

UW Medicine Compliance Program



Compliance & Ethics Week
November 4-8, 2024

UW Medicine Compliance Oversight

- UW Medicine Compliance has oversight of healthcare compliance for the clinically integrated parts of UW Medicine (Airlift Northwest, Harborview Medical Center, UW Medical Center, UW Medicine Primary Care, UW Physicians, UW School of Medicine (including UW SoM Faculty employed at Fred Hutchinson Cancer Center), Valley Medical Center)
- Compliance functions also exist in other areas of the University and at other entities.
- UW Medicine Compliance partners with these other groups to collaborate and share information and insights.

UW Medicine Compliance Oversight Areas

- Compliance operations/Program Integrity.
- Clinical billing and documentation for hospital, professional and clinical research services.
- Patient information privacy and identity theft prevention.
- Anti-Kickback Statute (AKS), Civil Monetary Penalties Law, and Physician Self-Referral (Stark) Law.
- Conflicts of Interest and Ethics oversight related to the Washington State Ethics in Public Service Act.
- Emergency Medical Treatment and Labor Act (EMTALA)

Other University of Washington Depts with Compliance Oversight

- UW Compliance and Risk Services
- UW Finance, Planning and Budgeting
- UW Internal Audit
- UW Medicine Clinical Risk Management
- UW Animal Care and Use Program
- UW Environmental Health and Safety
- UW Office of Research
- UW Healthcare Components (e.g., Dentistry, Nursing, Public Health)

Partner Entities with Compliance Oversight

- Seattle Children's
- Children's University Medical Group
- Fred Hutch Cancer Center

Program Integrity & Compliance Operations

Karen Kranz, Director, Program Integrity

The program integrity team supports the compliance department in programmatic areas, infrastructure and operations including:



Compliance training development, delivery and reporting.



Policy and code of conduct updates.



Development of annual risk assessment, work plan and Board of Regents Report.



Intake and triage of questions and concerns.



Payor attestations and exclusion screening audits.



Administrative support including purchasing, facilities management, onboarding and exiting.



Department outreach including inter and intranet sites, newsletters, events.



Department technology systems support & management.



Department metrics development including quarterly dashboards.

Professional Billing Compliance

Ruth Perkins, Director, Professional Billing Integrity

The professional billing compliance team supports physician and advanced practice professionals (APP) in accurately documenting and billing for professional services

Audit
Physician &
APP Billing
Services for
Accuracy, and
Provide
Physician &
APP
Education

Respond to
concerns &
questions by
conducting
investigations
or providing
guidance

Respond to
Government
Audits

Develop and
Update UWP
Policies

Provide
Information
on Annual
Regulatory
Changes and
New Billing
Codes

Collaborate
with
Operational
Colleagues

Hospital Billing Compliance

Kara Clements, Director, Hospital Billing Compliance

The hospital billing compliance team is mainly responsible for:

Consultations

Consulting and answering questions regarding regulatory requirements and government payer policies for UW Medicine employees and patients.

Investigations

Investigating reported concerns to determine if we need to change processes and/or take corrective action.

Managing Audits of Medicare & Medicaid Claims

Responding to audits, appealing unfavorable findings, and working with clinical and operational departments when audits reveal opportunities for improvement.

Internal Audits

Performing audits, based on an annual risk assessment, of billing and documentation processes to ensure compliance with federal and state laws and regulations.

Patient Information Privacy

Lenny Sanchez, Director, Patient Information Privacy

The Privacy Team answers questions and conducts investigations into matters involving State privacy laws, substance use disorder records, Information Blocking regulations, and interface with other University standards (e.g., education records, University personal data, etc.)

- ❖ Can I do ____ with Patient Information?
- ❖ What type of data agreement is required?
- ❖ Must/may I share information with ____?
- ❖ How do I exercise my HIPAA privacy right to ____?

Patient
Complaints

Employee
Reported
Concerns

Regulatory
Agencies

- ❖ Did UW Medicine or its workforce violate policy?
- ❖ Did UW Medicine apply appropriate corrective actions?
- ❖ Does UW Medicine have breach notification obligations?

Lenny Sanchez
*Director, Patient
Privacy*

Sara Blagg
*Harborview Medical
Center*

Brent DeBeaumont
Valley Medical Center

David Hays
*UW Medical Center
Montlake and
Northwest*

Elizabeth Gay
*UW Medicine Primary
Care*

Special Regulatory Affairs

John Dortero, Director, Special Regulatory Affairs

The Director of Special Regulatory Affairs provides education, guidance, and routinely audits the following topics:

Conflicts of Interest (COI), Ethics

- ✓ Provide education and guidance to our workforce to ensure outside personal/financial interests do not inappropriately influence UW Medicine Job Duties
- ✓ Provide education and guidance on WA State Ethics in Public Service Act and related laws/policies regarding ethics

Emergency Medical Treatment and Labor Act (EMTALA)

- ✓ Education, guidance and routine audits across UW Medicine Emergency Departments
- ✓ Ensure UW Medicine patients are provided equal access to emergency medical care regardless of financial considerations

Research Billing Compliance

- ✓ Routine audits across the School of Medicine departments & divisions
- ✓ Education and guidance on clinical research billing regulatory rules and subtopics, including Investigational Devices (IDEs), New Drugs (INDs) and Humanitarian Use Devices

How to contact Compliance



- Compliance Hotline
 - 206.616.5248
 - 866.964.7744 toll free and anonymous
- Directly email or call department leaders
 - Contact page: [Our Department - UW Medicine Compliance \(washington.edu\)](https://www.washington.edu/compliance/our_department)
- Email
 - comply@uw.edu
- Main Office Phone
 - 206.543.3098
 - 855.211.6193 toll free

Compliance Program Mission, Vision, Values

Mission

- UW Medicine Compliance is dedicated to positively impacting the experience of those we serve through an open, collaborative, partner-driven approach to compliance. We strive to protect the rights of patients, promote ethical conduct and advance a trusted culture of compliance. We endeavor to achieve this through proactive education, guidance and monitoring of applicable laws and regulations.

Vision

- Our vision is to be a trusted and valued partner that cultivates an effective and proactive compliance culture supporting the UW Medicine community in achieving its mission of improving the health of the public through business operations with the highest standards of ethics and integrity.

Values

- Subject matter expertise with state and federal laws and regulations which forms the basis for the compliance policies that apply to all of UW Medicine.
- Integrity of business operations through alignment with compliance policies.
- Success of our workforce by providing pathways for them to comply with requirements that apply to their respective roles.
- Professional development for our team members to expand and enhance their compliance knowledge.
- Openness to learning and adapting to the rapidly changing national healthcare environment (e.g., AI, etc.).

Compliance Program Areas Summary

Compliance Program

- Collaborative partner-driven approach to compliance
- Strive to protect the rights of patients, promote ethical conduct and advance a trusted culture of compliance
- Provide consultation on the wide range of compliance issues that impact UW Medicine
- Concerns are investigated and we have a strict non-retaliation policy

Beth DeLair, Chief Compliance Officer

Program Integrity & Compliance Operations:

- Education and outreach development
- Policy and Code of Conduct management
- Intake and triage of questions and concerns
- Risk assessment and work plan development and support
- Department operations
- Data analysis and technology

Karen Kranz, Program Integrity Director

Professional Fee Billing Compliance:

- Designed to ensure billing and reimbursement practices for professional services comply with regulatory requirements
- Professional fee billing is for services performed by physicians, APP's and other ancillary services performed in freestanding clinic locations
- Manage external government audits
- Conduct internal audits
- Investigate non-compliance
- Consult and educate

Ruth Perkins, Professional Billing Director, UWP CO

Hospital Billing Compliance:

- Designed to help reduce the potential for fraud and abuse in hospital billing & coding
- Hospital billing occurs if services are performed at a hospital, medical center or outpatient clinic
- Manage external government audits
- Conduct internal audits
- Investigate non-compliance
- Consult and educate

Kara Clements, Hospital Billing Director

Patient Information Privacy Program:

- Primary source for technical expertise regarding patient information privacy related issues
- Monitor regulatory landscape (HIPAA and other federal and state laws governing patient privacy)
- Consult and educate
- Investigate non-compliance
- Conduct audits

Lenny Sanchez, Patient Privacy Director

Conflicts/Ethics of Interest, Research Billing Compliance, and EMTALA:

- Consult with School of Medicine regarding Conflicts of Interest (COI) for Faculty
- Oversight related to the WA State Ethics Act
- Research Billing Compliance Audit oversight
- Oversee EMTALA education and audits
- Investigate non-compliance
- Consult and educate

John Dortero, Special Regulatory Affairs Director

QUESTIONS?

