

## Report on Medicare Compliance Volume 31, Number 8. February 28, 2022 Pre-Test May Be Alternative to Refresher Compliance Training

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By Nina Youngstrom

Starting in April, employees of Trinity Health, a national health system based in Livonia, Michigan, will be able to take a pre-test of their compliance knowledge, and if they pass, they can skip the 20-minute annual compliance refresher course.

Although that's a new approach for Trinity Health, Jennifer Munro, manager of integrity & compliance, education, communication and the hotline system, had suggested it before. But she said there were concerns that passing a pre-test may not fulfill the compliance education requirements of an effective compliance program. Then Trinity Health got a new leader who came from a health system with a corporate integrity agreement (CIA). That system's CIA included a pre-test as proof an employee had internalized compliance education, "and the pre-test was deemed sufficient under the CIA," Munro said. "So that was kind of our flag. We can do it now."

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