



Compliance Training Policy & Procedure

PURPOSE

To outline the participation requirements for all Bluestone Employees in Ethics and Compliance Training as established in the Compliance Program Policy, to meet or exceed the Office of Inspector General (OIG) guidance for effective compliance training and Corporate Integrity Agreement (CIA) and applicable Federal health care program requirements, including the requirements of 42 U.S.C. § 1320a-7b(b) (the Anti-Kickback Statute) and 42 U.S.C. § 1395nn (the Stark Law).

SCOPE

This policy applies to all *covered persons of Bluestone Physician Services, P.A., Bluestone National, LLC, and Bluestone Physician Services Wisconsin, and its subsidiaries and affiliates, (collectively, Bluestone Physician Services (BPS)).

*Covered persons means: (a) all owners who are natural persons, officers, board members, and employees of Provider; (b) all contractors who furnish patient care items or services or perform billing or coding functions on behalf of Provider; and (c) all physicians and other non-physician practitioners who are members of Provider's active medical staff.

DEFINITIONS

Annual Training: Ethics and Compliance Training and any Specialized Training provided to Bluestone Staff each calendar year.

Employees: For the purpose of this policy, all active Bluestone Employees, Providers, and, as appropriate, contractors, temporary staff, and agents.

Compliance Officer: The compliance leader responsible for compliance program implementation and oversight.

Corporate Integrity Agreement (CIA): The document that outlines the obligations to which Bluestone Physician services agrees as part of a civil settlement with the OIG of the United States Department of Health and Human Services (HHS).

Initial Training: Ethics and Compliance Training and any Specialized Training provided to all new Bluestone staff within the first 30 days of employment/engagement.

Other Required Training: Additional Ethics and Compliance Training required by a regulatory agreement such as a Corporate Integrity Agreement.

Specialized Training: Job-specific training to those staff who work in clinical, coding, billing, and/or referral source arrangements.



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POLICY

Bluestone Physician Services' commitment to ethical and legal conduct creates a responsibility for employees to complete annual compliance education as outlined in this policy. This education will consist of information about BPS expectations for ethical conduct in the workplace and will include, at a minimum, information about:

- The scope of Bluestone's compliance program
- Compliance resources
- Purpose, Focus, Values, and Code of Conduct
- Preventing, detecting and correcting fraud, waste, and abuse; and
- HIPAA Privacy and Security issues

In addition, the Corporate Compliance Department will develop specific compliance education on high risk compliance issues for specific groups of employees. The plan for delivering specific compliance education will be reviewed and approved by the Executive Compliance Committee (ECC) on an annual basis. BPS Corporate Compliance Department develops and maintains the compliance education program and provides support to the departments throughout the year. Each department is responsible for education completion and reporting noncompliance with this policy to Corporate Compliance staff.

PROCEDURE

A. Training Plan

1. The Compliance Officer will coordinate with BPS Human Resources to ensure that a process is established at Bluestone Physician Services Compliance Training.
2. The Executive Compliance Committee shall review the Compliance Training Plan at least annually and update the Training Plan as necessary.

B. Types of Compliance Training

1. New Employee Initial Training

- a. Each new Employee must complete Ethics and Compliance Training, as well as Information Privacy and Security Training, within 30 calendar days of beginning employment using materials provided by the Corporate Ethics and Compliance Department. Certain job functions may be required to complete additional Specialized Training.
- b. The Ethics and Compliance Training will be conducted by the Compliance Officer (CO) or other individual as designated by the Compliance Officer. The training will be offered at least once every 30 days to ensure that each new Employee will have the opportunity to complete the training. The schedule of Ethics and Compliance Training will be made available to Employees.

2. Annual Training



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- a. Each year, Employees must complete updated Ethics and Compliance training. The schedule of Ethics and Compliance Training will be made available to Employees at new employee orientation and through the Learning Management System (LMS). Staff must complete the training by the due date established by the organization, but no later than the end of each calendar year. Annual training typically begins in the fall of each year. Staff who have completed the same courses for New Employee training in the previous 3 months of the due date of annual training will not be required to retake the annual training courses.
3. Board Training
- b. Board Training: Members of the Bluestone Physician Services Board of Directors also required to complete compliance education annually. Bluestone Physician Services Compliance Officer and Chief Executive Officer will determine how this annual education requirement can be met for the board.
 - i. Board Training will include: their responsibilities for corporate governance and review and oversight of the compliance program. The training shall also address the specific responsibilities of health care board members, including the risks, oversight areas, and approaches to conducting effective oversight of a health care entity and shall include a discussion of the OIG's guidance on board member responsibilities.
 - ii. New members of the Board shall receive the training described in this 2.b.i. within 30 days after becoming a member. The Compliance Committee shall review the Board training at least annually and update the Board training as necessary.
 - iii. Compliance officer, in collaboration with CEO, are responsible for ensuring all new Board Members complete compliance training in accordance with the designated completion timeframe of 30 days after becoming a member
3. Training Records: The Human Resources Learning Management Department shall ensure current compliance training records are retained including, training completion status, training materials and records, verifying that the training materials and records have been provided and are accessible to the compliance department, and business leaders.
4. Specialized Training
 - a. Staff performing certain job functions may be required to complete Specialized Training on an annual basis in addition to the Annual Training noted above.
 - b. A new staff member entering or transferring into a job function that requires Specialized Training must complete the required training within 30 calendar days of beginning the job.
 - c. The Specialized Training will be coordinated by the Learning Management System staff.
5. Other Required Training
 - a. To the extent Bluestone is subject to additional regulatory requirements as defined by a regulatory or corporate integrity agreement, Other Required Training may be assigned to Covered Persons as outlined in terms of the agreement.
6. Leave of Absence
 - a. The Compliance Officer will coordinate with Human Resources to address the training requirements for those Employees who are on a Leave of Absence. An Employee on a Leave of



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Absence will normally have 30 days upon return to work to complete any outstanding Ethics and Compliance training requirements, be it annual training or specialized training.

7. Training Completion Responsibility

Supervisors are responsible for ensuring direct reports have completed training. Human Resources shall monitor training completion as part of new hire onboarding requirements. The Compliance officer is responsible for providing compliance training status reports to operational leaders to cascade to supervisors and Human Resource leaders.

C. Enforcement:

All staff whose responsibilities are affected by this policy are expected to be familiar with the basic procedures and responsibilities created by this policy. Failure to comply with this policy will be subject to appropriate performance management pursuant to all applicable policies and procedures, up to and including termination.

APPENDIX (List of LMS Compliance Courses)

All Staff Compliance Training

- [Bluestone Code of Conduct Policy](#)
- [HIPAA Training: Privacy & Security at Bluestone](#)
- [Respect in the Workplace](#)
- [Cultural Competence Training Video](#)
- [Bluestone Physician Services Security Policy](#)
- [Phishing Scam Awareness](#)
- [Annual Compliance Training: Fraud, Waste, and Abuse](#)

The following are for **Clinical staff** at Bluestone:

- [Breaking the Chain of Infection Transmission](#)
- [Bloodborne Pathogens Training](#)
- [Bluestone Tuberculosis Infection Control Plan](#)
- [CDC's Course on TB For Healthcare Workers](#)



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Approval History

Date (MM/YYYY)	Stakeholders	Name/Title
8/9/24	Exec. Compliance Committee	8/9/24 ECC meeting

Revision History

Date (MM/YYYY)	Revisions	Owner/Name/Title	Version
06/2023	Original	Andrea Fuhrmannek-Kloubec, VP Corporate Compliance	1.0
08/2023	Review/Revisions	Andrea Fuhrmannek-Kloubec, VP Corporate Compliance/Brian Holsten, Director of HR	1.1
2/2024	Review/Revision	Nanc MacLeslie, Compliance Dept	1.2
8/9/24	Update CIA Requirements	Andrea Fuhrmannek-Kloubec	1.3

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¹ Prepared at the direction, request, and in furtherance of the purposes of a review organization and any and all information and documentation prepared in furtherance of this policy is confidential and should not be shared outside of Bluestone Physician Services or its Affiliates. Protected under Wis. Stat. 146.38 and Minn. Stat. 145.61et seq. and FL Stat 766.101. The information contained herein is provided for informational purposes only and does not constitute legal, medical, or professional advice. Further, these policies and procedures are subject to change without prior notice, and Bluestone makes no representation to reliance on users of outdated information. Users should check back here for updates regularly.