

Applicability:	UW Medicine ¹ and UW Medicine Affiliated Covered Entity ²
Policy Title:	Compliance Auditing and Monitoring
Policy Number:	COMP.003
Superseded Policies:	N/A
Date Established:	July 26, 2010
Date Effective:	January 30, 2023
Next Review Date:	January 30, 2026

PURPOSE

This policy establishes baseline requirements for auditing and monitoring activities conducted in support of the [UW Medicine Compliance Program](#), and applies to the UW Medicine compliance department.

DEFINITIONS

See [UW Medicine Compliance Glossary](#).

POLICY

UW Medicine Compliance develops and maintains annual auditing and monitoring plans based on an assessment of the compliance requirements within its specific scope and jurisdiction. Factors that contribute to the likelihood and impact of noncompliance and enforcement are considered in determining audit priorities, and audit plans are approved by the appropriate governance body. UW Medicine compliance audits are performed by staff or contractors who are subject matter experts and have scope and jurisdiction in the following areas:

¹ 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 policy 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

² The University of Washington (UW) is a hybrid covered entity under HIPAA, comprised of healthcare and non-healthcare components. For the purposes of HIPAA, the UW has designated healthcare components, and further designates a group of healthcare components to be one affiliated covered entity known as UW Medicine Affiliated Covered Entity (UW Medicine ACE). Healthcare components of the UW Medicine ACE are represented in [101.G1 University of Washington \(UW\) HIPAA Designation – UW Medicine – Affiliated Covered Entity](#).

- Facility and professional billing integrity
- Emergency Medical Treatment and Active Labor Act (EMTALA)
- Health Insurance Portability and Accountability Act (HIPAA) and State patient information privacy laws
- Research billing
- Other compliance audits as deemed necessary by regulatory need and risk assessments

Annual compliance audit plans are reprioritized periodically in response to emerging risks. They are communicated to the appropriate stakeholders and coordinated with other departments to avoid duplication of efforts.

Compliance audits conform to the procedures established for each subject area regarding initiation, notifications, review of results, documentation requirements, reporting of outcomes and remediation management.

UW Medicine Compliance analyzes audit outcomes to identify trends, evaluates remediation effectiveness and determines the need for program enhancements. This information is reported to the appropriate leadership and compliance committee(s).

UW Medicine Compliance responds to noncompliance identified during audits in an effective and timely manner, including, but not limited to the following steps:

- 1) Stop the noncompliant activity;
- 2) Assess reasons for and results of noncompliant activity;
- 3) Report noncompliance to relevant leadership and oversight bodies;
- 4) Notify external government entities in accordance with regulatory requirements;
- 5) Recommend actions to improve compliance and/or correct deficiencies;
- 6) Coordinate effective and meaningful management responses;
- 7) Provide targeted education and outreach;
- 8) Repay or otherwise remediate any overpayment;
- 9) Verify that remediation activities have been successfully deployed; *and*
- 10) Re-audit to ensure that the remediation has been successful.

REGULATORY/LEGISLATION/REFERENCES

- United States Sentencing Commission, Guidelines Manual, §8B2.1 (Nov. 2018).
- Compliance Program Guidance for Hospitals, 63 Fed. Reg. 8987 (February 23, 1998).
- Supplemental Compliance Program Guidance for Hospitals, 70 Fed. Reg. 4858 (January 31, 2005).

PROCEDURE ADDENDUM(S) REFERENCES/LINKS

[UW Medicine Compliance Glossary](#).

APPROVALS

/s/ Beth DeLair
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2/16/2023
Date