



ESSENT HEALTHCARE, INC.

Section:	Corporate Compliance	Effective Date:	4/15/05
Subject:	Compliance Training	Revision Date:	4/15/05
Policy #:	CC-19	Review Date:	3/25/08
Responsible Party:	Corporate Compliance Officer	Revision #:	1

Scope:

This policy applies to all workforce members of Essent Healthcare, Inc., (“Essent”).

Purpose:

The purpose of this policy is to outline Essent policy regarding attendance at mandatory compliance training.

Policy:

It is the policy of Essent to require its workforce members to attend periodic, mandatory compliance training.

Procedure:

1. Compliance training will be conducted at each facility periodically as needed to ensure an effective compliance program.
2. Compliance training is mandatory for all workforce members including employed physician office staff and employed physicians.
3. Permanent full-time employees should make every effort to attend training sessions in person during the scheduled times. Full time employees who are unable to attend regularly scheduled sessions must attend a make-up session as soon as possible but no later than 30 days after the completion of the onsite training.
4. Part-time and Per-diem workers should make every effort to attend training in person during the scheduled times. Part-time and per-diem workers who are unable to attend training during the scheduled times must complete a make-up session within 30 days of the end of the onsite training or before providing services to Essent, whichever is *later*.
5. Workforce members who fail to complete the required training within 30 days of the scheduled training date will be suspended from employment until they are able to complete the training or attend a make-up session.



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References:

The Health Insurance Portability and Accountability Act
Essent Code of Conduct
HCCA Compliance Manual
OIG Compliance Guidance