Applicability: UW Medicine¹ and UW Medicine Affiliated Covered Entity²

Policy Title: Compliance Auditing and Monitoring

Policy Number: COMP.003

Superseded Policies: N/A

Date Established: July 26, 2010

Date Effective: October 11, 2017

Next Review Date: October 11, 2020

PURPOSE
This policy establishes baseline requirements for auditing and monitoring activities conducted in support of the UW Medicine Compliance Program, and applies to all UW Medicine compliance departments.

DEFINITIONS
See UW Medicine Compliance Glossary.

POLICY
UW Medicine compliance departments develop and maintain annual auditing and monitoring plans based on an assessment of the compliance requirements within their specific scope and jurisdiction. Factors that contribute to the likelihood and impact of noncompliance are considered in determining audit priorities, and audit plans are approved by the appropriate governance body. UW Medicine compliance audits are performed by compliance officials and their designees who are subject matter experts and have scope and jurisdiction in the following areas:

• Clinical billing.
• Emergency Medical Treatment and Active Labor Act (EMTALA).
• Health Insurance Portability and Accountability Act (HIPAA) and State patient information privacy laws.
• Research billing

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 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 University of Washington (UW) HIPAA Designation – UW Medicine – Affiliated Covered Entity.
• Other compliance audits as deemed necessary by regulatory need and risk assessments.

Annual compliance audit plans are reprioritized periodically in response to emerging risks, communicated to the appropriate stakeholders and coordinated with other internal audit departments to avoid duplication of efforts.

Compliance audits conform to the procedures established for each subject area with regard to initiation, notifications, review of results, documentation requirements, reporting of outcomes and remediation management.

Compliance departments analyze audit outcomes to identify trends, evaluate remediation effectiveness and determine the need for program enhancements. This information is reported to the appropriate leadership and compliance committee(s).

Compliance departments respond to noncompliance identified during the course of audits in an effective and timely manner, including, but not limited to the following steps:

1) Stop the noncompliant activity;
2) Assess reasons for and results of noncompliant activity;
3) Report noncompliance to relevant leadership and oversight bodies;
4) Notify external government entities in accordance with regulatory requirements;
5) Recommend actions to improve compliance and/or correct deficiencies;
6) Coordinate effective and meaningful management responses;
7) Provide targeted education and outreach;
8) Repay or otherwise remediate any overpayment;
9) Verify that remediation activities have been successfully deployed; and
10) Re-audit to ensure that the remediation has been successful.

REGULATORY/LEGISLATION/REFERENCES

PROCEDURE ADDENDUM(s) REFERENCES/LINKS
UW Medicine Compliance Glossary.

APPROVALS

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