Applicability: UW Medicine\(^1\) and UW Medicine Affiliated Covered Entity\(^2\)

Policy Title: Compliance Education and Training

Policy Number: COMP.002

Superseded Policies: PP04 Privacy, Confidentiality, and Information Security Training
HMC, 135.5 Compliance Education and Training
UWMC, 15-1 Employee Education and Training
UWNC, Comp004 Compliance Education and Training
VMC, Corporate Compliance Training Documentation

Date Established: October 11, 2017

Date Effective: September 21, 2018

Next Review Date: October 11, 2020

PURPOSE
This policy establishes the healthcare compliance training requirements for UW Medicine workforce members and any entity that performs covered functions on behalf of UW Medicine.

For purposes of this policy, healthcare compliance includes content areas that are within the scope of the UW Medicine Compliance Program. This policy does not address other compliance training requirements outside the scope of the UW Medicine Compliance Program.

DEFINITIONS
See UW Medicine Compliance Glossary.

POLICY
UW Medicine develops and implements healthcare compliance education and training, as required by law, regulatory changes, industry needs and trends observed through risk assessments, auditing and investigations.

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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 101G1 University of Washington (UW) HIPAA Designation – UW Medicine – Affiliated Covered Entity.
Compliance department(s) develop annual training plans, document and monitor training completion, and report regularly to senior leaders. Departments throughout the enterprise provide additional healthcare compliance training to operationalize healthcare compliance policies.

I. Healthcare Compliance Training Requirements

<table>
<thead>
<tr>
<th>Training Type/Frequency</th>
<th>Audience</th>
<th>Content Owner</th>
<th>Content</th>
</tr>
</thead>
<tbody>
<tr>
<td>Initial onboarding upon hire or time of engagement (within 30 days of hire or engagement)</td>
<td>Workforce who perform covered functions</td>
<td>UW Medicine compliance departments</td>
<td>Includes but is not limited to general education and awareness about the following areas: • Clinical billing and coding. • Clinical research billing. • Centers for Medicare &amp; Medicaid Services (CMS) General Compliance Training. • Fraud, Waste and Abuse (FWA) awareness and prevention. • Emergency Medical Treatment &amp; Labor Act (EMTALA). • Anti-Kickback Statute (AKS) and Stark law. • Conflicts of interest. • Ethics. • HIPAA and state patient information privacy and security.</td>
</tr>
<tr>
<td>Job-driven onboarding (within 60 days of hire or engagement)</td>
<td>Role-based</td>
<td>UW Medicine compliance departments</td>
<td></td>
</tr>
<tr>
<td>Department-driven onboarding (within 60 days of hire or engagement)</td>
<td>Role-based by department</td>
<td>Enterprise departments and units</td>
<td></td>
</tr>
<tr>
<td>Refresher training (annual)</td>
<td>Workforce who perform covered functions</td>
<td>UW Medicine compliance departments</td>
<td>Refresher Training reinforces and expands upon content received at onboarding as well as new or revised policy requirements.</td>
</tr>
<tr>
<td>Department-driven training (ongoing)</td>
<td>Role-based by department</td>
<td>Enterprise departments and units</td>
<td>Department-driven content includes education and awareness about procedures and practices required to implement healthcare compliance policies.</td>
</tr>
<tr>
<td>Ad hoc (as needed)</td>
<td>Ad hoc/role-based</td>
<td>UW Medicine, compliance departments</td>
<td>See II.</td>
</tr>
</tbody>
</table>

3 Business associates and other individuals and businesses who perform covered functions for or on behalf of UW Medicine and the UW Medicine ACE shall be responsible for healthcare compliance training sufficient to comply with healthcare compliance laws, regulations and UW Medicine policies. Obligations and responsibilities are outlined in their respective contracts, business associate agreements and/or other applicable agreements and UW Medicine policies including COMP.106 Use & Disclosure of Protected Health Information by Business Associates.
II. Triggers for Additional Compliance Education, Training and Outreach.

1. **Job Changes.** A role, duty or position change may trigger additional role or department-specific healthcare compliance training; training completion may be mandated by a specific date or within a certain number of days after the change.

2. **Regulatory and Policy Changes/Trends.** Ongoing or ad hoc education and outreach is provided in response to or in preparation for developments in the legal and regulatory environment, enterprise risk levels, and institutional policies/procedures, as well as general trends in healthcare compliance.

3. **Audit Results and Investigations.** Additional education and training may be required or recommended in response to compliance audit results and/or trends, and the outcome of compliance investigations.

III. Documentation Requirements

<table>
<thead>
<tr>
<th>Document Type</th>
<th>Responsible Party</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Training documentation.</strong></td>
<td><strong>Onboarding documentation.</strong></td>
</tr>
<tr>
<td>All healthcare compliance education</td>
<td>Where maintained in hard copy, by Department of hire or engagement, or designee.</td>
</tr>
<tr>
<td>and training documentation and</td>
<td>Where maintained in learning management systems (LMS), by the owner/operator of</td>
</tr>
<tr>
<td>records of attendance and completion.</td>
<td>the specific LMS system.</td>
</tr>
<tr>
<td><strong>Role-based documentation.</strong></td>
<td>Where maintained in hard copy, by Department of hire or engagement, or designee.</td>
</tr>
<tr>
<td><strong>Unit specific documentation.</strong></td>
<td>Where maintained in LMS, by the owner/operator of the specific LMS system.</td>
</tr>
<tr>
<td>**Privacy, Confidentiality and</td>
<td>Department, in accordance with entity-specific records retention policies.</td>
</tr>
<tr>
<td>Information Security Agreement</td>
<td><strong>Department.</strong></td>
</tr>
<tr>
<td>(PCISA).</td>
<td>OR</td>
</tr>
<tr>
<td>Signed copies of the PCISA, including</td>
<td>Human Resources.</td>
</tr>
<tr>
<td>those attained as digital signatures</td>
<td></td>
</tr>
<tr>
<td>in learning management systems.</td>
<td></td>
</tr>
</tbody>
</table>
**Code of Conduct.** Signed copies of the code of conduct.

<table>
<thead>
<tr>
<th>Training materials. All original healthcare compliance training materials.</th>
<th>Onboarding materials.</th>
<th>Compliance department(s).</th>
</tr>
</thead>
<tbody>
<tr>
<td>Role-based materials.</td>
<td>Compliance department(s).</td>
<td></td>
</tr>
<tr>
<td>Unit specific materials.</td>
<td>Department(s) of hire or engagement.</td>
<td></td>
</tr>
</tbody>
</table>

**REGULATORY/LEGISLATION/REFERENCES**

- General Provisions, 42 C.F.R. §422.503.
- Washington State Ethics in Public Service Act, Revised Code of Washington 42.52.365 Executive branch agencies—Ethics advisors—Ethics training.

**PROCEDURE ADDENDUM(s) REFERENCES/LINKS**
• **UW Medicine Compliance Glossary.**
• **002.F1 UW Medicine Privacy, Confidentiality and Information Security Agreement (PCISA).**
• **002.F2 UW Medicine Protecting Patient Information Self Study.**
• **COMP.201 Fraud, Waste and Abuse Prevention.**
• **UWP, A-03 Employee Training and Development.**
• **UW Medicine Required Compliance Training.**
• **UW Medicine Records Retention Schedule.**

**ROLES AND RESPONSIBILITIES**

**Compliance department(s):**
- Develop and distribute healthcare compliance education, training and outreach modules and materials for certain onboarding and role-based healthcare compliance training;
- Update and maintain healthcare compliance education, training and outreach materials in accordance with legal and regulatory updates, industry trends and observations of auditing, investigations and risk assessment.

**Managers and Supervisors:**
- Responsible to ensure assignment and completion of direct reports onboarding and role-based training;
- Responsible to identify gaps in compliance training for direct reports undergoing role, duty or position changes;
- Develop and maintain department and unit-specific procedures in support of introductory and role-based healthcare compliance training;
- Ensure workforce members and individuals who perform covered functions sign the UW Medicine PCISA upon hire or engagement and annually, and maintain these as required;
- Convey healthcare compliance training goals and expectations; and
- Facilitate understanding of compliance issues and direct questions, as needed, to compliance departments.

**UW Medicine leadership:**
- Champion education, training and outreach activities and convey implementation expectations to operational areas.

**Workforce members and individuals who perform covered functions:**
- Complete all applicable onboarding, role-specific, unit-specific and annual refresher trainings.
- Acknowledge and sign for the receipt, review and understanding of entity-specific code of conduct at initial hire or engagement.
- Acknowledge and sign for the receipt, review and understanding of the UW Medicine PCISA and its stated privacy and information security responsibilities at initial hire or engagement and annually.
- Discuss training obligations with supervisor or manager.
APPROVALS

/s/ Jim Mathis 8/24/2018
Jim Mathis Date
Chief Compliance Officer, UW Medicine
Associate Vice President for Medical Affairs, UW