Integrity at Work

UW MEDICAL CENTER ETHICS,
STANDARDS AND COMPLIANCE

UW Medicine
UNIVERSITY OF WASHINGTON
MEDICAL CENTER
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This is your personal copy of UW Medical Center’s guide to integrity at work—our ethics, standards of conduct and compliance program. We have prepared this guide so that every person who works here will have a clear understanding of what is expected in the work environment.

This guide will help keep the medical center in full compliance with all applicable laws, regulations and policies governing our business practices. It will also help us meet expectations of regulatory agencies and the public, our administration, board of directors and related institutions who develop and maintain a compliance program to help guide business practices and the delivery of services appropriately.

Everyone associated with UW Medical Center is responsible for acting in a manner consistent with our organizational ethics statement, our compliance program and the University of Washington’s supporting policies, as well as all applicable federal and state laws and regulations.

You are an important contributor to our mission to provide exemplary patient care, to teach and to research. That’s why we ask that you take the time to carefully read and periodically review the material in this booklet. It will be useful to you as a guide to ethical and legal behavior at work. You may want to keep it in your desk or locker as a handy reference source.
Healthcare practice is a highly regulated industry functioning within and under thousands of pages of laws, rules and guidelines that are constantly being interpreted. In this complex environment, mistakes can occur. It is our intent to comply with all laws and regulations. The compliance program has been designed to help guide us.

We know that we can count on you to provide service to others that reflects our values of accountability, respect, innovation, service and excellence, and complies with all applicable ethical and legal requirements. Thank you.

Stephen P. Zieniewicz, FACHE
Executive Director, UW Medical Center
OUR MISSION

University of Washington Medical Center improves health by providing exceptional patient and family centered care in an environment of education and innovation.

OUR VALUES

At UW Medical Center, our values guide all our decisions and actions.

Accountability

Taking responsibility for our actions and their collective outcomes. Accountability is reflected in the many decisions made and actions taken every day that enhance our commitment to patient care, research and education. Accountability applies both to the staff who provide direct patient care and to those who support patient-care activities.

Respect

Valuing one another. UW Medical Center staff perform a wide range of jobs to keep the medical center functioning smoothly 24 hours a day. People in different departments need positive working relationships to ensure high-quality patient care.
Respect for each other is an essential part of maintaining cooperation and effective teamwork between individuals and departments. Respect also means that we value the privacy and confidentiality of our patients—including fellow university and medical staff members who are patients in our medical center.

**Innovation**

Using creative ways to reach our goals. Thinking creatively helps ensure that patient care here continues to be of the highest quality. Each of us can help keep UW Medical Center at the forefront of healthcare facilities by thinking of new ways to solve problems and simplify processes.

**Service**

Consistently meeting the needs of our patients, physicians, staff and the community. All UW Medical Center staff whether they provide direct patient care or support services, play an important role in serving the people who have chosen UW Medical Center for their healthcare.

**Excellence**

Always doing our best. Excellence results from each of us committing to use our intelligence, skills and compassion to do our best, all the time.
COMPLIANCE PROGRAM

Because of our commitment to ethical conduct and the laws and regulations of federal and state government, UW Medical Center administration has developed a Compliance Program. This Compliance Program embraces the prevention, detection and resolution of events and situations that are in non-compliance.

The Compliance Program is comprised of the following:

- **Employee Participation.** It is the responsibility of every employee and independent contractor to abide by applicable laws and regulations and to support UW Medical Center’s compliance efforts. All employees are required to promptly report any violation of the Compliance Program, or applicable law, as outlined in the “Reporting Your Concerns” section of this brochure.

- **Compliance Officer.** This individual is responsible for the overall implementation and operation of the Compliance Program with the medical center.

- **Compliance Committee.** Two Compliance Committees, an Executive Committee and an Operations Committee, advise and assist the Compliance Officer with implementation of the Compliance Program.

- **Employee and Vendor Screening.** Screening processes have been established to ensure that UW Medical Center does not contract with, employ or extend privileges to any individual or entity that is excluded from participation or is otherwise ineligible to participate in federal healthcare programs.
• **Employee Education.** UW Medical Center provides regular, effective education and training programs for all employees on Organizational Ethics, the Compliance Program and compliance risk issues.

• **Auditing and Monitoring.** UW Medical Center has established auditing and monitoring programs to assess the effectiveness of the Compliance Program. Department managers are responsible for building monitoring systems into day-to-day operations. The Compliance Office is responsible for conducting audits on a periodic basis.

• **Enforcement and Prevention.** Individuals violating the standards of the Compliance Program will be subject to progressive discipline, including termination, if warranted. Sanctions will be applied in accordance with relevant staff personnel policies, medical staff bylaws, and/or faculty code, as appropriate.

• **Organizational Response.** UW Medical Center will respond to all reports given by employees or others that departments or individuals may be engaging in activities that may be in violation of the Compliance Program or federal and state laws and regulations. All concerns will be thoroughly investigated. When an investigation substantiates a reported violation, the medical center administration will take all necessary actions to rectify the situation.
COMPLIANCE RESOURCES

Compliance Officer

The Compliance Officer reports to the UW Medicine Board and has primary responsibility for developing, implementing, directing, monitoring and revising the Compliance Program and compliance efforts at UW Medical Center. The Compliance Officer is responsible for investigating all complaints, reports and concerns about possible non-compliant incidents, and for directing corrective actions as appropriate. The Compliance Officer has the authority to review all documents and information relevant to compliance activities, including, but not limited to, medical records and billing records. When employees have questions or concerns about compliance-related matters, the Compliance Officer is available to respond to them.

Ethics Advisory Committee and Ethics Consultation Service

The Ethics Advisory Committee (EAC) is an interdisciplinary committee established by the medical director. The EAC advises the medical director, the associate administrator for Patient Care Services, the medical staff administrative committee and medical center staff on issues that involve ethical questions. Committee responsibilities include education, development of recommendations for hospital policy and development review of the Ethics Consultation Service process.

The Ethics Consultation Service (ECS), a function of the Ethics Advisory Committee, provides consultation services to any medical center care provider, patient, patient’s family member or loved one when an ethical concern arises in patient care. Members of this interdisciplinary group have
completed a certificate program in healthcare ethics or have advanced training in healthcare ethics.

Information about applicable state ethics laws can be found on the Executive Ethics Board Website at http://ethics.wa.gov/.

OTHER RESOURCES

Because our Compliance Program builds on existing resources and processes, we encourage you to use existing programs when appropriate.

- Medical Centers Personnel ............ 206.598.6116 (employment conditions, health and safety, discrimination, sexual harassment)
- Office of Internal Audit ............. 206.543.4028 (independent review of operating procedures and practices)
- Center for Clinical Excellence ........ 206.598.6168 (specific regulatory concerns, such as Joint Commission on the Accreditation of Healthcare Organizations)
- Risk Management ..................... 206.598.6303 (risk identification, prevention, control)
- Security ................................... 206.598.4909 (workplace violence, physical safety, theft or abuse of property)
The Federal False Claims Act (FCA) is a powerful tool for enforcing federal laws. The FCA prohibits the knowing submission of a false claim for reimbursement. While not specific to healthcare claims for reimbursement, the federal government often uses the Act to investigate and sanction providers or organizations in cases alleging fraudulent health care billing. Washington State has a law that is very similar to the Federal False Claims Act (RCW 74.09). There is also a Federal Program Fraud Civil Remedies Act of 1986 that establishes administrative remedies (monetary fines) against anyone who presents claims or written statements to the government that the person knows are false.

Although the FCA requires that the organization or provider have knowledge that he or she is submitting a false claim, the definition of knowledge is very broad and includes: (1) having actual knowledge that the information is false; (2) acting in deliberate ignorance as to the truth or falsity of the information; or (3) acting in reckless disregard of the truth or falsity of the information. The government does not have to provide a specific intent to defraud, in order to establish a false claim.

A violation of the FCA can result in significant civil penalties ($5,500 – $11,000 per claim) and damages of up to three times the amount of any overpayment based on the false claim. The civil penalties can be assessed for each false claim submitted, regardless of whether for a $25 claim or a $2,500 claim. Often the provider must enter into a Corporate Integrity Agreement with the government. The provider may also face exclusion from federal health care programs like Medicare, or even criminal prosecution.
Both the Federal False Claims Act and state law (RCW 43.70) provide protections against employer retaliation of an employee who reports fraud to the government. Under the FCA, an individual (called a “relator”) may bring a False Claims suit on behalf of the government. For example, an employee who has reported a concern to their employer and feels the issue has not been taken seriously may ultimately choose to go to the government. If the government recovers money from the provider allegedly committing fraud, the relator may receive a portion of the recovered dollars.

Examples of situations that may lead to a False Claim include:

- Unbundling or upcoding
- Billing for a service that was not performed
- Duplicate billing for the same service
- Billing for services without a documented order
- Billing for resident services without documented Teaching Physician presence

It is especially important that all UW Medicine providers and staff understand the billing rules that apply to their practice or activities. Our policies require that any employee who has a question or concern about a coding or billing practice must raise the issue or question with a supervisor, operational leader, or one of the Compliance Offices established specifically to investigate and correct inappropriate practices within the organization. In addition, you may contact the UW Medicine Compliance Hotline at 206.616.5248. For information on anonymous reporting, see page 26 of this book. You may also contact the Executive Director’s office at 206.598.6364. The Compliance Office enforces policies that prohibit retaliation against anyone who reports a concern in good faith.
UW Medical Center is dedicated to the principle that all patients, staff, faculty, volunteers, visitors and students deserve to be treated with dignity, respect and courtesy.

**Accuracy of Records**

We expect all patient and business records to be accurate and complete and retained for the periods prescribed by law and UW Medical Center policies.

Patient and business records must conform to accepted standards for the maintenance of such records and shall not contain false or misleading information. Medical records may be amended to correct an error or complete documentation only in accordance with established medical records procedures.

All financial transactions must be recorded in accordance with generally accepted accounting principles, medical center policies and procedures.

**Antitrust Laws**

UW Medical Center complies with all antitrust laws. No matter what pressures exist in today’s healthcare environment, we must never engage in business practices that could be viewed as competing unfairly.

It is unlawful to agree, or attempt to agree, with competitors to fix prices, divide geographic or service markets, or make any agreement that artificially raises the price of our services or improperly reduces competition. Special care should be taken in this regard when joint ventures or working relationships with other healthcare organizations are being considered.

Seek advice from your department head before taking any action that may compromise
compliance with antitrust laws. Department heads contacted about antitrust matters should contact the Compliance Officer at 206.543.3098 for advice before proceeding.

UW Medical Center bills only for services actually rendered, and substantiating medical documentation must be provided for all services rendered. If the appropriate documentation has not been provided, it is assumed that the service has not been rendered and no charge should be submitted or bill generated.

Services rendered must be accurately coded to ensure both proper billing and integrity of the medical database.

All billing must comply with the requirements of state, federal and private payers.

UW Medical Center will provide assistance to patients seeking to understand the charges relating to their care. Calls should be directed to Patient Financial Services at 206.598.1950.

If you have questions about facility billing, contact your department manager. If you have questions regarding professional fee billing, contact University of Washington Physicians (UWP) at 206.543.8606.

If you suspect or have reason to believe that improper billing or documentation is occurring, you should immediately alert your supervisor or a higher-level manager. In addition, you may contact the Compliance Officer at 206.543.3098 or call the Compliance Hotline at 206.616.5248 if your questions are not answered or the issue remains a concern.

Billing data must be retained for periods prescribed by law and defined by UW Medical Center policy. Staff involved in preparing and/or submitting charge or billing data must be trained in coding and documentation practices. Billing
policies and procedures must be in writing, approved by management and periodically updated.

When a payer agreement requires the collection of co-payments and/or deductible amounts, UW Medical Center will seek collection as required by the agreement. Decisions to waive any co-payment or deductible must be accurately disclosed and implemented in accordance with written policy.

Contracts with clinicians and referral sources must accurately specify the services to be provided, benefits to be received, realistic time commitments and reasonable compensation rate(s). All contracts must be reviewed prior to issuance by the Compliance Officer.

Commitment to Service

We provide a uniform standard of care and service throughout the medical center based upon the needs of our patients. We provide services that are responsive to the healthcare needs of the population served, and we deliver these services in an acceptable manner.

Confidential and Proprietary Information

There are three ethical standards that protect confidential information:

- UW Medical Center staff should not engage in outside employment, business or professional activities that might induce or require the disclosure of confidential information.
- UW Medical Center staff may not use confidential information for personal gain or benefit, or the personal gain or benefit of another.
- UW Medical Center staff may not disclose confidential information to anyone who is not authorized or entitled to receive the information.
We recognize the need to maintain patient, personnel and sensitive management information in a confidential manner. Physicians, employees, health profession students and volunteers at UW Medical Center have an ethical and legal responsibility to respect the privacy of patients. Information regarding patients, their care and their families is strictly confidential and may be shared only between persons directly involved in the patient’s care. Employees shall not obtain or release information about patients unless it is appropriate and necessary to the performance of their job responsibilities and unless applicable policies and procedures are followed. Both written and electronic patient information will be maintained in a controlled, secure and confidential manner. Oral communications about confidential patient information will occur only in a private manner. Never disclose confidential information to an unauthorized person.

Information obtained, developed or produced by UW Medical Center and its employees, and information supplied by outside consultants or vendors for the benefit of the medical center, is considered confidential and/or proprietary. This information should not be disclosed to anyone outside the medical center, including family, friends, relatives, business or social acquaintances, customers, vendors or others, unless you have specific authorization to do so in accordance with state law. Do not disclose this information to other medical center employees except on a “need-to-know” basis.

Always take reasonable steps to prevent copying or unauthorized use of copyrighted, trademarked or licensed materials and to safeguard proprietary information entrusted to UW Medical Center.
PROFESSIONAL CONDUCT

As stated in the UW Medicine Policy on Professional Conduct, UW Medical Center and UW Medicine value professionalism among its faculty, staff, trainees, and students in carrying out the UW Medical Center mission. Professionalism includes demonstrating excellence, humanism, accountability, and a commitment to altruism in all our work interactions and responsibilities. Unprofessional behavior that is disrespectful, retaliatory, or disruptive has no place in a treatment or work environment.

CONFLICT OF INTEREST

Conflicts of interest are governed by the State Ethics Law. A conflict of interest exists whenever the loyalty of an employee is divided between his or her responsibilities to the medical center and an outside interest.

You should avoid actual conflict of interest, as well as actions that appear to involve conflict of interest. If you believe such a conflict of interest may exist, it must be disclosed to your supervisor or manager before taking any action. Until you have disclosed and resolved the potential conflict with your supervisor or manager, treat the situation as if a conflict of interest does exist.

While no set of guidelines can cover every type of conflict of interest, the following address some important types:

- Do not conduct UW business with any firm in which you, your family or your close business or personal associates have a direct or indirect interest.

- Do not conduct personal business activities in your work environment, or use UW telephone numbers and addresses (including email and/
or World Wide Web addresses) or UW stationery and other office supplies for your personal or outside business.

• Do not use UW-owned computing resources and laboratory equipment to conduct an outside business.

• Do not use UW affiliations or titles in any advertising related to an outside business.

• Do not participate in the hiring or direct supervision of a family member.

• Maintain impartial relationships with actual and potential vendors and contractors. Never exert or appear to exert influence on behalf of those with whom UW Medical Center does business or may do business because of friendship or any other relationship.

• Donations to a UW Medical Center facility or program must be deposited in a UW-approved gift account and reported to the Medical Affairs Advancement Office.

• Do not endorse any product or service on behalf of UW Medical Center without prior review by the Compliance Officer.

• If you serve as a member of an outside organization or board or in public office, you must abstain from any decision or discussion affecting the medical center. Make it clear why you are abstaining. Exceptions require specific approval of the Compliance Officer.

**Conflict Resolution**

Our goal is to resolve all conflicts fairly, objectively and as close to the source as possible to obtain a mutually satisfactory resolution.

**Environmental Stewardship**

UW Medical Center has specific procedures for disposing of medical waste, environmentally sensitive materials and hazardous material. If you
are uncertain of the correct way to dispose of a material, consult your supervisor or manager for assistance.

**Gifts, Gratuities and Items of Value**

As a state employee, you should not solicit or accept gifts, gratuities or other items of value for yourself, family members, friends or associates when acceptance could influence—or could reasonably be interpreted by others as influencing—your impartiality as representatives of the state. Healthcare providers may not accept any gift from a patient that exceeds courtesy value and may never accept cash from a patient. Cash or non-cash gifts to clinicians or referral sources are prohibited.

The state’s ethics law has three standards relating to gifts:

- A gift may not be accepted if there is a reasonable expectation that your vote, judgment or action may be influenced by the gift.
- A gift may not be accepted if the gift could be a reward for the performance or non-performance of your job.
- A gift may not be accepted if its value exceeds $50 from a single source within a calendar year, or aggregate sources if used together.

**Government Investigations**

University of Washington Medical Center cooperates with legally authorized government investigations. If a UW Medical Center employee is approached by a person who identifies himself or herself as a government investigator, the employee should immediately contact the UWMC Administrator On Call (AOC) by calling the Paging Operator and asking to speak with the AOC. Tell the person taking the call that you are calling about a potential government investigation. The
AOC will help you follow proper procedures for cooperating with the investigation.

A UW Medical Center employee who receives a subpoena or other written, official governmental request for information (such as a Civil Investigative Demand) should contact the AOC via the Paging Operator, immediately, before responding to the request.

In some cases, government investigators—or persons presenting themselves as government investigators—may contact employees outside the workplace, during non-work hours or at home. Do not feel pressured to talk with the person under such circumstances without first contacting the AOC. Employees have the legal right to contact legal counsel before responding to questions by an investigator.

UW Medical Center employees must never:

• Destroy or alter any document or record in anticipation of a request for that document or record by a government agency or court.

• Lie or make false or misleading statements to any government investigator.

• Attempt to persuade any other UW Medical Center employee or any other person to provide false or misleading information to a government investigator, or fail to cooperate with a government investigation.

**Improper Use of Funds**

UW Medical Center funds may not be used for improper or illegal activities. The medical center prohibits any payment to an employee that may be viewed as a bribe, kickback or inducement—any payment or consideration of value offered in order to influence a decision on grounds not directly related to business merits.

You may not use UW Medical Center funds
to contribute to a political party, committee, organization or candidate in connection with any political campaign for public office. (Note: Personal contributions of your own funds to the campaigns of candidates or ballot initiatives of your choice as a private citizen, unrelated to your UW employment, are not prohibited.)

Marketing

We are honest, accurate and appropriate when providing information about or marketing UW Medical Center services. Our objective is to create and increase awareness of these services, stressing their value and our capabilities, always mindful of the trust that the public places in us to provide accurate information.

Our patients’ (and our potential patients’) health is our priority, and we place their good above all other interests.

Outside Employment

UW Medical Center employees may engage in outside employment, provided there is no actual, apparent or potential conflict of interest.

Outside employment should not adversely influence your independence and objectivity in making decisions, or detract from the performance of your official duties.

General ethics standards for outside employment:

• You must actually perform the work when receiving compensation from a source other than your UW Medical Center employment.

• The outside work you perform cannot be related to a contract or grant that is within your official duties for UW Medical Center or under your supervision.

• The outside work you perform must comply with UW Medical Center’s rules or policies on outside employment.
• The outside work may not be compensated by a person who provides goods and services to UW Medical Center if you participate in the acquisition of those goods and services.

• The outside work may not be related to a contract or grant that you authorized in your official capacity.

Outside employment must be reviewed for approval by each employee’s management. See http://www.washington.edu/admin/hr/forms for the Outside Work Approval form.

Patient Care

We provide impartial access to healthcare, regardless of race, creed, gender, national origin, sexual orientation, physical impairments or religious preference. We do not place any conditions on provision of care or otherwise discriminate against an individual based on whether he or she has executed an advance directive (a legal document which makes an individual’s wishes for treatment known if he or she becomes unable to communicate or make decisions).

We treat all patients with dignity, respect and courtesy. Patients and their families will be involved in decisions regarding their care to the extent that this is practical and possible. We will inform patients about therapeutic alternatives and the risks associated with the care they are seeking. We will seek to understand and respect their care preferences and objectives.

As healthcare providers upon whom patients depend, it is important for us to note errors or deficiencies, even those that may seem small or insignificant, in order to improve future care. Promptly report such matters to your supervisor, Risk Management or the Center for Clinical Excellence.
We are responsible for providing healthcare services that comply with all laws, regulations and standards, including those addressing patients' rights and those prohibiting sexual contact with patients.

Qualified individuals must assess the requirements and needs of our patients and identify appropriate services. When appropriate, we will seek input from families, medical staff and referral and payer sources.

Medical records and documentation must satisfy the requirements of medical staff bylaws, facility policies, accreditation standards and all applicable laws and regulations.

UW Medical Center supports efforts to provide effective communication, coordination of the team's activities and involvement of patients, their families and community agencies in the process of discharge planning.

We will provide care only to those patients who can be cared for safely within our facility.

If we cannot provide the appropriate care needed, we will arrange for safe, efficient transport to another medical facility where such care is available.

Protecting Our Assets

We are all responsible for protecting and preserving UW Medical Center property, equipment and supplies. Property, owned or leased, includes office and medical equipment, vehicles, supplies, reports and records, computer software and data, as well as trademarks and service marks, intellectual property, facilities and services provided by the medical center.

Each of us should be diligent in protecting and preserving the property of others, including our patients, visitors, healthcare providers and support staff, students and volunteers. We also should
protect proprietary information entrusted to us by actual and potential vendors, referral sources, contractors, service providers and others.

Disposal of public property is governed by state law. Follow medical center policies for proper disposal of surplus or obsolete property.

**Use of State Resources**

The conservation of state resources—including employees and their time, funds, facilities or other property—is a responsibility that UW Medical Center staff, as state employees, hold as trustees for the people of Washington state.

State resources may not be used personally for an individual's benefit or gain, or for the personal benefit or gain of others. (Personal benefit or gain may include a use for personal convenience or a use to avoid personal expense.)

State resources may be used for personal purposes on a limited, occasional basis if all of the following qualifications are met:

- there is no cost to the state
- the use does not interfere with official duties
- the use is brief in duration
- the use does not disrupt or distract from the conduct of state business
- the use does not compromise the security or integrity of state information or software
- the employer determines, prior to the use, that the use enhances organizational effectiveness or the employee’s job-related skills.

State resources may never be used for the following:

- to conduct an outside business
- to campaign or for political purposes
- for commercial uses, advertising, or selling
• for illegal activities
• to support, promote or solicit for an outside organization or group, unless approved in advance by the agency head or designee.

Consumable state resources (for example, paper, envelopes, spare parts) may never be used for personal purposes.

Work Environment

UW Medical Center is committed to providing a safe and healthy workplace, and to the privacy, security and comfort of its patients. If you observe any practice or condition that may not meet our policies and procedures or any law, standard or regulation, promptly report this to your supervisor, manager or an appropriate UW Medical Center authority.

We expect our employees to uphold all policies, procedures, laws, regulations, standards and practices intended to make the treatment and work environment healthy and safe.

Drugs and pharmaceuticals must be safely stored and inventoried, and any missing supplies must be promptly reported.

Every supervisor and manager has a responsibility to create a work environment in which legal or ethical concerns can be raised without fear of retribution or retaliation.

Employees are expected to observe the standards of their profession and exercise good judgment. Significant differences of opinion in professional judgment should be promptly referred to the supervisor, manager or appropriate medical center authority.

UW Medical Center employees are encouraged to treat one another in a fair and respectful manner. The medical center prohibits discrimination on the basis of race, color, religion, gender, sexual
orientation, national origin, age, disability, veteran status or any characteristic protected by law. All employment-related decisions will reflect this commitment.

Sexual harassment is a violation of the University of Washington’s human rights policy. It is defined as: (1) the use of an individual’s authority or power, either explicitly or implicitly, to coerce another person into unwanted sexual relations or to punish another for his or her refusal; or (2) the creation by a member of the UW community of an intimidating, hostile or offensive working or educational environment through verbal or physical conduct of a sexual nature.

The UW has been very successful in resolving sexual harassment complaints and has designated special people to help—call the University Ombudsman and Ombudsman for Sexual Harassment at 206.543.0283 or 206.543.6028, or the University Complaint Investigation and Resolution Office at 206.616.2028. A thorough investigation will be carried out that protects the rights of both the person complaining and the alleged harasser.

DISCIPLINARY PROCESS

Individuals violating these standards will be subject to progressive discipline, including termination, if warranted.

These sanctions will be applied in accordance with relevant University of Washington staff personnel policies, UW medical staff bylaws, and/or the UW faculty code, as appropriate.

Other disruptive behavior has no place in a treatment or work environment. Disrespectful language, name calling, bullying and intimidation are all unacceptable.
REPORTING YOUR CONCERNS

The Compliance Officer is not the only person responsible for compliance at UW Medical Center. It is critical that all employees understand that they each share in this responsibility. It is the responsibility of every employee to abide by applicable laws and regulations and to support UW Medical Center’s compliance efforts. All employees are required to promptly report any potential violation of the Compliance Program, medical center policy and procedures, or applicable state or federal laws.

The following options are available:

• Talk to your supervisor or manager.

• Contact the Compliance Officer ..... 206.543.3098

• Contact the Executive Director....... 206.598.6364

• Call the Compliance Hotline ........ 206.616.5248

This telephone hotline is available to all employees, physicians and volunteers of UW Medical Center. You may call the Compliance Hotline with questions concerning ethical or legal conduct, or to report any action you believe is improper. If you prefer, you may call anonymously. Calls to the Compliance Hotline are not traced.

• Use the medical center Suggestion Box.

Located in the Plaza Café, this alternative offers you the option of remaining anonymous, if you choose, to raise a question, concern or opportunity for improvement.

UW Medical Center policy strictly forbids any form of retaliation against anyone who, in good faith, reports a potential violation, raises a concern or asks a question.
Whistleblower Provisions and Protection

The “Whistleblower Act” was enacted to encourage employees of the State of Washington to report improper governmental actions. “Improper governmental action” means any action by an employee undertaken in the performance of the employee's official duties which:

- Is a gross waste of public funds or resources; or
- Is in violation of federal or state law or rule if the violation is not merely technical or of a minimum nature; or
- Is of substantial and specific danger to the public health or safety; or
- Is a gross mismanagement of funds; or
- Prevents the dissemination of scientific opinion or alters technical findings without scientifically valid justification, unless state law or a common law privilege prohibits disclosure.

Improper governmental action does not include personnel actions for which other remedies exist.

Assertions of improper governmental action must be filed in writing with the State Auditor's Office or the following designated University officials:

- President
- Provost
- Chancellor, UW, Bothell
- Chancellor, UW, Tacoma
- Vice President, Human Resources
- Executive Director, Internal Audit
- Executive Director, Harborview
- Executive Director, UWMC
- Associate Vice President/Chief Compliance Officer, UW Medicine
The identity of the whistleblower is kept confidential. The law protects whistleblowers from reprisal or retaliatory action.

A more detailed summary of the Whistleblower Act and methods of transmitting whistleblower assertions are contained in the Administrative Policy Statements at http://www.washington.edu/admin/rules//APS/47.01.html.

**State Government Efficiency Hotline**

State law requires the State Auditor's Office (SAO) to establish a toll-free telephone line that is available to public employees and members of the public to:

- recommend measures to improve efficiency in state and local government,
- report waste, inefficiency, or abuse,
- report examples of efficiency or outstanding achievement by state and local agencies, public employees, or persons under contract with state and local agencies.

The hotline can be reached by:

**Telephone:** 1.866.902.3900  
**Web site:** www.sao.wa.gov  
**Mail:** State Auditor's Office, Attn: Hotline  
P.O. Box 40031, Olympia, WA 98504

**ACKNOWLEDGMENTS**

Sources for this booklet include University of Washington Medical Center's Administrative Policies and Procedures, Compliance Program, Staff Bylaws, the University Handbook and the Revised Code of Washington, Chapter 42.52.

We thank Providence Health System for allowing us to use their Providence Integrity booklet as a model.
By my signature below, I attest that I have read Integrity at Work and had an opportunity to ask my supervisor questions about its content.

Date

Employee's name (please print)

Employee's signature

UWMC department / service area

After signing this form, please give it to your supervisor.
The form will be kept in your personnel file.
As a regional and national healthcare leader, UW Medicine's system of care includes:
Harborview Medical Center, Northwest Hospital & Medical Center, Valley Medical Center, UW Medical Center, UW Neighborhood Clinics, UW Physicians, UW School of Medicine, and Airlift Northwest

Access
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