

CULTURE OF COMPLIANCE: UW MEDICINE ROLES AND RESPONSIBILITIES

Individual	Chairs, Directors, Managers and 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 University of Washington 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 system-wide 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