc.);
 - ii. Completed modules;
 - iii. Compliance test results (on those modules that have them).

D. Ongoing Training & Knowledge Updates

1. The ACO will use multiple methods of ongoing training in order to ensure all Participants, Providers/Suppliers and other individuals or entities performing functions or services related to the ACO's activities have updated knowledge on regulations or changes in regulations, guidelines, procedures, practices and compliance knowledge that relate to the business of the ACO.
2. Methods used to train and update may include mailings, newsletters, e-mail, online webinars, online interactive training modules, seminars, posters or other sources that will assist in maintaining or increasing the knowledge related to the ACO.
3. There may be instances where previous training may be repeated due to reinforcement requirements where corrective action plans are in place.

Reporting

- A. Progress on training will be reported to the Governing Body when appropriate.
- B. An attestation will be provided to Compliance at least annually to confirm completion of all training requirements.

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Related Documentation

- A. 42 CFR §425.300(a)(4)
- B. Mandatory Annual Compliance Training for ACOs Memorandum
- C. Orientation Checklist
- D. Provider Handbook
- E. Sign-In Sheet Template
- F. Training Presentations

Additional Guidance

For questions, Participants and Providers/Suppliers may contact the executive director.

The ACO may consider adding other training processes provided locally to the procedure.