Applicability: UW Medicine¹ and UW Medicine Affiliated Covered Entity²

Policy Title: Compliance Policy Development

Policy Number: COMP.001

Superseded Policies: N/A

Date Established: October 11, 2017

Date Effective: October 11, 2017

Next Review Date: October 11, 2020

PURPOSE
Compliance policies may be enterprise-wide, entity-specific, or have otherwise limited scope. This policy articulates the purpose of compliance policies and establishes the minimum requirements for their development, approval and maintenance throughout the enterprise.

This policy applies to all UW Medicine and UW Medicine Affiliated Covered Entity (UW Medicine ACE) compliance departments.

DEFINITIONS
See UW Medicine Compliance Glossary.

POLICY
Compliance policies are designed by subject matter experts to reflect the legal, regulatory and organizational requirements that must be followed by workforce members.

- Policies that apply to all members and entities of UW Medicine enterprise, including the UW Medicine ACE for purposes of HIPAA compliance, are developed and managed through the office of the Chief Compliance Officer/Associate Vice President for Medical Affairs (CCO/AVPMA).

¹ UW Medicine refers to the eight UW Medicine entities: Harborview Medical Center (HMC), Northwest Hospital & Medical Center (NWHMC), Valley Medical Center (VMC), UW Medical Center (UWMC), UW Neighborhood Clinics (UWNC), UW Physicians (UWP), UW School of Medicine (UW SoM), and Airlift Northwest (ALNW).

² The University of Washington (UW) is a hybrid covered entity under the Health Insurance Portability and Accountability Act of 1996 (HIPAA), comprised of healthcare and non-healthcare components. For the purposes of HIPAA, the UW has designated healthcare components, and further designates a group of healthcare components to be one affiliated covered entity known as UW Medicine Affiliated Covered Entity (UW Medicine ACE). Healthcare components of the UW Medicine ACE are represented in 101.G1 University of Washington (UW) HIPAA Designation – UW Medicine – Affiliated Covered Entity.
• Policies with less than enterprise-wide application are developed and managed by the compliance official with related scope and jurisdiction, and undergo separate approval and implementation processes.
• All compliance policy planning is coordinated through the UW Medicine senior leadership team to avoid duplication and/or conflicts.

Requirements
All compliance policies:

• Are in writing, maintained in an easily accessible central location and include the following minimum information:
  o Relevant regulation(s);
  o Policy owner;
  o Key dates (effective date, next date of review, etc.);
  o Links to companion policies, guidance documents, related standards and implementation procedures; and
  o Roles and responsibilities associated with the policy when appropriate.
• Have an official owner who has specific scope and jurisdiction authority for the subject matter.
• Are authored by appropriate subject matter experts in consultation with legal counsel.
• Undergo a comprehensive and documented review process that provides stakeholders and leaders with a rationale for the policy, the plan for its dissemination and required education and/or outreach.
• Are approved by an appropriate governance body, signed and dated by the UW Medicine Chief Executive Officer or official designee, and undergo a full review at least every three years (and additionally as needed to reflect regulatory changes or new risks).

All new policies and material changes to existing policies are disseminated in a timely manner to affected UW Medicine and UW Medicine ACE workforce members, posted on the UW Medicine Compliance website, and when necessary, reflected in the Notice of Privacy Practices.

Document Retention
All official records, including superseded policies, are retained in accordance with applicable records retention policies.

REGULATORY/LEGISLATION/REFERENCES
• Employee Education About False Claims Recovery, Deficit Reduction Act of 2005 § 6032 (codified at 42 U.S.C. § 1396a(a)(68)).
• General Rules, 45 C.F.R. §164.502(j).
• Administrative Requirements, 45 C.F.R. §164.530.
PROCEDURE ADDENDUM(s) REFERENCES/LINKS

- UW Medicine Compliance Glossary
- UWP, C-005 Compliance Policy Development and Implementation

APPROVALS

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Sue Clausen,        Date
Chief Compliance Officer, UW Medicine
Associate Vice President for Medical Affairs, UW