

# UW Medicine Compliance Code of Conduct

## Preamble

UW Medicine<sup>1</sup> is committed to the highest standards of excellence and integrity in advancement of its mission to improve the health of the public. Each individual and every entity within UW Medicine strives to embody excellence and integrity, and seeks to contribute to a culture of quality, compliance, safety and ethical business practices. Members of UW Medicine are committed to treating everyone with respect, courtesy, dignity and professionalism without discrimination on the basis of classifications protected under UW Executive Order 31: <https://www.washington.edu/admin/rules/policies/PO/EO31.html> as well as federal, state and local nondiscrimination laws.

The UW Medicine Compliance Program encompasses a set of policies and guidance that define the scope of the program and establish related requirements and expectations for UW Medicine workforce members<sup>2</sup>. These materials are posted online at <http://depts.washington.edu/comply/policies>. This Compliance Code of Conduct (Code) is intended to ensure consistent standards of conduct throughout UW Medicine. While the Code does not address every issue that may arise, it outlines the basic principles of the Compliance Program and provides contact information for making inquiries or reporting concerns.

Each UW Medicine workforce member is responsible for reviewing, understanding and personally upholding this Code. Actions or behaviors that do not align with the principles outlined in this Code may subject an individual to appropriate disciplinary or corrective action in accordance with the policies applicable to the workforce member's specific position and work site.

The Code is built on the shared values and principles embodied in the UW Medicine Policy on Professional Conduct (Professionalism Policy) <https://www.uwmedicine.org/about/policy-on-professional-conduct>, which outlines behavioral expectations that extend beyond the scope of the Compliance Program. The Code relates to, but is not intended to replace, the Professionalism Policy.

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<sup>1</sup> UW Medicine is an integrated clinical, research and learning system with a single mission to improve the health of the public. This policy applies to the UW Medicine workforce and also those employees in shared services and the UW Medicine central leadership who support the clinical operation of UW Medicine. The clinically integrated parts of UW Medicine consist of the following:

- Airlift Northwest
- Fred Hutchinson Cancer Center (\* Please note, the UW Medicine Compliance Program and this document apply to UW faculty. Fred Hutch employees who are not also UW faculty are required to comply with Fred Hutch compliance policies only.)
- Harborview Medical Center
- UW Medical Center
- UW Medicine Primary Care
- UW Physicians
- UW School of Medicine
- Valley Medical Center

<sup>2</sup>For the purposes of the Code of Conduct, "workforce member" is defined as an employee, trainee, volunteer or role-specific contractor whose performance is under the direct control of a clinically integrated part of UW Medicine.

## The Compliance Code of Conduct

### 1. **Abide by all Laws, Regulations, Policies, Procedures and Standards**

UW Medicine is committed to following applicable state and federal laws and regulations and maintaining the highest ethical standards for the conduct of its academic, clinical, research and business affairs. UW Medicine workforce members must conduct themselves in a way that is legal, ethical and in compliance with applicable institutional policies that are designed to implement federal and state laws and regulations. UW Medicine strives to produce clear guidance, but individuals are responsible for understanding and adhering to rules that apply to their specific roles. Workforce members should seek clarification from their supervisors and/or UW Medicine Compliance when they have questions about their obligations.

### 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 laws and rules, including, but not limited to, the federal and state False Claims Acts and Medicare/Medicaid rules. UW Medicine is committed to charging, billing and submitting claims for reimbursement only for services actually rendered, documented timely and completely in the medical record, and coded in the manner required by applicable laws and regulations.

The False Claims Act governs documentation, coding and billing for patient care services. Individuals involved in these activities are expected to provide true, complete and accurate information to support every claim for reimbursement and to report suspected noncompliance.

### 3. **Provide the Highest Quality of Care**

UW Medicine is committed to providing the highest quality, safest, medically necessary, and most effective, efficient care to patients. Patients and their families are treated with utmost compassion and respect. Care is provided in accordance with the Emergency Medical Treatment and Labor Act (EMTALA), and the related policies and clinical standards established for each healthcare entity within UW Medicine.

### 4. **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 workforce members 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.

### 5. **Protect Patient Privacy**

UW Medicine has specific responsibilities to protect patient confidentiality and ensure the privacy and security of protected health information (PHI). In accordance with UW Medicine Compliance Patient Information Privacy policies, UW Medicine workforce members 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 concerns to UW Medicine Compliance about the access, use or disclosure of PHI.

6. **Ensure Data Security**

UW Medicine is committed to protecting the confidentiality of sensitive information, including patient, restricted, proprietary, research and student information. Workforce members who are given access to sensitive information are responsible for keeping data secure. This includes taking measures necessary to ensure the physical and electronic security of information used or acquired in the performance of assigned duties, regardless of its form, location or method of transmission; understanding the policies that apply to specific types of information; and seeking clarification when questions about requirements arise. In addition, we are committed to honesty and transparency in disclosing our use of patient data and relevant third-party business and research relationships.

7. **Appropriate Use of UW Medicine Resources and Assets**

UW Medicine resources and assets, including finances, equipment, human resources, facilities and technologies (including UW email accounts) are entrusted to workforce members during the course of their work and must be used responsibly and appropriately. UW Medicine is a complex organization – most workforce members are governed by the Washington State Ethics in Public Service Act (Ethics Act), while the remainder are governed by entity-specific policies regarding the use of resources and assets. However, all workforce members should understand the restrictions and responsibilities relevant to their specific role and site of service, and seek clarification if they have questions.

8. **Avoid Potential and Actual Conflicts of Interest**

UW Medicine workforce members may encounter situations which present potential or actual conflicts of interest (COI). COI may occur when a UW Medicine workforce member engages in outside activities or personal interests that influence (or appear to influence) their ability to perform or make objective decisions within their job responsibilities. A conflict of interest may also exist if the demands of any outside activities hinder or distract a workforce member from the performance of their job, or result in UW Medicine resources or assets being used for non-UW Medicine purposes. While the Ethics Act and related entity-specific policies, procedures, and guidance documents establish the requirements for avoiding, disclosing and managing COI for each constituent group, workforce members must adhere to the following basic principles:

- a. Avoid situations that may constitute COI, including but not limited to:
  - conducting UW Medicine business with entities in which a workforce member or their family member has a direct or indirect interest;
  - soliciting or accepting gifts from patients or vendors;
  - paying or accepting payments that may be viewed as a bribe, kickback or inducement.
- b. Acquire the appropriate approvals for any outside work performed.

9. **Maintain Accurate and Timely Records**

UW Medicine is committed to the maintenance of accurate and timely records, recognizing the importance of documentation in the provision of healthcare, the performance of academic and research activities, and the administration of financial and business affairs. Medical staff bylaws, organizational policies and other institutional procedures establish documentation requirements for patient health records, including timely documentation standards as well as procedures for amending records. The chief financial officer establishes UW Medicine requirements for financial transactions. Finally, the University of Washington (UW) and UW Medicine Records Retention Policies or other applicable entity-specific policies establish records management, retention and destruction requirements.

**10. Cooperate with Government Investigations**

UW Medicine appropriately responds to government investigations as required by law. UW Medicine workforce members follow applicable entity procedures including those related to responding to a subpoena, search warrant or other similar document related to an investigation of UW Medicine business, research or clinical practices, or discussing the matter with an investigator.

**Policies and Guidance**

All UW Medicine Compliance Program policies, guidance and related materials can be found at the UW Medicine Compliance web site: <http://depts.washington.edu/comply/>. The site is searchable and includes links to other resources, content-specific policies, entity-based policies and additional standards of conduct that apply to certain constituents.

CUMG Compliance Program policies, guidance and related materials can be found on CHILD, the Seattle Children's Intranet site (SCH login required).

**Contact Information for Inquiries and Concerns**

Anyone who becomes aware of an actual or potential violation of the law or of UW Medicine compliance policies has a duty to report it. UW Medicine prohibits retaliation against workforce members or other individuals for filing a complaint, expressing a concern or asking for advice. Seek assistance and report any concerns 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](mailto:comply@uw.edu)

*Address:* 850 Republican Street, Building C, Box 358049, Seattle, WA 98195-8049

*Website:* <http://depts.washington.edu/comply/>

**\* If you are reviewing the Code as part of your new hire or annual compliance training in the Learning Hub, the attestation in the module replaces this signed attestation.**

### **Attestation**

By my signature below, I attest that I have read the UW Medicine Compliance Code of Conduct and understand that I am personally responsible for upholding it.

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.