UW Medicine
UW Medicine Code of Conduct

PREAMBLE

UW Medicine is committed to the highest levels of excellence and integrity in advancement of its mission to improve the health of the public. Each individual and every entity within UW Medicine embodies excellence and integrity, and contributes to a culture of quality, compliance, safety and ethical business practices. Members of UW Medicine treat everyone with respect, courtesy, dignity and professionalism without discrimination and without regard to race, age, gender, origin, cultural affiliation, sexual orientation and religion.

While this code does not address every issue that may arise, it outlines the basic principles and expectations for every individual in UW Medicine, links to relevant policies and guidance, and provides contact information for making inquiries or reporting concerns.

THE CODE OF CONDUCT

1. Abide by all Laws, Regulations, Policies, Procedures and Standards
   UW Medicine workforce members exhibit conduct that is legal, ethical and in compliance with applicable institutional policies which are designed to implement federal and state laws and regulations. UW Medicine strives to produce clear guidance, but individuals are personally and professionally responsible for understanding and adhering to rules that apply to their specific roles.

2. Prevent Fraud and Abuse
   UW Medicine complies with coding and billing requirements and does not engage in practices that may violate federal and state rules. UW Medicine is committed to the following:
   a. Billing only for services actually rendered and coding services accurately.
   b. Providing timely and complete documentation in the medical record sufficient to support every reimbursement claim.
   c. Preventing inappropriate billing, including:
      • unbundling or upcoding
      • duplicate billing for the same service
      • billing for services without a documented order
      • billing for resident services without a documented teaching physician present when required

   The Fraud, Waste and Abuse Prevention policy (http://depts.washington.edu/comply/docs/COM-008-Fraud_Waste_Abuse_Prevention.pdf) and the False Claims Act governs documentation, coding, billing and accounting for patient care services. Individuals involved in these activities are obligated to understand and apply billing rules, seek guidance as needed and report suspected noncompliance.

3. Promote Ethical Academic, Clinical, Research and Business Conduct
   UW Medicine maintains the highest ethical standards for the conduct of its academic, clinical, research and business affairs. All individuals in the enterprise shall:
   a. Exercise personal accountability and integrity in their work and in their relationships with students, patients, research participants, vendors and the public.
   b. Conduct ethical and responsible research with regard for the well-being and rights of study participants.
   c. Make decisions based on the best interests of patients.
4. **Protect Patient Privacy**

UW Medicine has specific responsibilities to protect patient confidentiality and ensure the privacy and security of protected health information (PHI). All members of UW Medicine share the following accountabilities:

a. Access, use and disclose only the minimum PHI necessary to perform authorized job duties.

b. Understand and comply with institutional policies governing PHI, including those that provide patients with specific rights.

C. Report all concerns about the access, use or disclosure of PHI.

5. **Practice Data Stewardship**

Every UW Medicine workforce member is personally and professionally responsible for practicing data stewardship. This obligation begins with taking all measures necessary to ensure the physical and electronic security of any information used or acquired in the performance of assigned duties, regardless of its form, location or method of transmission, even after separation from UW Medicine.

UW Medicine is committed to protecting the confidentiality of all sensitive information, including patient, restricted, proprietary, research and student information. Workforce members who are given access to sensitive information are personally and professionally responsible for the following:

a. Understanding the policies that apply to specific types of information and seeking clarification when questions about requirements arise.

b. Accessing, using and disclosing sensitive information only as allowed by job duties and in accordance with the standards established for each type of data.

c. Properly disposing of confidential information.

d. Reporting all concerns about the confidentiality and stewardship of sensitive information.

e. Safeguarding against the unauthorized use of UW Medicine proprietary information, including copyrighted, trademarked or licensed materials.

f. Utilizing approved email domains for transmitting sensitive information.

The use of electronic devices and telecommunication networks that store or transmit sensitive information require UW Medicine workforce members to:

a. Protect job-related accounts, access privileges and passwords from use by unauthorized persons, recognizing that individuals are held accountable for any access used with their credentials.

b. Create strong passwords and change them every 120 days, or as required by security standards.

c. Store and transmit electronic PHI and otherwise sensitive information only on secured systems and encrypted devices.

D. Report all suspected security violations, including phishing, malware and other types of security events that could compromise UW Medicine information.

e. Practice safe computing and implement safeguards to prevent information security breaches.

6. **Conserve UW Medicine Resources and Assets**

UW Medicine assets, including budgets, equipment, human resources, facilities, and technologies are entrusted to individuals during the course of their work and must be used responsibly and appropriately. UW Medicine is a complex organization – some individuals are governed by Washington State ethics law, and others are governed by entity-specific policies regarding the use of resources and assets. All individuals must understand the restrictions and responsibilities relevant to their specific role and site of service, and must seek clarification if they have questions.

7. **Demonstrate Professionalism**

Professionalism is demonstrated in many ways, but specifically includes the integrity, respect, compassion, accountability and commitment to altruism that is brought to the performance of work and interactions with others in UW Medicine.

All individuals, regardless of the role they play, are expected to communicate in a professional and respectful manner with patients and their families, research participants, coworkers, supervisors, subordinates, students, trainees, members of the public and others with whom they deal. This expectation requires that UW Medicine workforce members
understand and apply the professional standards unique to their role and function, including those described in the UW Professional Conduct Policy (http://www.uwmedicine.org/about/policies/professional-conduct), in medical staff bylaws, and other entity and role-specific professionalism policies. In all cases, individuals are expected to exercise sound professional judgment in accordance with the principles of this code, and to seek clarification if needed.

8. Avoid Potential and Actual Conflicts of Interest
Individuals in UW Medicine may be exposed to situations that present potential or actual conflicts of interest. While the specific requirements for disclosing and managing conflicts of interest are provided in policies, guidance documents, and established procedures for each constituent group, individuals must adhere to the following basic principles:

a. Avoid situations that may constitute a conflict of interest, including but not limited to:
   • conducting UW business with firms in which an individual or their family member has a direct or indirect interest
   • using UW resources for personal business activities
   • soliciting or accepting gifts from patients or vendors
   • accepting payments that may be viewed as a bribe, kickback or inducement

b. Acquire the appropriate approvals for any outside work performed.

9. Maintain Accurate and Timely Records
All members of UW Medicine maintain accurate and timely records, recognizing the importance of documentation in the provision of healthcare, the performance of academic and research activities, and the administration of financial and business affairs. Specifically,

a. Individuals who work with patient health records must understand specific documentation requirements, comply with timely documentation standards established by medical staff bylaws, and amend records in accordance with established institutional procedures.

b. All financial transactions must be in accordance with generally accepted accounting principles and UW Medicine requirements as established by the chief financial officer.

c. Individuals will abide by applicable records management, retention and destruction requirements as established by the University of Washington (UW) and UW Medicine Records Retention Policies.

10. Provide the Highest Quality of Care
UW Medicine workforce members provide the highest quality, safest, medically necessary, and most effective, efficient care to patients. Patients and their families are treated with utmost compassion and respect. All care is provided in accordance with UW Medicine’s Emergency Medical Treatment and Active Labor Act (EMTALA) policy, as well as the clinical standards established for each healthcare entity within UW Medicine.

POLICIES AND GUIDANCE

Enterprise compliance policies, general policies and guidance can be found at the UW Medicine Compliance web site: http://depts.washington.edu/comply/resources/. The site is searchable and includes links to content-specific policies, entity-based policies, and additional standards of conduct that apply to certain constituents.

CONTACT INFORMATION FOR INQUIRIES AND CONCERNS

Seek assistance and report any concerns or potential violations of this Code of Conduct to:

Compliance Anonymous Hotline: 206.616.5248 (local) or 866.964.7744 (toll free)

UW Medicine Compliance
Main telephone line: 206.543.3098 (local) or 855.211.6193 (toll free)    Fax: 206.221.5172
Email: comply@uw.edu    Address: 850 Republican Street, Building C, Box 358049, Seattle, WA 98195-8049
Website: http://depts.washington.edu/comply/
UW Physicians (UWP) Compliance Department  
Main telephone line: 206.221.3345

Children’s University Medical Group (CUMG) Compliance Program  
Main telephone line: 206.987.8486

ATTESTATION

By my signature below, I attest that I have read the UW Medicine Code of Conduct and had an opportunity to ask questions about its content.

- I understand that I must personally comply with the code of conduct, as well as, federal and state law.
- I understand that I must know and understand the policies that apply to my job.
- I understand that I must report any potential violations of this Code of Conduct or UW Medicine compliance policies to an appropriate enterprise official, including my supervisor or one of the offices listed in this Code.

Name (please print) ________________________________________________________________

Signature________________________________________________________________________

Date________________________ Department _______________________________________

After signing this form, please give it to your supervisor. Signed forms are kept in your personnel file.