Code of Conduct: Shared Commitments

Ethics, standards and compliance

UW Medicine NEIGHBORHOOD CLINICS

UW PHYSICIANS NETWORK
Dear UW Physicians Network Colleague,

The true foundation of UW Medicine Neighborhood Clinics (UW Physicians Network) is our commitment to provide high quality care to our patients. As part of this, we strive to ensure an ethical and compassionate approach to healthcare delivery and management.

This Code of Conduct, which we have entitled “Shared Commitments,” provides guidance to ensure that all our work is performed in an ethical and legal manner. It emphasizes the shared common values which guide our actions. It contains resources to help resolve any questions about appropriate conduct in the workplace.

This document will help keep UWPN in full compliance with all applicable laws, regulations, and policies governing our business practices. It will also help us meet the expectations of the U.S. Justice Department and other agencies, as well as the expectations of UWPN’s administration and our board of directors — that we develop and maintain a compliance program to appropriately guide business practices and the delivery of services.

Everyone associated with UWPN is responsible for acting in a manner consistent with our organizational ethics statement, our compliance program, the UWPN and UWP supporting policies, as well as all applicable federal and state laws and regulations.
You are an important contributor to UWPN’s mission to provide high quality, coordinated care. That’s why we ask that you take the time to carefully read and periodically review the material in this booklet. Your adherence to its spirit, as well as its specific provisions, is absolutely critical to our future. You may want to place it in a convenient location so it serves as a handy reference.

Health care practice is a highly regulated industry functioning within and under a myriad of laws, rules, and guidelines that are constantly subject to interpretation. It is our intent to comply with all laws and regulations. The compliance program has been designed to help guide us in our effort to do this.

We know that we can count on you to provide service to others that reflects UWPN’s values and complies with all applicable ethical and legal requirements. Thank you for your commitment.

Sincerely,

Meg Kerrigan, RN, MN, MBA
UWPN Executive Director

Peter M. McGough, MD
UWPN Chief Medical Officer
Why do we need a Code of Conduct?

UWPN has implemented a Compliance Program to help guide all of us in our efforts to comply with laws and regulations related to our workplace, our business practices, and the provision of health care. This Code of Conduct ("Code") was created as a fundamental cornerstone of the UWPN Compliance Program, and serves a variety of purposes. First and foremost, this Code emphasizes the shared common values which guide all of our actions at UWPN. It helps articulate our individual responsibility to abide by all applicable laws, regulations, and policies. It provides guidance to each of us, ensuring that our work is performed in an ethical and legal manner. And lastly, this Code provides resource information for resolving questions or concerns.
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Our Mission Statement

UWPN is a not for profit community-based, physician-led, primary care network. Our principal mission is patient care.

• We provide high quality, coordinated care that is responsive to individual, family, and community needs.
• We actively participate in the University of Washington Academic Medical Center missions of education, research, and clinical care.
• We value integrity, innovation, teamwork, and the sanctity of our relationships with patients.
• We promote professional and personal growth of our practitioners and staff.
• We are committed to being viable financially, while providing compassionate, ethical care to the diverse communities of Puget Sound.

Our Vision and Values

The UW Physicians Network sets the standard for delivering primary health care throughout King County and the Puget Sound region. We lead the way in patient satisfaction, clinical outcomes, and cost-effective care. We are committed to care for patients of all races, cultures, genders, ages, and income levels.

We achieve success by staying true to our core values:

• **Service** — *exceeding the expectations of those we serve:* All UWPN staff and providers, whether they provide direct patient care or support services, play an important role in serving the people who have chosen UWPN for their health care and for their place of employment.

• **Quality in patient care:** By focusing on continually evaluating and improving our services, UWPN ensures the provision of high quality care — as defined by the needs and wants of our patients.

• **Respect for our patients, their families, and our colleagues:** Respect for each other is an essential part of maintaining cooperation and effective teamwork between individuals, clinics, and departments. Respect also means that we value the privacy and confidentiality of our patients — including fellow UWPN staff and providers who are patients in our clinics.
• **Innovation in delivering excellence:** Thinking creatively helps ensure that patient care at UWPN continues to be of the highest quality. Each of us can help keep UWPN at the forefront of health care by thinking of new ways to solve problems and simplify processes.

• **Excellence — always doing our best:** Excellence results from each of us committing to use our intelligence, skills and compassion to do our best, all the time.

## Our Standards of Conduct

### Obey the Law

Every employee must strictly observe all laws and regulatory requirements that apply to the UW Physicians Network. Every employee is expected to be familiar with the basic legal requirements relevant to his or her duties. Employees can learn the laws and regulations through training programs, from supervisors, by reviewing UWPN policies, and by asking questions of the UWPN Corporate Compliance Officer, the UWP Director of Regulatory Compliance, or the UWP Billing Office. Employees are expected to ask supervisors when they require assistance in understanding their legal obligations.

### Keep Accurate Records

Every employee is expected to comply with UWPN and government requirements regarding record keeping. These records include, but are not limited to, medical records, financial records, and human resource records. All records and reports are to be prepared accurately and retained in accordance with applicable requirements.

### Report Information Truthfully

All communications within UWPN/UWP and to outside agencies must be truthful, with appropriate regard for confidentiality.

### Behave Ethically

UWPN has adopted an organizational ethics statement. Every employee is expected to adhere to high ethical standards when he or she acts on behalf of UWPN. Every employee is expected to be loyal to UWPN, to avoid using his or her position for personal gain and to avoid any conflict of interest.

### Maintain Confidentiality

Every employee is expected to follow UWPN policies regarding confidentiality and privacy. UWPN employees must acknowledge
their understanding of the Network privacy and confidentiality policies by signing the UW Medicine Privacy, Confidentiality and Information Security Agreement upon hire and annually thereafter.

Report Possible Violations

Every employee of UWPN has an affirmative obligation to promptly and diligently report suspected violations of federal or state laws or regulations, criminal activity, and any violation of UWPN’s policies, procedures, or code of conduct including the Corporate Compliance Plan. Reporting enables UWPN to investigate potential problems quickly and to take prompt action to resolve them. An employee’s failure to comply with these reporting requirements will result in disciplinary action up to and including termination.

Comply With UWP Compliance Code of Conduct

Every UWP provider who submits a professional fee or other charge for billing by UWP is obligated to observe the standards outlined in the UWP Compliance Code of Conduct.

UWPN and UWP Compliance Resources

Resources

Because our Compliance Program builds on existing resources and processes, we encourage you to use existing programs when appropriate. They include:

- **UWPN Human Resources**.................(206) 520-5510
  (concerns regarding employment conditions, Network employee health and safety, discrimination, sexual harassment, etc.; employees may be referred to Employee Assistance Program resources as listed below)

  UWPN Employee Assistance Program—
The Wellspring Group........................................... (800) 553-7798

  UWP Provider Employee Assistance Program—
  Magellan Behavioral Health............................ (800) 523-5668

- **UWP Human Resources (UWPN Providers)** ..(206) 543-6420
  (provider employment conditions, discrimination, sexual harassment)

- **UWPN Chief Medical Officer** ......................(206) 520-5573
  (medical management of UWPN, quality of care, patient safety, risk management)
• UWPN Privacy Officer .......................... (206) 520-5505
  (privacy and confidentiality policies and regulations, medical records, privacy training requirements and resources)

• UWPN Quality Improvement ................. (206) 520-1533
  (concerns including quality improvement activities, complaint resolution, provider credentialing)

• UWPN Financial Services and Accounting ... (206) 520-5503
  (review of financial operating procedures and practices, enlistment of independent reviews)

• UWPN Executive Director ...................... (206) 520-5509
  (concerns from clinics or administrative offices not appropriately dealt with elsewhere)

• UWPN Compliance Officer ..................... (206) 520-5534
  (questions, concerns or general inquiries about UWPN policies, procedures, or standards of conduct, assistance investigating and resolving ethical concerns)

• UWP Compliance Office ......................... (206) 221-3345
  (billing and coding compliance, UWP standards of conduct, UWP compliance program)

• UWP Coding Help .................. codinghelp@uwp.washington.edu
  (technical questions regarding billing and coding)

• UW Office of the Attorney General ............ (206) 543-9220
  (legal counsel for UWPN providers)

• UW Risk Management ............................ (206) 598-6303
  (risk identification, prevention, and control)

• UWPN Intranet Site ............................... www.uwpn.org
  (policies, procedures, safety information, compliance resources)

**UWPN Compliance Line and Contact Information**

If you are unsure about whom to contact or do not feel comfortable contacting staff in the programs listed above, feel free to call the UWPN Compliance Line at (206) 520-5529, or send mail to the UWPN Compliance Officer, Box 359410, Seattle, WA 98195-9410. Email questions/concerns can also be sent to compliance@uwpn.org.

Providers may also contact the UWP Compliance Line at (206) 221-7080, or send a communication to the UWP Confidential PO Box at CUMG/UWP, PO Box 12709, Seattle, WA 98111.
These resources and telephone lines are available to all employees, physicians, midlevel providers, and students of the UW Physicians Network, and are intended to supplement regular communication channels, such as talking with your supervisor or Human Resources representative. You may call the telephone lines with questions concerning ethical or legal conduct, or to report any action you believe is improper. No employee or provider will experience retaliation or reprisal for filing a complaint, expressing a concern, or asking for advice.

**UWPN Corporate Compliance Officer**

The UW Physicians Network has designated the UWPN Director of Operations as the UWPN Corporate Compliance Officer (CCO). The CCO serves as the individual within UWPN responsible for overall implementation and operation of the compliance program. The CCO can be reached directly at (206) 520-5534.

**Compliance Committee**

The UWPN Compliance Committee, which reports to the UWPN Board of Directors through the CCO, has primary responsibility for developing, implementing, monitoring, and changing the Compliance Program and compliance efforts at UWPN.

**Compliance Leaders**

The UWPN Clinic Chiefs are designated as compliance leaders for their individual clinics. The compliance leaders shall cooperate with the CCO and Compliance Committee in insuring that physicians/midlevels and staff providing services under their direction understand and follow UWPN and UWP policies and procedures with regard to compliance.

**Compliance Guidelines**

The UW Physicians Network is dedicated to the principle that all patients, staff, physicians, midlevel providers, visitors, and students deserve to be treated with dignity, respect, and courtesy.

**Accuracy of Records**

We expect all patient and business records to be accurate and complete, and retained for the periods prescribed by law.

Patient and business records must conform to accepted standards for the maintenance of such records and shall not contain false or misleading information. Medical records may be amended to correct an error or complete documentation only in accordance with estab-
lished policies and procedures. All medical records are documented and maintained according to state regulations and accepted standards.

All financial transactions must be recorded in accordance with generally accepted accounting principles and UWPN and UWP policies and procedures.

**Antitrust Laws**

UWPN complies with all antitrust laws. No matter what pressures exist in today’s health care environment, we must never engage in business practices that could be viewed as competing unfairly.

Antitrust laws are designed to create a level playing field in the marketplace and to promote fair competition. These laws could be violated by discussing UWPN business with a competitor, such as how our prices are set, disclosing the terms of supplier relationships, allocating markets among competitors, or agreeing with a competitor to refuse to deal with a supplier. Our competitors are other health care clinics and facilities in markets where we operate.

In general, avoid discussing sensitive topics with competitors or suppliers, unless you are proceeding with legal advice. You must also not provide any information in response to oral or written inquiry concerning an antitrust matter without first consulting the Executive Director.

**Billing Practices**

UWPN bills only for services actually rendered, and substantiating medical documentation must be provided for all services rendered. If the appropriate documentation has not been provided, it is assumed that the service has not been rendered, and no charge should be submitted or bill generated.

Services rendered must be accurately coded to ensure both proper billing and integrity of the medical record.

All billing must comply with the requirements of the state, federal, and private payors.

UWPN will provide assistance to patients seeking to understand the charges relating to their care. Calls should be directed to UWP Customer Service, or the UWPN Clinic Manager.

If you suspect or have reason to believe that improper billing or documentation is occurring, you should immediately alert your supervisor or higher-level manager. In addition, you may contact the Compliance Line if your questions are not answered or the issue remains a concern.

Billing data must be retained for periods prescribed by law and defined by UWP policy. Staff involved in preparing and/or
submitting charge or billing data must be trained in coding and documentation practices. Billing policies and procedures must be in writing, approved by management and periodically updated.

When a payor agreement requires the collection of co-payments an/or deductible amounts, UWPN will seek collection as required by the agreement. Decisions to waive any co-payment or deductible must be accurately disclosed and implemented in accordance with written policy.

Contracts with clinicians and referral sources must accurately specify the services to be provided, benefits to be received, realistic time commitments, and reasonable compensation rates.

**Commitment to Service**

We provide a uniform standard of care and service throughout the UWPN clinics based upon the needs of our patients. We provide services that are responsive to the health care needs of the populations served and deliver these services in an acceptable manner.

**Confidential and Proprietary Information**

UWPN recognizes the need to maintain patient, personnel, and sensitive management information in a confidential manner. Physicians, midlevels, employees, and students at UWPN have an ethical and legal responsibility to respect the privacy of patients.

Information regarding patients, their care, and their families is strictly confidential and may be shared only between persons directly involved in the patient’s care. Employees shall not obtain or release information about patients unless it is appropriate and necessary to the performance of their job responsibilities. Both written and electronic patient information will be maintained in a controlled, secure, and confidential manner. Never disclose confidential information to an unauthorized person.

Information obtained, developed or produced by UWPN and its employees, and information supplied by outside consultants or vendors for the benefit of UWPN, is considered confidential and/or proprietary. This information should not be disclosed to anyone outside UWPN, including family, friends, relatives, business or social acquaintances, customers, vendors, or others unless you have specific authorization to do so. Do not disclose this information to other UWPN employees except on a “need to know” basis.

Always take reasonable steps to prevent copying or unauthorized use of copyrighted, trademarked, or licensed materials and to safeguard proprietary information entrusted to UWPN.
Conflict of Interest

A conflict of interest exists whenever the loyalty of a UWPN employee or provider is divided between his or her responsibilities to UWPN and an outside interest. A conflict of interest may occur if your outside activities or personal interests influence or appear to influence your ability to make objective decisions in the course of your job responsibilities. A conflict of interest may also exist if the demands of any outside activities hinder or distract you from the performance of your job or cause you to use UWPN resources for other than UWPN purposes.

It is your obligation to ensure that you remain free of any conflict of interest in the performance of your responsibilities at UWPN. If you have any question about whether an outside activity might constitute a conflict of interest, you must obtain the approval of your supervisor before pursuing the activity.

Conflict Resolution

Our goal is to resolve all conflicts fairly, objectively, and as close to the source as possible to obtain a mutually satisfactory resolution.

False Claims Act

The Federal False Claims Act (FCA) is a powerful tool for enforcing federal laws. The FCA prohibits the knowing submission of a false claim for reimbursement. While not specific to health care claims for reimbursement, the federal government often uses the Act to investigate and sanction providers or organizations in cases alleging fraudulent health care billing. Washington State has a law that is very similar to the Federal False Claims Act (RCS 74.09).

Examples of situations that may lead to a False Claim include:

- Unbundling or upcoding
- Billing for a service that was not performed
- Duplicate billing for the same service
- Billing for services without a documented order
- Billing for resident services without appropriate documentation

Both the Federal False Claims Act and Washington State law provide protections against employer retaliation of an employee who reports fraud to the government. Under the FCA, an individual may bring a False Claims suit on behalf of the government. For example, an employee who has reported a concern to their employer and feels the issue has not been taken seriously may ultimately choose to go to the government. If the government recovers money from the provider allegedly committing fraud, that individual may receive a portion of the recovered dollars.
It is especially important that all providers and staff understand the billing rules that apply to their practice or activities. UWPN policies require that any employee who has a compliance question or concern, including one related to coding or billing practices, raise the issue or question with a supervisor, member of UWPN leadership, or the Corporate Compliance Officer so UWPN may investigate and correct inappropriate practices within the organization. UWPN policy prohibits retaliation against anyone who reports a concern in good faith.

**Gifts, Gratuities, and Items of Value**

As employees of a non-profit health care facility, UWPN employees should not solicit or accept gifts, gratuities, or other items of value for themselves, family members, friends, or associates when acceptance could influence — or could reasonably be interpreted by others as influencing — their impartiality as representatives of the Network. Health care providers may not accept any gift from a patient that exceeds courtesy value, and may never accept cash from a patient.

We do not pay for referrals or accept payments for referrals that we make. No payment or other items of value shall be accepted by, or paid to, anyone that would influence the referral of a patient to a particular provider for the provision of health care services or items. Such payments or other items of value would be considered bribes, kickbacks, or inducements and are prohibited.

**Government Investigations**

In some cases, government investigators — or persons presenting themselves as government investigators — may contact employees outside the workplace during non-work hours or at home. Do not feel pressured to talk with the person under such circumstances without first contacting an attorney or the Executive Director. Employees have the legal right to contact legal counsel before responding to questions by an investigator.

The UW Physicians Network cooperates with legally authorized government investigations. If a UWPN employee or provider is approached by a person who identifies himself or herself as a government investigator, the employee should contact the UWPN Executive Director immediately — Phone: (206) 520-5509; Cell: (206) 849-4093. (If the Executive Director is not available contact the Corporate Compliance Officer at Phone: (206) 520-5534; Cell: (206) 790-5576.) Tell the Executive Director that you are calling about a potential government investigation, and s/he will help you follow proper procedures for cooperating with the investigation.
A UWPN employee who receives a subpoena or other written, official governmental request for information (such as a Civil Investigative Demand) should contact the UWPN Executive Director or Corporate Compliance Officer, before responding to the request.

UWPN employees must never:

• destroy or alter any document or record in anticipation of a request for that document or record by a government agency or court;

• lie or make false or misleading statements to any government investigator;

• attempt to persuade any other UWPN employee or any other person to provide false or misleading information to a government investigator, or fail to cooperate with a government investigation.

Hazardous Waste Disposal

UWPN has specific procedures for disposing of medical waste, environmentally sensitive materials, and hazardous material. If you are uncertain of the correct way to dispose of a material, consult your supervisor or manager for assistance.

Improper Use of Funds

UWPN funds may not be used for improper or illegal activities. The Network prohibits any payment to an employee that may be viewed as a bribe, kickback, or inducement — any payment or consideration of value offered in order to influence a decision on grounds not directly related to business merits.

You may not use UWPN funds to contribute to a political party, committee, organization, or candidate in connection with any political campaign for public office. (Note: Personal contributions of your own funds to the campaigns of candidates or ballot initiatives of your choice as a private citizen, unrelated to your UWPN/UWP employment, are not prohibited.)

Marketing and Public Relations

We are honest, accurate, and appropriate when providing information about or marketing UW Physicians Network services. Our objective is to create and increase awareness of our services, stressing their value and our capabilities, always mindful of the trust that the public places in us to provide accurate information. Physicians, midlevels, employees, and students at UWPN have an ethical and legal responsibility to respect the privacy of patients.
Our patients’ and our potential patients’ health is our priority, and we place their good above all other interests.

**Non-retaliation**

No employee or provider will experience retaliation or reprisal for filing a complaint, expressing a concern, or asking for advice. Every UWPN supervisor and manager has a responsibility to create a work environment in which ethical or legal concerns can be raised without fear of retribution or retaliation.

**Patient Care**

We provide impartial access to health care, regardless of race, creed, gender, national origin, sexual orientation, physical impairments, or religious preference. We do not place any conditions on provision of care or otherwise discriminate against an individual based on whether he or she has executed an advanced directive (a legal document which makes an individual’s wishes for treatment known if he or she becomes unable to communicate or make decisions).

We treat all patients with dignity, respect and courtesy. Patients and their families will be involved in decisions regarding their care to the extent that this is practical and possible. We will inform patients about alternatives and the risks associated with the care they are seeking. We will seek to understand and respect their care preferences and objectives.

As health care providers upon whom patients depend, it is important for us to note errors or deficiencies, even those that may seem small or insignificant, in order to improve future care. Promptly report such matters to your supervisor, Quality Improvement, or Risk Management.

We are responsible for providing health care services that comply with all laws, regulations, and standards, including those addressing patients’ rights and those prohibiting romantic or sexual contact with patients.

Qualified individuals must assess the requirements and needs of our patients and identify appropriate services. When appropriate, we will seek input from families, medical staff, and referral and payor sources.

Medical records and documentation must satisfy the requirements of UWPN policy, UWP policy, accreditation standards, and all applicable laws and regulations.

We will provide care only to those patients who can be cared for safely within our facilities. If we cannot provide the appropriate care needed, we will arrange for safe, efficient transport to another medical facility where such care is available.
Protecting UWPN Assets

We are all responsible for protecting and preserving UWPN property, equipment and supplies. UWPN property, owned or leased, includes not only office and medical equipment, vehicles, supplies, reports and records, and computer software and data, but also trademarks and service marks, intellectual property, facilities, and services provided by the Network.

Each of us should also be diligent in protecting and preserving the property of others, including UWPN’s patients, visitors, health care providers and support staff, and students. We should also protect proprietary information entrusted to us by actual and potential vendors.

Follow UWPN policies for proper disposal of surplus or obsolete property.

Use of UWPN Resources

It is the responsibility of each UWPN colleague to preserve our organization’s assets including time, materials, supplies, equipment, and information. Organizational assets are to be maintained for business related purposes. As a general rule, the personal use of any UWPN asset without the prior approval of your supervisor is prohibited. The occasional, minimal use of items such as telephones, copying facilities, or e-mail, where the cost to UWPN is insignificant, is permissible. Any community or charitable use of organization resources must be approved in advance by your supervisor. Any use of organization resources for personal financial gain is prohibited.

Work Environment

The UW Physicians Network is committed to providing a safe and healthy workplace, and to the privacy, security, and comfort of all our patients. If you observe any practice or condition that may not meet UWPN’s policies and procedures or any law, standard, or regulation, promptly report this to your supervisor, manager, or an appropriate UWPN authority.

We expect our employees to uphold all policies, procedures, laws, regulations, standards, and practices intended to make the work environment healthy and safe.

Drugs and pharmaceuticals must be safely stored and inventoried, and any missing supplies must be promptly reported.

Every UWPN supervisor and manager has a responsibility to create a work environment in which legal or ethical concerns can be raised without fear of retribution or retaliation.

UWPN employees and providers are expected to observe the standards of their profession and exercise good judgment. Signifi-
cant differences of opinion in professional judgment should be promptly referred to the supervisor, manager, or appropriate UWPN authority.

UWPN employees and providers are expected to treat one another in a fair and respectful manner. The Network prohibits discrimination on the basis of race, color, religion, gender, sexual orientation, national origin, age, disability, veteran status, or any characteristic protected by law. All employment-related decisions will reflect this commitment.

Each UWPN colleague has the right to work in an environment free of harassment. Degrading or humiliating jokes, slurs, intimidation, or other harassing conduct is not acceptable in our workplace. Any form of sexual harassment is strictly prohibited. This prohibition includes unwelcome sexual advances or requests for sexual favors in conjunction with employment decisions. Moreover, verbal or physical conduct of a sexual nature that interferes with an individual’s work performance or creates an intimidating, hostile, or offensive work environment has no place at UWPN.

Harassment also includes incidents of workplace violence. Workplace violence includes robbery and other commercial crimes, stalking cases, violence directed at the employer, terrorism, and hate crimes committed by current or former employees or providers. As part of our commitment to a safe workplace for our employees and providers, we prohibit colleagues from possessing firearms, other weapons, explosive devices, or other dangerous materials on UWPN premises. Colleagues who observe or experience any form of harassment or violence should report the incident to their supervisor, the Human Resources Department, a member of management, the Corporate Compliance Officer, or the Compliance Line.

Disciplinary Process

Individuals violating any of these standards will be subject to progressive discipline, including termination if warranted. These sanctions will be applied in accordance with relevant UWPN and UWP human resource policies as appropriate.

References

Sources for this booklet include UWPN Policies and Procedures, UWPN Organizational Ethics Statement, UWP Compliance Program, UWP Member’s Guide, and UW Medical Staff Bylaws.
By my signature below I acknowledge that I:

1. Have received and agree to read the UWPN Code of Conduct: Shared Commitments: The “Code”.
2. Will comply fully with the standards contained in this Code and any compliance policies/procedures applicable to my employment.
3. Will report any conduct that I believe to be illegal or to violate this Code or any compliance policies/procedures to my supervisor, the Corporate Compliance Officer or through the Compliance Line.
4. Understand that my failure or refusal to comply with the Code or any compliance policies/procedures will result in disciplinary action.
5. Understand that this Code does not, in any way, constitute an employment contract or an assurance of continued employment.

The UW Physicians Network reserves the right to occasionally amend, modify or update this Code.

EMPLOYEE / PROVIDER NAME (PLEASE PRINT) DATE

EMPLOYEE / PROVIDER SIGNATURE

UWPN CLINIC / DEPARTMENT

JOB TITLE
UW PHYSICIANS NETWORK
Box 359410
Seattle, WA 98195-9410
(206) 329-8976
www.uwmedicine.org/uwpn

Approved by the UWPN Patient Care Committee, December 13, 2000.