

Applicability:	UW Medicine ¹ and UW Medicine Affiliated Covered Entity ²
Policy Title:	Reporting and Non-Retaliation
Policy Number:	COMP.004
Superseded Policies:	PP-05 Complaints and Incidents Related to Privacy and Information Security ALNW, 1102 Complaint and Concern Reporting HMC, 135.14 Compliance Reporting and Hotline NWH, Compliance Issue Reporting NWH, Compliance Issue Resolution UWMC, 15-4 Employee Participation and Reporting UWNC, Compl008 Employee Participation and Reporting UWNC, Compl005 Non-Retaliation UWP, C-007 Reporting and Non-Retaliation
Date Established:	October 11, 2017
Date Effective:	January 30, 2023
Next Review Date:	January 30, 2026

PURPOSE

The purpose of this policy is to help prevent, detect and deter noncompliance by requiring all workforce members to report conduct, incidents or practices that may violate UW Medicine compliance policies or related state and federal laws and regulations, and prohibiting retaliation against individuals who make good faith reports.

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 the Health Insurance Portability and Accountability Act of 1996 (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](#).

DEFINITIONS

See [UW Medicine Compliance Glossary](#).

POLICY

I. Reporting

A. Duty to Report

All workforce members shall promptly report potential or suspected violations of UW Medicine compliance policies or other compliance concerns through the appropriate reporting channels.

B. Reporting Channels

Suspected noncompliance may be reported through a workforce member's chain of command, to a designated entity representative, to the appropriate compliance department(s), or to the UW Medicine Compliance Hotline.

All levels of management encourage and welcome reporting through any of the channels outlined in the preceding paragraph.

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

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

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

Compliance concerns may also be reported to external agencies (see external resource links below).

C. Institutional Response to Reported Concerns

UW Medicine responds to compliance concerns in a timely manner, takes reasonable precautions to maintain the confidentiality and anonymity of the reporter upon request and follows established policies and procedures for compliance investigations (see [COMP.005 Compliance Investigations](#)).

D. Self-Reporting

Workforce members may self-report their own conduct when they suspect it violates compliance policies. Self-reporting does not exempt an individual from corrective actions but will be taken into consideration when corrective actions are required (see [COMP.006 Corrective Actions](#)).

II. Non-Retaliation

- A. UW Medicine prohibits retaliation against workforce members or other individuals for good faith reporting of compliance concerns. Individuals suspected to have engaged in or condoned retaliatory conduct, harassment or retribution are subject to timely investigation and, if substantiated, appropriate corrective action, up to and including, termination. Workforce members who witness or experience retaliatory conduct should report it to UW Medicine Compliance.

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).
- Employee Education About False Claims Recovery, Deficit Reduction Act of 2005 § 6032 (codified at 42 U.S.C. § 1396a(a)(68)).
- Relief from Retaliatory Actions, Federal False Claims Act, 31 U.S.C. §3730(h).
- Refraining from Intimidating or Retaliatory Acts, 45 C.F.R. § 164.530(g).

PROCEDURE ADDENDUM(S) REFERENCES/LINKS

- [UW Medicine Compliance Glossary](#).
- [COMP. 107 Information Security Policy](#)

External Reporting Options:

- **Washington State Auditor's Office or other designated public official listed in UW Administrative Policy 47.1:** <http://www.washington.edu/admin/rules/policies/APS/47.01.html>.
Available only to Washington state employees for reporting suspected improper governmental actions.
- **Office for Civil Rights (OCR):** <http://www.hhs.gov/ocr/privacy/hipaa/complaints/index.html>.
Available to anyone for reporting suspected violations of the Privacy, Security or Breach Notification Rules by a covered entity or business associate.
- **Office of the Inspector General (OIG):**
<https://oig.hhs.gov/fraud/report-fraud/before-you-submit/>.
Available to anyone for reporting certain healthcare-related complaints involving suspected fraud, waste or abuse.

APPROVALS

/s/ Beth DeLair
Beth DeLair
Chief Compliance Officer, UW Medicine
Associate Vice President for Medical Affairs, UW

2/16/2023
Date