

UW MEDICINE
COMPLIANCE PROGRAM

December 2017

TABLE OF CONTENTS

I.	INTRODUCTION.....	3
II.	UW MEDICINE.....	3
III.	OVERVIEW	4
	A. Purpose.....	4
	B. Scope	4
	C. Program Elements.....	5
IV.	PROGRAM STRUCTURE	6
	A. Compliance Oversight.....	6
	1. Executive Leadership	6
	2. Enterprise and UW Medicine Affiliated Covered Entity (UW Medicine ACE) Compliance Leadership.....	7
	B. Compliance Committees.....	7
	1. Enterprise-Level/UW Medicine ACE Committees.....	7
	a) UW Medicine Board Compliance Committee	7
	b) UW Medicine Compliance Governance Group.....	7
	c) UW Medicine Compliance Oversight and Implementation Steering Committee	8
	2. Practice Plan Compliance Committees	8
	3. Compliance Communication Venues.....	8
	a) Compliance Officers Group	8
	b) Strategic Leadership Council.....	8
	C. Compliance Program Management and Operations.....	8
	D. Compliance Roles and Responsibilities	9
	E. Enterprise Compliance Reporting Line	9
	F. Policies, Standards, Guidelines and Procedures	10
	G. Code of Conduct.....	11
V.	ATTACHMENTS.....	12
	A. University of Washington HIPAA Designation	12
	B. UW Medicine/UW Medicine ACE Patient Information Privacy and Security Compliance Governance	13
	C. Chief Compliance Officer/Associate Vice President for Medical Affairs	14
	D. UW Medicine Compliance Committees.....	18
	E. Core Compliance Officer Position Descriptions.....	19
	F. Compliance Roles and Responsibilities	25
	G. UW Medicine Code of Conduct	26

I. INTRODUCTION

UW Medicine is a large organization, consisting of eight owned or managed entities that operate in a highly regulated environment with a variety of compliance requirements and potential risks. The culture of compliance at UW Medicine is characterized by four major elements:

- Documented formal program activities, including audits and educational programs, designed to promote and support compliance and detect noncompliance;
- Formal structure, executive leadership engagement and support, and board-level involvement;
- Clearly defined responsibilities and system-wide education and outreach; *and*
- Formal channels of communication and a system-wide reporting hotline.

I am pleased with the progress of UW Medicine over the last 15 years in developing a culture of compliance among our 25,000 employees. Guided by the advice of the UW Medicine Board Compliance Committee, the UW Medicine management team has made continuous improvements in our compliance program. We are focused on identifying areas of high risk prospectively and developing policies and plans to mitigate the risks. The active engagement of our administrative teams with the UW Medicine Board and the Board's Compliance Committee is essential for the ongoing improvements that are planned for UW Medicine Compliance. It is a privilege for me to work with a very large number of individuals who are committed to excellence in our compliance program.

Paul G. Ramsey, M.D. CEO,
UW Medicine
Executive Vice President for Medical Affairs and Dean
of the School of Medicine,
University of Washington

II. UW MEDICINE

The UW Medicine enterprise includes the following owned or managed entities:

- Harborview Medical Center (HMC)
- Northwest Hospital & Medical Center (NWH)
- Valley Medical Center (VMC)
- UW Medical Center (UWMC)
- UW Neighborhood Clinics (UWNC)
- UW Physicians (UWP)
- UW School of Medicine (SoM)
- Airlift Northwest (ALNW)

UW Medicine is an “affiliated covered entity” under the federal Health Insurance Portability and Accountability Act (HIPAA). For the purposes of HIPAA compliance, the UW Medicine Compliance Program has jurisdiction over the healthcare components of the University of Washington (UW) in UW Medicine, as well as additional entities that are collectively referred to as the UW Medicine Affiliated Covered Entity (UW Medicine ACE). These entities are listed in the UW HIPAA Designation (see Attachment A); the HIPAA compliance program governance structure for the UW Medicine ACE is represented in Attachment B.

UW Medicine shares in the ownership and governance of Children’s University Medical Group (CUMG), a pediatric practice plan founded with Seattle Children’s (Children’s); and the Seattle Cancer Care Alliance (SCCA), founded with Children’s and the Fred Hutchinson Cancer Research Center (FHCRC).

UW Medicine’s mission is to improve the health of the public by advancing medical knowledge, providing outstanding primary and specialty care to the people of the region, and preparing tomorrow’s physicians, scientists and other health professionals.

III. OVERVIEW

A. Purpose

The purpose of the UW Medicine Compliance Program (the Program) is to assist UW Medicine in achieving its financial, operational and strategic goals while maintaining compliance with all applicable healthcare laws and regulations. The scope, structure, core functions and activities of the Program are updated as necessary to reflect organizational and policy changes, programmatic refinements and best practices for addressing compliance risk.

B. Scope

The following content areas are within the scope of the Program:

- Clinical billing and documentation (facility and professional fee billing for all clinical services including clinical research);
- Compliance with the provisions of state and federal laws governing patient information privacy and security (including, but not limited to HIPAA);
- Identity theft prevention;
- Stark law and Anti-Kickback Statute (AKS);
- Conflicts of interest (COI);
- Ethics; *and*
- Emergency Medical Treatment & Labor Act (EMTALA).

Compliance programs for other content areas (for example, research, health and safety, pre- and post-award research grants and contracts, employment), other entity partners (for example, SCCA, FHCRC, Children’s), or UW healthcare components (for example, Dentistry, Public Health, Nursing) are within other jurisdictions.

However, UW Medicine collaborates with its external entity partners and other parts of the UW system for any number of reasons, including but not limited to:

- Addressing compliance issues crossing institutional or jurisdictional lines;
- Enforcing compliance;
- Harmonizing policies, procedures and guidance;
- Engaging in mutually beneficial initiatives, process improvements and risk assessments;
- Sharing best practices;
- Monitoring regulatory developments, analyzing industry trends; *and*
- Identifying risk mitigation strategies.

C. Program Elements

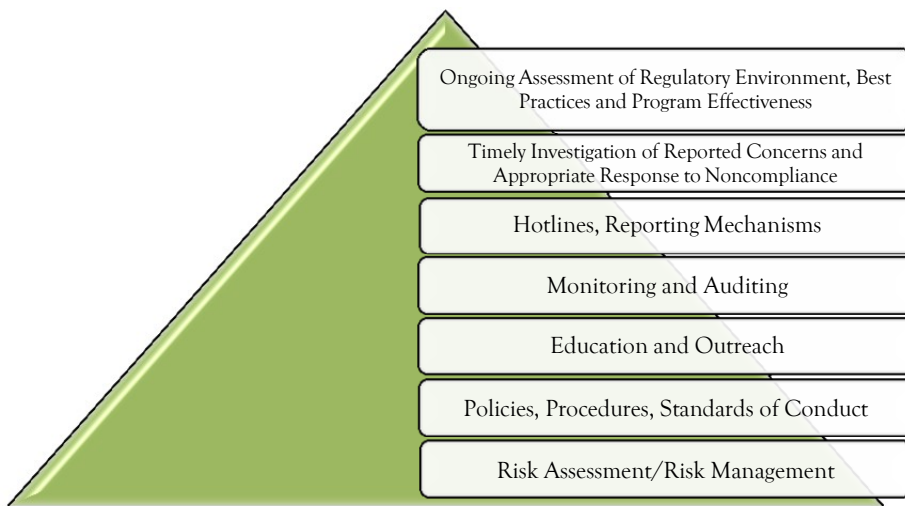
The Program is founded on both risk-based and proactive core components designed to promote and support compliance and detect noncompliance. Activities and program elements are documented in writing, readily available for review and regularly reported.

Specific program elements are aligned with standards established by the Office of Inspector General (OIG) for the healthcare profession, the Office for Civil Rights (OCR) for HIPAA Privacy and Security Rules, and the United States Federal Sentencing Guidelines, and include:

- Senior leadership commitment, board and executive-level compliance committees, and an operational implementation council;
- Designation of a chief compliance officer who:
 - Has direct reportage to the chief executive officer;
 - Has responsibility for overseeing UW Medicine compliance systems and initiatives; *and*
 - Serves as chief privacy and information security compliance official for the UW Medicine ACE with responsibility for developing and implementing policies and procedures required under HIPAA.
- Standards, policies and procedures to prevent and detect violations of law, protect patient information privacy, and safeguard protected health information (PHI);
- Internal controls to meet compliance and risk management requirements;
- Education and outreach activities to ensure that policies are effectively disseminated and understood by enterprise and UW Medicine ACE members;
- Documented risk management plans and risk assessment processes that conform to regulatory requirements established by federal oversight agencies;
- Documented development and implementation of risk mitigation strategies and work plans, and timely reporting to executive and board-level compliance committees;
- Internal monitoring and auditing;

- Reasonable due diligence to confirm that UW Medicine does not delegate substantial discretionary authority to individuals who the organization knows or should know, are likely to engage in illegal conduct;
- Maintaining lines of communication, including an anonymous reporting mechanism for employees to report possible compliance issues without fear of retribution;
- Prompt investigation of reported concerns, including noncompliance with enterprise policies, suspected overpayments, patient information privacy complaints and security incidents involving PHI;
- Effective management of noncompliance, overpayments, complaints and incidents to meet the timelines and requirements established by regulators for repayments, disclosure and breach notifications;
- Appropriate corrective action to reduce the impact and minimize the risk of similar future offenses and incidents;
- Enforcement of standards and policies through well-publicized disciplinary guidelines; *and*
- Periodic evaluation of the effectiveness of the Program.

The Program is simplified in the following graphic:



IV. PROGRAM STRUCTURE

A. Compliance Oversight

1. Executive Leadership

The chief executive officer, UW Medicine, executive vice president for medical affairs, and dean of the School of Medicine, University of Washington (CEO/EVPMA/Dean), provides compliance leadership and support. The CEO/EVPMA/Dean delegates specific responsibilities to key senior leadership positions.

2. **Enterprise and UW Medicine ACE Compliance Leadership**

The chief compliance officer, UW Medicine, and associate vice president for medical affairs, University of Washington (CCO/AVPMA), is accountable to the CEO/EVPMA/Dean for leadership of UW Medicine's compliance systems and initiatives and is the designated policy owner for all enterprise and UW Medicine ACE-level compliance policies. The CCO/AVPMA has a direct relationship with the UW Medicine Board Compliance Committee, serving as the chief staff person for the Committee, and with the Office of the President of the University. The CCO/AVPMA is a member of UW Medicine's senior leadership team (see Attachment C for job description).

B. Compliance Committees

1. **Enterprise-Level/UW Medicine ACE Committees**

The scope, purpose and composition of the compliance committees are summarized in Attachment D.

a) **UW Medicine Board Compliance Committee (UWMB CC)**

The UWMB CC is responsible for reviewing and evaluating the Program and preparing the Chair of the UW Medicine Board to advise the UW Board of Regents, the UW president and the CEO/EVPMA/Dean regarding the implementation and effectiveness of the Program. Section 1.4.3 of the UW Medicine Board Bylaws requires an annual report to the UW Board of Regents regarding the effectiveness of the Program, which includes but is not limited to, the following topics:

- Key compliance policies and issues;
- Status of the compliance program infrastructure and reporting relationships;
- Scope of authority of key positions;
- Current assessment of compliance risks; *and*
- Level of resources dedicated to the compliance programs.

b) **UW Medicine Compliance Governance Group (CGG)**

Chaired by the CEO/EVPMA/Dean or designee, the steering committee of this group meets regularly for the purpose of strategic planning and problem solving, risk assessment decision-making and policy approval. Members include UW Medicine vice presidents, the CCO/AVPMA, and issue-specific participants as needed.

c) **UW Medicine Compliance Oversight and Implementation Steering Committee (COISC)**

The COISC is chaired by the CCO/AVPMA and is primarily responsible for overseeing implementation of compliance program activities and internal controls throughout the organization. Members include entity executive directors, SoM vice deans, chief information officers, compliance officers and major stakeholders.

2. **Practice Plan Compliance Committees**

The boards of UWP and CUMG have established physician-led compliance committees. The UWP Business Excellence Committee and the CUMG Physician Education, Billing and Compliance Committee work closely with practice plan compliance officials in developing and implementing compliance policies, establishing effective training strategies, and advising their respective boards. Each committee has a formal charter and generally meets monthly. All official committee records are maintained by compliance officials.

3. **Compliance Communication Venues**

The size and complexity of the UW Medicine structure and its many interfaces call for multiple communication channels to convey compliance messages and initiatives. The following groups provide additional venues for discussion and raising awareness about compliance issues.

a) **Compliance Officers Group (COG)**

Convened by the CCO/AVPMA, this group includes UW Medicine compliance officers, department-level compliance directors and liaisons, non-UW Medicine compliance officials, internal audit, risk management and operational partners. COG shares best practices and resources, discusses issues of mutual interest/concern, and enhances the likelihood of cross-functional collaboration for important compliance issues.

b) **Strategic Leadership Council**

Chaired by the CEO/EVPMA/Dean, this group consists of UW Medicine senior leaders who meet at least monthly to address key operational, finance, compliance and strategic issues.

C. **Compliance Program Management and Operations**

Three core compliance officers oversee and implement program operations for specific content areas within UW Medicine's defined scope and jurisdiction. Program operations include activities designed to detect and prevent noncompliance, as described in Section III.C. Each compliance officer has associated responsibilities for reporting, committee management and stakeholder involvement. Officers develop jurisdiction-specific policies and procedures as needed, maintain program records, and participate in enterprise compliance initiatives. See Attachment E for current position descriptions.

Several departments and entities have established compliance positions responsible for a specific scope of program activities. Although the individuals holding these positions have different titles, they function as compliance officer liaisons and interface with the core compliance officers on issues of mutual concern, are members of COG, and participate in work groups as deemed appropriate for their scope and specialty. Positions generally report to the department or entity head; position descriptions are established and maintained by the individual units. These positions include the following:

1. Laboratory Medicine Compliance Liaison;
2. Pharmacy Compliance Liaison;
3. UWNC Director of Network Operations; *and*
4. ALNW Compliance Liaison.

D. Compliance Roles and Responsibilities

UW Medicine expects all faculty, physicians, staff, students, trainees and volunteers to meet the professional, ethical and regulatory standards associated with their individual roles, and to adhere to the Code of Conduct (Attachment G).

Additional responsibilities are assigned to persons in supervisory, management and leadership positions. These expectations, summarized in Attachment F, are conveyed in new employee orientations, mandatory and voluntary training, and regular communications from compliance officers and senior leaders.

E. Enterprise Compliance Reporting Line

UW Medicine/UW Medicine ACE workforce members have safe communication and reporting channels. The enterprise compliance hotline is maintained by the CCO/AVPMA. It provides for anonymous reporting of compliance concerns, although requests for consultation and complaints may also be conveyed directly to compliance officials with the appropriate scope and jurisdiction.



F. Policies, Standards, Guidelines and Procedures



The Program is based on a framework of policies that articulate UW Medicine's commitment to meet regulatory requirements, establish the culture of compliance, and inform members of the enterprise about allowable and prohibited practices and activities. UW Medicine also relies on standards, guidelines and procedures to meet its compliance requirements.

The Program includes nine core policies that govern the program itself, a code of conduct governing workforce members, and a suite of compliance policies governing specific healthcare functions and activities. These **policies** are intended to establish a definitive, centralized leadership position on specific compliance requirements that apply universally to all UW Medicine and UW Medicine ACE workforce members, entities and compliance departments. They are designed to ensure system-wide consistency and form the foundation of the Program. Complete policies are located at <http://depts.washington.edu/comply/policies>.

Additional **compliance policies may be developed by compliance officials** who have the authorized scope and jurisdiction to address regulatory or organizational requirements affecting a subset of the system, such as specific entities, constituents or issues. These policies have more limited application, but still are intended to establish a definitive leadership position on certain compliance requirements. The baseline requirements for compliance policy development apply regardless of the policy level.

Standards are specific mandatory controls that govern an operation, a configuration, or a process. Standards are developed and maintained by the operational area delegated with responsibility for establishing internal controls. For example, standards governing information security are established by IT departments in the UW Medicine ACE (including UW Medicine IT Services, SoM IT and VMC IT). Standards undergo a formal review and approval process, and those required by HIPAA are reviewed and endorsed by the CCO/AVPMA.

Guidelines are frequently developed to recommend best practices that do not have the force of policy. Guidelines are generally created by compliance officials, with appropriate scope and jurisdiction, in collaboration with key stakeholders and operational areas.

Procedures are step-by-step instructions that, if followed, should achieve compliance with a given policy. Procedures are typically maintained by the operational departments charged with specific implementation responsibilities for a given policy or set of policies. Procedures are developed in consultation with compliance officials, with appropriate scope and jurisdiction, but are established through separate and less formal approval and implementation processes.

G. Code of Conduct

The UW Medicine Compliance Code of Conduct includes 7 core principles, which require all workforce members and entities to:

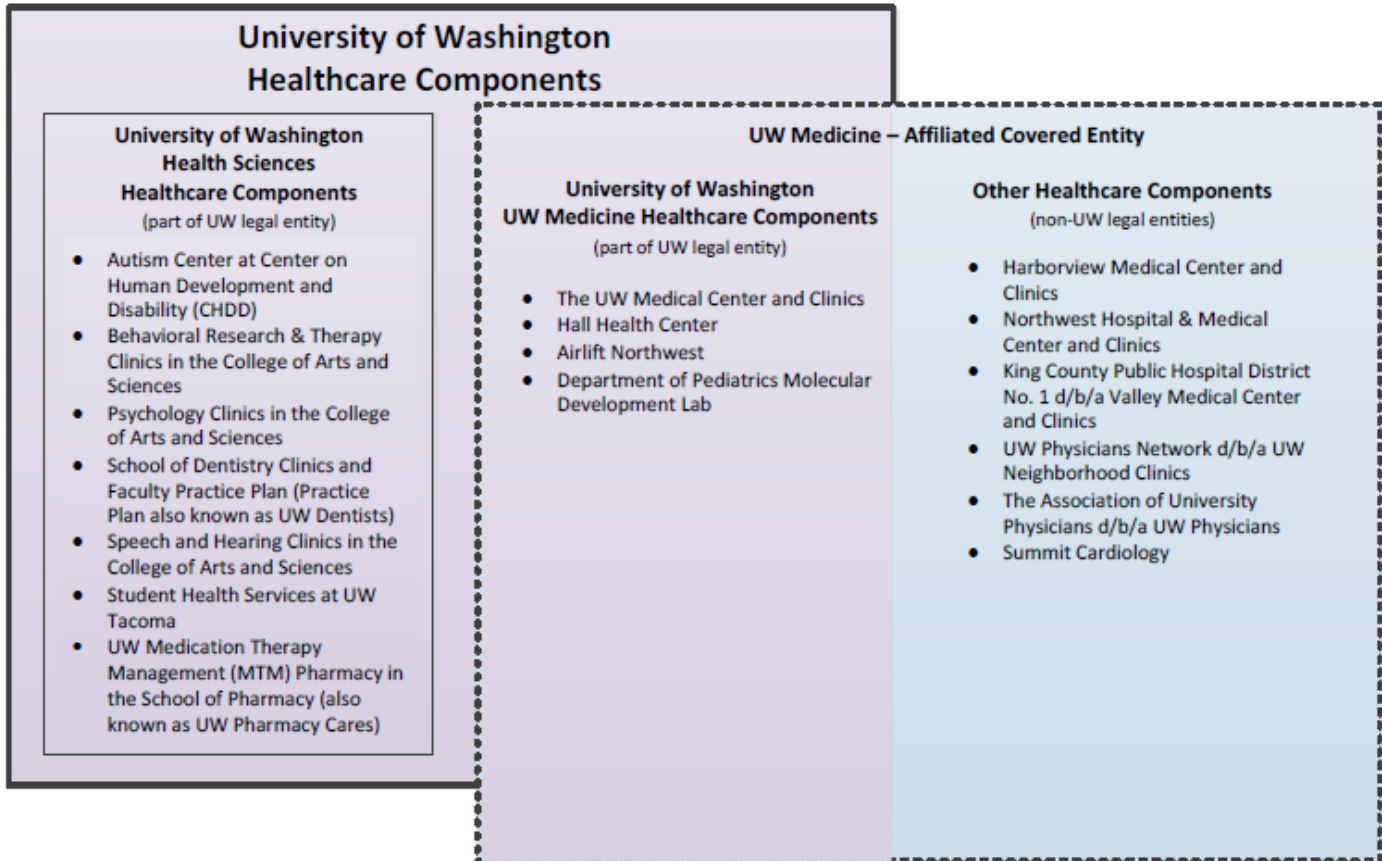
1. Abide by all laws, regulations, policies, procedures and standards;
2. Prevent fraud and abuse;
3. Promote ethical academic, clinical, research and business conduct;
4. Protect patient privacy and ensure the security of protected health information;
5. Practice responsible data stewardship;
6. Comply with professional and ethical standards;
7. Comply with emergency medicine treatment rules

These principles are fully explained in the complete Compliance Code of Conduct provided in Attachment G. It is the responsibility of every UW Medicine workforce member to be knowledgeable about and to act in a manner consistent with these standards. Where circumstances arise that are not covered by these standards or UW Medicine policies, an overall philosophy of honesty and integrity applies.

V. ATTACHMENTS

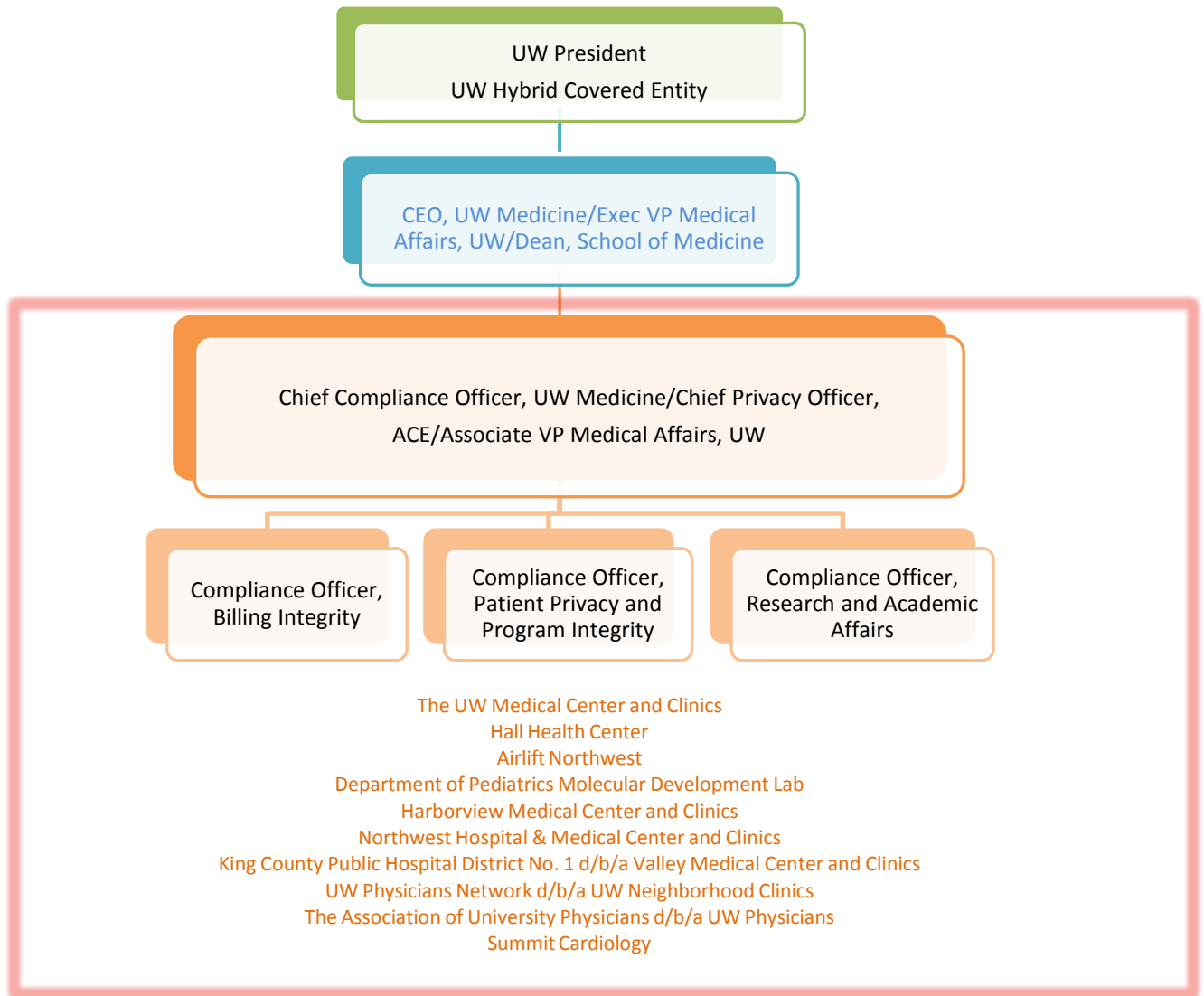
A. University of Washington HIPAA Designation

University of Washington (UW) HIPAA Designation



101.G1 : 20170125

B. UW Medicine/UW Medicine ACE Patient Information Privacy and Security Compliance Governance



C. Chief Compliance Officer/Associate Vice President for Medical Affairs

**UW MEDICINE
POSITION SPECIFICATION
CHIEF COMPLIANCE OFFICER, UW MEDICINE AND
ASSOCIATE VICE PRESIDENT FOR MEDICAL AFFAIRS,
UNIVERSITY OF WASHINGTON**

SUMMARY POSITION DESCRIPTION

The Chief Compliance Officer, UW Medicine/Associate Vice President for Medical Affairs, University of Washington (CCO/AVPMA) is accountable to the CEO, UW Medicine, Executive Vice President for Medical Affairs and Dean of the School of Medicine (CEO/EVPMA/Dean), for compliance activities in areas including but not limited to clinical billing, clinical research billing, faculty effort reporting, Health Insurance Portability and Accountability Act (HIPAA) privacy and security for the UW Medicine Affiliated Covered Entity (ACE), Emergency Medical Treatment and Active Labor Act (EMTALA), and identity theft prevention. The CCO/AVPMA is accountable to the CEO/EVPMA/Dean for leadership of UW Medicine's compliance systems and initiatives and also works closely with the Chief Health System Officer, UW Medicine, Vice President for Medical Affairs (CHSO/VPMA), the Chief Business Officer, UW Medicine, Vice President for Medical Affairs (CBO/VPMA), the Chief Financial Officer, UW Medicine, Vice President for Medical Affairs (CFO/VPMA), the Chief Medical Officer, UW Medicine, Vice President for Medical Affairs (CMO/VPMA), and the Chief Advancement Officer, UW Medicine, Vice President for Medical Affairs (CAO/VPMA).

The CCO/AVPMA has a direct relationship with the UW Medicine Board Compliance Committee, serving as the chief staff person for the Committee, and with the Office of the President of the University. The CCO/AVPMA is a member of UW Medicine's senior leadership team and chairs the UW Medicine/ACE Compliance Oversight and Implementation Steering Committee.

The CCO/AVPMA has an important role in the development of strategies and initiatives to advance the UW Medicine mission of improving the health of the public. Important work required to advance the UW Medicine mission includes, in part, the delivery of advanced medical diagnosis and treatment services, clinical support for the education of medical students and graduate and post-graduate trainees, and maintenance of one of the largest and most advanced university-based basic and clinical research programs in the United States. In support of these activities, the CCO/AVPMA must maintain strong working relations with the U.S. Department of Health and Human Services, the Office for Civil Rights, U.S. Department of Justice, Washington Department of Social and Health Services, the Medicare intermediary for Washington state, and other similar agencies. The CCO/AVPMA also represents UW Medicine for compliance issues in national professional associations, including but not limited to the Association of Academic Medical Centers (AAMC) and Association of Academic Health Centers (AAHC).

A brief summary of the significant characteristics of the distinct responsibilities and duties of this position are outlined below.

JOB CHARACTERISTICS

DIRECT MANAGEMENT RESPONSIBILITIES

- Establishing and maintaining a comprehensive UW Medicine Compliance program which includes HIPAA privacy and information security compliance for the UW Medicine ACE
- Developing standards, timelines and documentation requirements for enterprise-level compliance risk assessments for UW Medicine and the ACE
- Establishing and maintaining core compliance policies governing UW Medicine and ACE, and issuing related communications and guidelines
- Advising the CEO/EVPMA/Dean, CHSO/VPMA, CBO/VPMA, CFO/VPMA, CAO/VPMA, CMO/VPMA and the UW President on the status of material compliance issues at UW Medicine and within the ACE
- Assessing the effectiveness of the compliance program
- Overseeing the response to allegations of noncompliance for issues that involve more than one UW Medicine or ACE entity
- Serving as the chief staff support to the UW Medicine Board Compliance Committee, working with the Committee chair to develop annual schedule, manage meeting agendas and establish standard formats for reports to the Committee
- Preparing the annual compliance report to the UW Board of Regents
- Providing technical advice and guidance regarding UW Medicine's regulatory compliance programs, and state and federal compliance rules and regulations
- Providing executive leadership for the CEO/EVPMA/Dean in matters related to the philosophy and organizational structure of the UW Medicine compliance program
- Chairing the UW Medicine/ACE Compliance Planning Group and the UW Medicine/ACE Oversight and Implementation Steering Committee
- Determining staffing needs (in collaboration with the enterprise compliance officers and senior leaders) of the UW Medicine compliance program
- Overseeing the recruitment, hiring, mentoring and supervision of UW Medicine compliance officers and directors
- Serving as Chief HIPAA Privacy and Information Security Officer for the UW Medicine ACE, establish policies, internal controls and program activities related to HIPAA compliance, incident management, risk assessments, document retention, breach assessments and notifications, and identity theft prevention
- Serving as the Interim UW Privacy Official, reporting directly to the UW President

SHARED MANAGEMENT RESPONSIBILITIES

- Overseeing and coordinating the activities of the compliance officers from the University of Washington Physicians, UW Medicine, the UW School of Medicine, Children's University Medical Group and the Seattle Cancer Care Alliance.
- Participating in the recruitment and selection process for enterprise compliance officers.
- Addressing privacy and information security risks, internal controls, operational issues, initiatives and incidents in collaboration with officers and departments throughout the UW covered entity, including: IT and Information Security Operations Officers for the UW, UW Medicine IT Services, the UW SoM, and Valley Medical Center; UW Medicine Health Information Management offices; UW Health Sciences Risk Management; UW Office of Research, UW and UW Medicine News and Community Relations.
- Directing regular UW Medicine/ACE-wide compliance risk assessments that will guide the design and support of the compliance program, conform to regulatory requirements, and ensure an integrated, long-range view of emerging risks.
- Overseeing the development, documentation and tracking of risk mitigation and management plans for the ACE.
- Participating in the ongoing review and analysis of UW Medicine's programs to manage regulatory compliance risks.
- Ensuring that education, communication, and outreach mechanisms effectively support compliance efforts.

COORDINATION & LIAISON RESPONSIBILITIES

- Serving as the CEO/EVPMA/Dean's chief liaison with offices of the UW administration and the UW Division of the Office of the Attorney General on matters of compliance.
- Serving on the UW Medicine Compliance Governance Group, Operations and Finance Committee, and other executive-level committees of UW Medicine.
- Participating in strategic planning processes for the Office of the CEO/EVPMA/Dean and assisting the CEO/EVPMA/Dean and the Compliance Governance Group in developing a vision and direction for UW Medicine that establishes a long-term compliance agenda for UW Medicine.
- Coordinating administrative and other matters that involve compliance policy issues with the UW Medicine Compliance Governance Group and the Compliance Oversight and Implementation Steering Committee.
- Representing UW Medicine Compliance in national, state and regional associations.

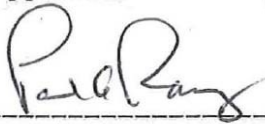
EDUCATION REQUIREMENTS

A Bachelor's degree in business, public administration, policy administration, health administration or closely related field is required; an advanced degree is desirable.

WORK EXPERIENCE REQUIREMENTS

- Seven years of progressively responsible experience in developing, implementing and administering comprehensive compliance programs is required, at least three years of which must be at the director level or above in a public university setting.
- At least five years of increasingly responsible compliance experience in an academic medical center is desired.
- Extensive knowledge of compliance principles and regulatory requirements that impact academic medical centers is required.

Approved:



5/19/16

Paul G. Ramsey, M.D.

Date

CEO, UW Medicine

Executive Vice President for Medical Affairs and

Dean of the School of Medicine,

University of Washington



5/19/16

Susette Clausen

Date

Chief Compliance Officer, UW Medicine and

Associate Vice President for Medical Affairs,

University of Washington

D. UW Medicine Compliance Committees

UW MEDICINE COMPLIANCE COMMITTEES

GROUP/SCOPE	PURPOSE	COMPOSITION
<p>Compliance Governance Group (CGG)</p> <p>Scope: Enterprise and for HIPAA, the UWM Affiliated Covered Entity</p> <p>Deliverables: Executive-level compliance program mandates and structure</p>	<ul style="list-style-type: none"> • Strategic compliance planning & problem solving • Approve enterprise compliance program (including policies, program elements, work plan, roles & responsibilities, committee structure) • Approve enforcement mandates and related messaging • Establish risk tolerance philosophy, approve mitigation plans and allocate resources • Recommend approval of compliance policies to CEO/EVPMA/Dean 	<ul style="list-style-type: none"> • VPs (CBO/VPMA chair) • CCO/AVPMA • Director of Legal & Bus Affairs/AVPMA • Vice Dean Admin & Fin, SOM • UWP President • Issue-specific advisors <ul style="list-style-type: none"> ○ Vice Deans: Research, Education, GME ○ Executive directors ○ Legal counsel/AAG ○ Content experts (e.g., CISO, COs, HR) • Steering Committee excludes CFO, CMO and CAO
<p>UW Medicine Board Compliance Committee (UWMB CC)</p> <p>Scope: Enterprise and for HIPAA, the UWM Affiliated Covered Entity</p> <p>Deliverables: Board-level oversight and advice</p>	<ul style="list-style-type: none"> • Review and evaluate UWM Compliance Program • Prepare UWMB Chair to advise UW Board of Regents on the implementation & effectiveness of the program 	<ul style="list-style-type: none"> • All scheduled meetings <ul style="list-style-type: none"> ○ UWMB member designees ○ Appointed community members ○ Compliance Governance Group • Meetings for which issue or entity-specific discussions are held <ul style="list-style-type: none"> ○ COs and other content experts ○ Legal counsel/AAG ○ Entity executive directors ○ CUMG practice plan president ○ COISC representatives and subgroup conveners
<p>Compliance Oversight and Implementation Group (COISC)</p> <p>Scope: Enterprise and for HIPAA, the UWM Affiliated Covered Entity</p> <p>Deliverables:</p> <ul style="list-style-type: none"> • Consistent implementation of compliance policies • Risk assessments & policy recommendations for CGG • Effective enforcement mechanisms & internal controls 	<ul style="list-style-type: none"> • Oversee consistent implementation of compliance program activities throughout UW Medicine entities • Review proposed compliance policies and recommend approval to CGG • Identify and resolve implementation challenges/barriers • Communicate enforcement mandates • Participate in enterprise risk assessment process, recommend approval of mitigation plans, identify resource needs 	<ul style="list-style-type: none"> • Steering Committee <ul style="list-style-type: none"> • CCO/AVPMA, chair • Entity EDs • CIOs/CISOs for UWM ITS, VMC, SOM • COs for UWM, CUMG, SCCA • SOM Vice Dean for RGE • SOM Vice Dean for GME • UWM Director of HIM • AGO as needed for all groups

E. Core Compliance Officer Position Descriptions

Compliance Officer – Clinical Billing Integrity

Position Purpose

The purpose of this position is twofold:

1. Develop and oversee implementation of an effective compliance program to ensure the integrity of clinical billing, coding and documentation and prevent healthcare fraud, waste and abuse.
2. Serve as the primary content expert for clinical billing and documentation compliance.

Specific Duties and Responsibilities

- Provide professional leadership as the principle architect of the CBI program, to include facility and professional fee clinical documentation/coding/billing, clinical research billing, as well as EMTALA compliance; advise the CCO/AVPMA, UW Medicine Vice Presidents, the UWP President, UW Medicine entity executive directors and other UW Medicine leaders about program needs and system interfaces, and recommend changes as needed
- Establish effective CBI program elements and practices that ensure:
 - execution of an approved risk assessment process and incorporation of results into written work plans that identify deliverables, timelines and responsible parties
 - effective monitoring and auditing that includes analysis, reporting and use of results to modify program strategy as needed
 - reliable and operationally sound employee, medical staff and vendor screening mechanisms that ensure independent contractors and agents who furnish supplies and medical services to the hospitals and clinics are aware of the compliance program requirements.
 - accurate and clear program policies and CBI education/outreach content that provides effective guidance, facilitates compliance and mitigates risk
- Maintain awareness of laws, regulations and status of current enforcement initiatives.
- Serve as the UW Medicine point of contact for CBI and EMTALA issues and concerns. Oversee the response to reported concerns and inquiries involving CBI. Ensure that inquiries, complaints and other concerns are properly investigated and resolved, providing consultative leadership and support to all entities as appropriate; and ensure that adequate steps are taken to correct identified problems and prevent their reoccurrence, including employee sanctions, operational changes, and refunds of overpayments.
- Serve as a member of the CCO/AVPMA's executive team, working closely with other content experts to achieve efficiencies and effectiveness throughout the compliance department, and participate in departmental strategic planning, internal policy/procedure development, budget and resource planning, and business decisions.
- Establish cooperative and collaborative relationships with compliance and operational offices on matters of shared concern, and serve as liaison between those offices and UW Medicine entities to ensure effective and timely management of issues, initiatives and projects.
- Provide direct support and assistance to entity executives when they are jointly responsible with UW Medicine Compliance for the success of compliance programs in their respective areas

- Provide regular reports on program activities and issues to the CCO/AVPMA, UW Medicine Vice Presidents, the UWP President, UW Medicine entity executive directors and other UW Medicine leaders and compliance committees.
 - Provide strategic oversight of staff responsible for daily program activities; directly supervise the CBI leadership team and other staff as needed; provide leadership, mentoring, staff development, and performance management; take disciplinary actions as needed in consultation with human resource department. Anticipate staffing and resource needs.
 - Convene constituent and entity-based compliance committees and work groups as needed.
 - Serve as the primary point of contact for external reviews related to CBI or delegate authority as appropriate; coordinate assessments and ensure timely responses; communicate openly and promptly with payers, the OIG and other external parties as deemed appropriate; maintain good relationships with these parties
 - Serve as contact with legal counsel and the Attorney General's Office regarding related compliance strategies and responses to legal issues.
 - Participate in institution-wide initiatives, process improvement projects, and policy implementation processes as necessary; serve on committees and taskforces as assigned.
- Represent the CCO/AVPMA as necessary.

QUALIFICATIONS

Required

- Bachelor's degree in related field AND 12 years of progressively responsible experience in developing, implementing and administering a compliance program to prevent healthcare fraud, waste and abuse in a complex healthcare environment that includes at least 3 years of demonstrated success managing and leading large teams performing highly detailed work **
- Advanced knowledge of federal and state compliance regulations, including experience with hospital and physician billing, coding and documentation requirements
- Demonstrated ability to communicate effectively, both verbally and in writing, with employees, medical staff, board members and external parties; strong presentation skills
- Demonstrated ability to independently prioritize and organize work, basic computer knowledge, ability to lead interdisciplinary teams

**or an equivalent combination of education and work experience

Preferred

- Advanced degree in related field
- Professional Healthcare Compliance certification
- At least 3 years' experience at the assistant compliance officer/director level or above in an academic health center environment

**or an equivalent combination of education and work experience

Compliance Officer – Patient Privacy and Program Integrity

Position Purpose

This position serves three primary roles:

1. As Privacy Officer for the UW Medicine Affiliated Covered Entity (ACE), serve as primary content expert and oversee development and implementation of the compliance program governing patient privacy and information security.
2. Provide strategic leadership to ensure the integrity and effectiveness of the UW Medicine compliance program.
3. Serve as a content expert for ethics, conflicts of interest, Stark and Anti-Kickback issues, working closely with other UW Medicine COs, legal counsel and business units to resolve inquiries and concerns.

This position oversees the work of assistant compliance officers and/or directors who direct technical and support staff responsible for daily program activities in privacy/information security and program integrity.

Specific Duties and Responsibilities

1. Serve as in-house expert on matters of compliance content areas including patient privacy and information security, identity theft prevention, ethics, Stark/AKS, conflicts of interest, vendor relations, etc. Maintain awareness of laws/regulations, status of current enforcement initiatives, and best practices to ensure program integrity.
2. Serve as the principle architect of the program functions necessary for an effective patient privacy/information security compliance program, working closely with the UW Medicine chief privacy officer and collaborating with other institutional privacy officials on matters of shared concern. Establish program elements and practices that ensure:
 - a. execution of an approved risk assessment process and incorporation of results into written work plans that identify deliverables, timelines and responsible parties
 - b. effective monitoring and auditing that includes analysis, reporting and use of results to modify program strategy as needed
 - c. accurate and clear program policies and education/outreach content that provides effective guidance, facilitates compliance and mitigates risk
 - d. timely and thorough handling of inquiries and complaints
3. Advise the CCO/AVPMA and executive leaders on best-practices for ensuring program integrity and mitigating organizational risk, including but not limited to committee structures, policies and procedures, communication channels, education and training, monitoring/auditing, investigation, enforcement and risk assessment.
4. Serve as a member of the CCO/AVPMA's executive team, working closely with other content experts to achieve efficiencies and effectiveness throughout the compliance department, and participate in departmental strategic planning, internal policy/procedure development, budget and resource planning, and business decisions.
5. Provide strategic oversight of staff responsible for daily activities in assigned program areas; directly supervise assistant compliance officers, directors and/or senior specialists; provide leadership, mentoring, staff development, and performance management; take disciplinary

actions as needed in consultation with human resource department. Anticipate staffing and resource needs.

6. Provide consultative leadership and support to the CCO/AVPMA and entity executives to ensure that adequate steps are taken to correct identified problems and prevent their reoccurrence, including employee sanctions and operational changes.
7. Establish cooperative and collaborative relationships with compliance and operational offices on matters of shared concern, and serve as liaison between those offices and UW Medicine entities to ensure effective and timely management of issues, initiatives and projects.
8. Provide direct support and assistance to entity executives when they are jointly responsible with UW Medicine Compliance for the success of compliance programs in their respective areas
9. Provide regular reports on program activities and issues to the CCO/AVPMA, UW Medicine Vice Presidents, UW Medicine entity executive directors and other UW Medicine leaders and compliance committees.
10. Convene constituent and entity-based compliance committees and work groups as needed.
11. Serve as the primary point of contact for external reviews related to patient privacy or delegate authority as appropriate; coordinate assessments and ensure timely responses; communicate openly and promptly with external parties as deemed appropriate; maintain good relationships with these parties.
12. Serve as contact with legal counsel and the Attorney General's Office regarding related compliance strategies and responses to legal issues.
13. Participate in institution-wide initiatives, process improvement projects, and policy implementation processes as necessary; serve on committees and taskforces as assigned.
14. Represent the CCO/AVPMA as necessary.

QUALIFICATIONS

Required

- Bachelor's degree in related field AND 12 years of progressively responsible experience in developing, implementing and administering a compliance program in a complex healthcare environment**
- Advanced knowledge of federal and state healthcare regulations governing patient privacy and information security, ethics, conflicts of interest, Stark and the AntiKickback Statute
- Advanced knowledge of best practices for ensuring the integrity and effectiveness of compliance programs
- Demonstrated ability to communicate effectively, both verbally and in writing, with employees, medical staff, board members and external parties; strong presentation skills
- Demonstrated ability to independently prioritize and organize work, basic computer knowledge, ability to lead interdisciplinary teams
- Proven leadership, supervision, communication, team-building and problem-solving skills; demonstrated ability to work independently and effectively prioritize work
- Demonstrated success in leading projects/initiatives, designing work processes, and implementing programs within a multifaceted, highly matrixed organization

Preferred

- Advanced degree in law, business administration, public health or policy
- Professional healthcare compliance certification
- 3 years experience as a Privacy Officer in an academic health center

- At least 7 years experience at or above the assistant compliance officer level or above in an academic health center

**or an equivalent combination of education and work experience

Compliance Officer – Research and Academic Affairs

Position Purpose

1. Coordinate and support compliance-related activities across UW Medicine in the subject matter areas detailed below. The CO has a particular role involving SoM constituents and entities and must receive inquiries/concerns and make appropriate referrals, coordinate investigations, participate in the assessment and mitigation of compliance risks that affect the SoM, provide regular status reports, and work with SoM departments to ensure implementation of healthcare and University compliance policies
2. Coordinate compliance issues, initiatives and projects that may fall under the jurisdiction of University compliance and risk management offices and that impact the affairs, interests and/or constituents of UW Medicine.

Duties and Responsibilities

1. Provide professional leadership for and coordination of compliance issues affecting the SoM; participate in the development of SoM-specific strategies for compliance education, outreach, monitoring and auditing; participate in risk assessments and monitor completion of SoM risk mitigation activities.
2. Serve as the UW Medicine Compliance point of contact for University compliance content areas (including but not limited to research, graduate medical education, privacy, information security, environmental health and safety, conflicts of interest, regulatory compliance, ethics, professionalism) to address UW Medicine risks and interests. Advise the CCO/AVPMA and SoM officials about program needs and system interfaces, and recommend changes as needed.
3. Serve as the UW Medicine Compliance lead for compliance in the area of research integrity, conflicts of interest, and other non-billing related regulatory areas at UW Medicine entities other than the School of Medicine.
4. Ensure that inquiries, complaints and other concerns are properly investigated and resolved, providing consultative leadership and support to all entities as appropriate; verify that adequate steps are taken to correct identified problems and prevent their reoccurrence, including employee sanctions and operational changes.
5. May directly supervise administrative assistant; provide leadership, mentoring, staff development and performance management; take disciplinary actions as needed in consultation with human resource department. Anticipate staffing and resource needs.
6. Maintain awareness of applicable laws, regulations and status of current enforcement initiatives
7. Participate in the delivery of education and outreach, conduct audits and risk assessments, or perform internal reviews of compliance effectiveness, working closely with UW Medicine compliance teams

8. Serve as a member of the CCO/AVPMA's executive team, working closely with other content experts to achieve efficiencies and effectiveness throughout the compliance department, participate in departmental strategic planning, internal policy/procedure development, budget and resource planning, and business decisions
9. Establish cooperative and collaborative relationships with compliance and operational offices on matters of shared concern, and serve as liaison between those offices and UW Medicine entities to ensure effective and timely management of issues, initiatives and projects
10. Participate in institution-wide initiatives, process improvement projects, and policy implementation processes as necessary; serve on committees and taskforces as assigned.
11. Provide direct support and assistance to entity executives who are responsible for the success of compliance programs in their respective areas
12. Provide regular reports on program activities and issues to the CCO/AVPMA, entity leaders, and compliance committees
13. Convene constituent and entity-based compliance committees and work groups as needed
14. May serve as point of contact for external reviews or delegate authority as appropriate; coordinate assessments and ensure timely responses
15. Serve as point of contact with legal counsel and the Attorney General's Office regarding related compliance strategies and responses to legal issues.
16. Represent the CCO/AVPMA as necessary.

Qualifications

Required

- Bachelor's degree in related field AND 10 years of progressively responsible experience managing or coordinating compliance, legal or regulatory affairs in a complex academic, research, healthcare or governmental setting**
- Knowledge of federal and state compliance regulations governing medical schools, academic medical centers and research universities and experience managing concerns, participating in or leading investigations, and ensuring effective resolution
- Demonstrated ability to communicate effectively, both verbally and in writing, with employees, medical staff, board members and external parties; strong presentation skills
- Demonstrated ability to independently prioritize and organize work, basic computer knowledge, ability to lead interdisciplinary teams
- Demonstrated skills in problem-solving, collaboration and team work to ensure the effective resolution of issues and concerns

Preferred

- JD or Master's Degree in related field
- Professional Healthcare Compliance certification
- Knowledge of and ability to navigate the University and SoM
- Experience within UW Medicine providing professional level management of sensitive and confidential issues
- Assistant compliance officer/director level experience in an academic health center or research university environment

**or an equivalent combination of education and work experience

F. Compliance Roles and Responsibilities

INDIVIDUAL	CHAIRS, DIRECTORS, SUPERVISORS	SENIOR LEADERS	COMPLIANCE
<ul style="list-style-type: none"> • Practice personal, professional, ethical and legal accountability • Understand role-specific responsibilities and applicable policies and procedures; complete all required training • Comply with University of Washington (UW) policies and procedures • Protect patient privacy, safeguard confidential information and utilize appropriate technical controls; observe access rights and restrictions • Report compliance concerns and potential compromises of confidential information to administration or compliance; cooperate fully with investigations 	<ul style="list-style-type: none"> • Convey accountability expectations to direct reports • Monitor compliance with UW policies and procedures • Ensure direct reports understand their roles, responsibilities and applicable policies and procedures; enforce onboarding and annual refresher training requirements • Oversee operational implementation of compliance policies and procedures; improve audit results • Actively manage data access rights; monitor use of appropriate safeguards and controls; comply with risk management decisions • Address concerns and/or refer to compliance; implement corrective actions and sanctions 	<ul style="list-style-type: none"> • Provide active leadership; establish accountability expectations and professional standards; allocate resources for compliance program activities • Approve UW Medicine policies; support education and outreach activities; convey implementation expectations to operational areas • Enforce compliance; evaluate audit findings and convey expectations for improved results • Participate in risk assessment process; evaluate results; determine systemwide risk tolerance; make risk management decisions • Receive investigative reports; evaluate findings and determine appropriate corrective actions and sanctions 	<ul style="list-style-type: none"> • Maintain effective compliance programs to prevent, detect and resolve noncompliance with federal and state laws and UW policies • Establish UW Medicine compliance policies, education and outreach strategies, internal controls, audit plans and implementation tools • Audit compliance with UW Medicine policies and internal controls; report findings; analyze trends • Assess compliance risks using internal and external data, trends and regulatory developments; recommend program modifications • Investigate suspected noncompliance with UW Medicine policies; notify affected unit heads and senior leaders; report findings; analyze trends

G. UW Medicine Compliance Code of Conduct

UW Medicine Compliance 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 compliance 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; *and*
 - billing for resident services without a documented teaching physician present when required.

The Fraud, Waste and Abuse Prevention policy (http://depts.washington.edu/comply/comp_201) 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**

UW Medicine workforce members are 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 protects 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. Comply with Professional and Ethical Standards

UW Medicine workforce members understand and apply the professional standards unique to their role and function, including the following:

- a. Staff bylaws and other entity or role-specific professionalism policies, including but not limited to the UW Professional Conduct Policy (<http://www.uwmedicine.org/about/policies/professional-conduct>);
- b. Specific requirements for disclosing and managing conflicts of interest contained in policies, guidance documents, and established procedures for each constituent group.

Regardless of constituent group, UW Medicine workforce members:

- 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.

7. Comply with Emergency Medical Treatment Rules

All care is provided in accordance with UW Medicine's Emergency Medical Treatment and Labor Act (EMTALA) policy.

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:

UW Medicine Compliance

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

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 a designated institutional official, including my supervisor or one of the offices listed in this Code.

Name (please print) _____

Signature _____

Date _____ Department/Service area _____

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