

Applicability:	UW Medicine ¹ and UW Medicine Affiliated Covered Entity ²
Policy Title:	Corrective Actions
Policy Number:	COMP.006
Superseded Policies:	PP-06 Corrective Actions for Noncompliance with Privacy and Information Security Policies HMC, 135.3 Compliance Program Investigations, Enforcement and Prevention HMC, 135.15 Compliance Corrective Actions and Sanctions VMC, Corporate Compliance Issue Remediation Policy & Procedure VMC, Corporate Compliance Corrective Action Policy & Procedure UWMC, 15-9 Organizational Response UWNC, Compl011 Organizational Response to Compliance Violations UWP, C-012 Corrective Action
Date Established:	October 11, 2017
Date Effective:	July 16, 2021
Next Review Date:	July 16, 2024

PURPOSE

This policy obligates UW Medicine to address compliance violations with appropriate and timely corrective actions. It applies to all designated institutional officials in UW Medicine who have responsibility for enforcement, discipline and corrective actions. This includes leaders, managers, chairs, supervisors, disciplinary boards and councils, and constituent-specific officials (for example, residing in human resources, academic personnel, graduate medical education, student affairs, etc.).

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](#).

For specific procedures related to corrective action for violations related to billing for professional services, please see [UWP Compliance Corrective Action Standard Operating Procedure](#).

DEFINITIONS

See [UW Medicine Compliance Glossary](#).

POLICY

All findings of noncompliance established by staff in the Compliance Department with scope and jurisdiction over the issue³ result in the application of appropriate corrective actions, by a designated institutional official,⁴ involving one or more of the following:

- Required/appropriate notifications;
- Process improvements;
- Claim corrections;
- Repayments;
- Changes to the terms and conditions of a workforce member's relationship with UW Medicine:
 - Disciplinary actions or sanctions, up to and including termination of the workforce member's relationship with UW Medicine;
 - Changes in staffing;
 - Contract termination;
- Issuance of an advisory;
- Re-education and training; *and/or*
- Other appropriate corrective action.

Designated institutional officials consider the following factors in determining what corrective actions are appropriate for workforce members:

- Prior violations and sanctions;
- The nature, severity and extent of the violation;
- Whether the violation is a result of conduct that is intentional, willful or with reckless disregard for the law;
- Terms and conditions of the workforce member's relationship with UW Medicine, as determined by constituent-specific policies, state regulations, conduct codes and applicable guidelines; *and*
- Whether or not the violation was self-reported (self-reporting does not exempt a workforce member from corrective action but will be taken into account).

Designated institutional officials maintain all documentation associated with corrective actions in accordance with UW Medicine constituent-specific record retention policies.

³ See [COMP.005 Compliance Investigations](#).

⁴ Violations of federal or state laws may also be subject to criminal prosecution, fines, imprisonment and/or exclusion from participation in federally sponsored healthcare programs.

REGULATORY/LEGISLATION/REFERENCES

- United States Sentencing Commission, Guidelines Manual, §8B2.1 (Nov. 2016).
- 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).

PROCEDURE ADDENDUM(S) REFERENCES/LINKS

- [UW Medicine Compliance Glossary](#).
- NWH, 75.08 Corrective Action/Discipline.
- [UWP Compliance Corrective Action Standard Operating Procedure](#).

APPROVALS

/s/ Beth DeLair

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

11/27/2023

Date