

APPENDIX

UW MEDICINE

COMPLIANCE PROGRAM

February 2020

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I. INTRODUCTION

UW Medicine is a complex organization consisting of seven owned or managed entities that operate in a highly regulated environment with a variety of compliance requirements and potential risks. The culture of compliance at UW Medicine is characterized by four major elements:

- A formal structure with executive leadership engagement and support and advisory board oversight;
- System-wide education and outreach;
- Formal channels of communication including a system-wide reporting hotline; and
- A set of clearly defined responsibilities and documented formal program activities designed to promote and support compliance and detect noncompliance

I am pleased with the culture of compliance we have developed and instilled at UW Medicine over the past 15 years. Guided by the advice and oversight of the UW Medicine Compliance Committee, the UW Medicine management team provides substantial leadership support for the compliance function. I am confident in the quality and subject matter expertise of UW Medicine Compliance in proactively identifying potential areas of compliance risk and developing policies and corrective action plans that mitigate those risks. The active engagement of our administrative teams with the UW Medicine Compliance Committee is essential for the maintenance and ongoing improvement of an effective compliance program. It is a privilege for me to work with the team of individuals who are committed to excellence in our compliance program.

Paul G. Ramsey, M.D. CEO, UW
Medicine
Executive Vice President for Medical Affairs and Dean of
the School of Medicine,
University of Washington

II. UW MEDICINE

The UW Medicine enterprise includes the following owned or managed entities:

- Harborview Medical Center(HMC)
- Valley Medical Center(VMC)
- UW Medical Center(UWMC)
- UW Neighborhood Clinics(UWNC)
- UW Physicians(UWP)
- UW School of Medicine(SoM)
- Airlift Northwest(ALNW)

UW Medicine is an “affiliated covered entity” under the federal Health Insurance Portability and Accountability Act (HIPAA). For the purposes of HIPAA compliance, the UW Medicine Compliance Program has jurisdiction over the healthcare components of the University of Washington (UW) in UW Medicine, as well as additional entities that are collectively referred

to as the UW Medicine Affiliated Covered Entity (UW Medicine ACE). These entities are listed in the UW HIPAA Designation (see Attachment A); the HIPAA compliance program governance structure for the UW Medicine ACE is represented in Attachment B.

UW Medicine shares in the ownership and governance of Children’s University Medical Group (CUMG), a pediatric practice plan founded with Seattle Children’s Hospital (Children’s); and the Seattle Cancer Care Alliance (SCCA), founded with Children’s and the Fred Hutchinson Cancer Research Center (FHCRC).

UW Medicine’s mission is to improve the health of the public by advancing medical knowledge, providing outstanding primary and specialty care to the people of the region, and preparing tomorrow’s physicians, scientists and other health professionals.

III. OVERVIEW

A. Purpose

The purpose of the UW Medicine Compliance Program (Program) is to assist UW Medicine in achieving its financial, operational and strategic goals while maintaining compliance with all applicable healthcare laws and regulations. The scope, structure, core functions and activities of the Program are updated as necessary to reflect organizational and policy changes, programmatic refinements and best practices for addressing compliance risk.

B. Scope

The following content areas are within the scope of the Program:

- Compliance Operations/Program Integrity
- Clinical billing and documentation (facility and professional fee billing for all clinical services including clinical research);
- Information security, privacy and identity theft prevention;
- Stark law and Anti-Kickback Statute (AKS);
- Conflicts of interest (COI);
- Ethics; and
- EMTALA

Compliance programs for other content areas (for example, research, health and safety, pre- and post-award research grants and contracts, employment), other entity partners (for example, SCCA, FHCRC, Children’s), or UW healthcare components (for example, Dentistry, Public Health, Nursing) are within other jurisdictions.

However, UW Medicine Compliance collaborates with its external entity partners and other parts of the UW system for any number of reasons, including but not limited to:

- Addressing compliance issues crossing institutional or jurisdictional lines;
- Enforcing compliance;
- Harmonizing policies, procedures and guidance;
- Engaging in mutually beneficial initiatives, process improvements and risk

- assessments;
- Sharing best practices;
- Monitoring regulatory developments, analyzing industry trends; *and*
- Identifying and implementing risk mitigation strategies.

C. Program Elements

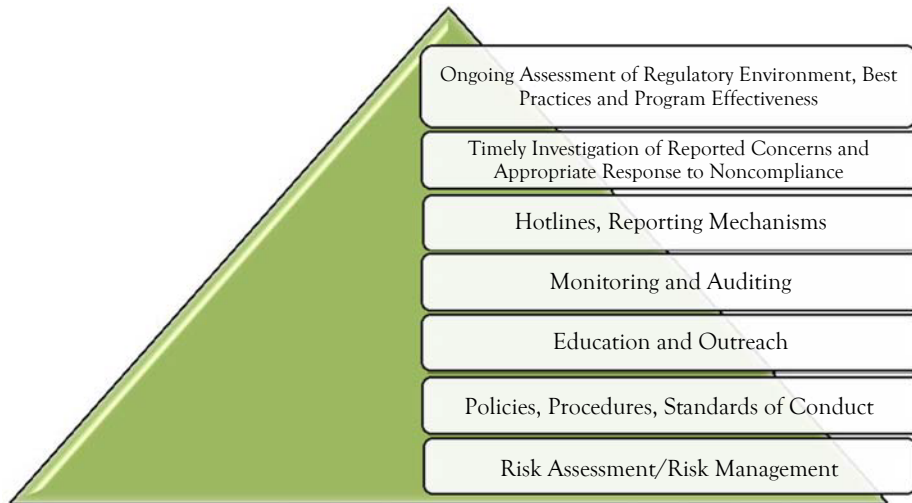
The Program is founded on both risk-based and proactive core components designed to promote and support compliance and detect noncompliance. Activities and program elements are documented in writing, readily available for review and regularly reported.

Specific program elements are aligned with standards established by the federal Department of Health and Human Services Office of Inspector General (OIG), the Office for Civil Rights (OCR) for HIPAA Privacy and Security Rules, and the United States Federal Sentencing Guidelines, and include:

- Senior leadership commitment and operational, executive-level and advisory compliance oversight committees;
- Designation of a chief compliance officer who:
 - Reports directly to the chief executive officer;
 - Has responsibility for overseeing UW Medicine compliance systems and initiatives; *and*
 - Serves as chief privacy official for the UW Medicine ACE with responsibility for developing and implementing policies and procedures required under HIPAA.
- Standards, including a Code of Conduct and policies and procedures to prevent and detect violations of law, and to protect and safeguard protected health information (PHI);
- Internal controls to identify and mitigate compliance risk;
- Education and outreach activities to ensure that policies are effectively disseminated and understood by enterprise and UW Medicine ACE members;
- Documented development and implementation of risk mitigation strategies and work plans, and timely reporting to executive and board-level compliance committees;
- Internal monitoring and auditing;
- Reasonable due diligence to confirm that UW Medicine does not delegate substantial discretionary authority to individuals who the organization knows or should know, are likely to engage in illegal conduct;
- Maintaining lines of communication, including an anonymous reporting mechanism for employees to report possible compliance issues without fear of retaliation;
- Prompt investigation of reported concerns, including noncompliance with enterprise policies, suspected overpayments, privacy complaints and security incidents involving PHI;
- Effective management of noncompliance, overpayments, complaints and

incidents to meet the timelines and requirements established by regulators for repayments, disclosure and breach notifications;

- Appropriate corrective action to reduce the impact and minimize the risk of similar future offenses and incidents;
- Enforcement of standards and policies through well-publicized disciplinary guidelines; *and*
- Periodic evaluation of the effectiveness of the Program.



IV. PROGRAM STRUCTURE

A. Compliance Oversight

1. Executive Leadership

The chief executive officer, UW Medicine, executive vice president for medical affairs, and dean of the School of Medicine, University of Washington (CEO/EVPMA/Dean), provides compliance leadership and support. The CEO/EVPMA/Dean delegates specific responsibilities to key senior leadership positions.

2. Enterprise and UW Medicine ACE Compliance Leadership

The chief compliance officer, UW Medicine, and associate vice president for medical affairs, University of Washington (CCO/AVPMA), is accountable to the CEO/EVPMA/Dean for leadership of UW Medicine’s compliance systems and initiatives and is the designated policy owner for all enterprise and UW Medicine ACE-level compliance policies. The CCO/AVPMA has a direct relationship with the UW Medicine Compliance Committee, serving as the chief staff person for the Committee, and with the Office of the President of the University. The CCO/AVPMA is a member of UW Medicine’s senior leadership team (see Attachment C for job description).

B. Compliance Committees

1. Enterprise-Level/UW Medicine ACE Committees

The scope, purpose and composition of the compliance committees are summarized in Attachment D.

a) UW Medicine Compliance Committee (UWMCC)

The UWMCC is responsible for reviewing and evaluating the Program and preparing the Chair to advise the UW Board of Regents, the UW president and the CEO/EVPMA/Dean regarding the implementation and effectiveness of the Program. Section E(3)(iv) of the Board of Regents Governance Standing Orders requires CEO of UW Medicine and the Chief Compliance Officer to appear before the Board of Regents to report on UW Medicine compliance programs. An annual report includes but is not limited to, the following topics:

- Key compliance policies and issues;
- Status of the compliance program infrastructure and reporting relationships;
- Scope of authority of key positions;
- Current assessment of compliance risks; *and*
- Level of resources dedicated to the compliance programs.

b) UW Medicine Compliance Governance Group (CGG)

Chaired by the CEO/EVPMA/Dean or designee, the steering committee of this group meets regularly for the purpose of strategic planning and problem solving, risk assessment decision-making and policy approval. Members include UW Medicine vice presidents, the CCO/AVPMA, the Vice Dean for Administration and Finance, UW Medicine Strategic Business Officer, the Senior Director for Clinical Affairs and issue-specific participants as needed.

c) UW Medicine Compliance Oversight and Implementation Steering Committee (COISC)

The COISC is chaired by the CCO/AVPMA and is primarily responsible for overseeing implementation of compliance program activities and internal controls throughout the organization. Members include entity executive directors, SoM vice deans, the chief information officer, compliance directors and major organizational stakeholders.

2. Practice Plan Compliance Committees

The boards of UWP and CUMG have established physician-led compliance committees. The UWP Compliance Committee and the CUMG Physician Education, Billing and Compliance Committee work closely with practice plan compliance officials in developing and implementing compliance policies, establishing effective training strategies, and advising their respective boards. Each committee has a formal charter and generally meets monthly. All official committee records are maintained by compliance officials.

3. Compliance Communication Venues

The size and complexity of the UW Medicine structure and its many interfaces call for multiple communication channels to convey compliance messages and initiatives. The following groups provide additional venues for discussion and raising awareness about compliance issues.

a) Compliance Officers Group (COG)

Convened by the CCO/AVPMA, this group includes UW Medicine compliance directors, non-UW Medicine compliance officials, internal audit, risk management and operational partners. COG shares best practices and resources, discusses issues of mutual interest/concern, and enhances the likelihood of cross-functional collaboration for important compliance issues.

b) Strategic Leadership Council

Chaired by the CEO/EVPMA/Dean, this group consists of UW Medicine senior leaders who meet at least monthly to address key operational, finance, compliance, and strategic issues.

C. Compliance Program Management and Operations

Four department directors oversee and implement program operations for specific content areas within UW Medicine's defined scope and jurisdiction. Program operations include activities designed to detect and prevent noncompliance, and to mitigate risks associated with non-compliance. Each director has associated responsibilities for reporting, committee management and stakeholder involvement. Directors develop jurisdiction-specific policies and procedures as needed, maintain program records, and participate in enterprise compliance initiatives. See Attachment E for current position descriptions.

Several departments and entities have established compliance positions responsible for a specific scope of program activities. Although the individuals holding these positions have different titles, they function as compliance liaisons and interface with UW Medicine Compliance on issues of mutual concern, are members of COG, and participate in work groups as deemed appropriate for their scope and specialty. Positions generally report to the department or entity head; position descriptions are established and maintained by the individual units. These positions include the following:

- 1.** Laboratory Medicine Compliance Liaison;
- 2.** Pharmacy Compliance Liaison;
- 3.** UWNC Director of Network Operations; *and*
- 4.** ALNW Compliance Liaison.

D. Compliance Roles and Responsibilities

UW Medicine expects all faculty, physicians, staff, students, trainees and volunteers to meet the professional, ethical and regulatory standards associated with their individual roles, and to adhere to a Code of Conduct.

Additional responsibilities are assigned to persons in supervisory, management and leadership positions. These expectations, summarized in Attachment F, are conveyed in new employee orientations, mandatory and voluntary training, and regular communications from compliance officers and senior leaders.

UW Medicine Compliance will fully implement plans its enterprise wide Code of Conduct reviewed and implemented in in early 2020. A version of the documented is included as Attachment G.

E. Enterprise Compliance Reporting Line

UW Medicine/UW Medicine ACE workforce members have safe communication and reporting channels. The enterprise compliance hotline is maintained by the CCO/AVPMA. It provides for anonymous reporting of compliance concerns, although requests for consultation and complaints may also be conveyed directly to compliance officials with the appropriate scope and jurisdiction.



F. Policies, Standards, Guidelines and Procedures



The Program is based on a framework of policies that articulate UW Medicine’s commitment to meet regulatory requirements, establish the culture of compliance, and inform members of the enterprise about allowable and prohibited practices and activities. UW Medicine also relies on standards, guidelines and procedures to meet its compliance requirements.

The Program includes core policies that govern the program itself, a code of conduct governing workforce members, and a suite of compliance policies governing specific healthcare functions and activities. These policies are intended to establish a definitive, centralized leadership position on specific compliance requirements that apply universally to all UW Medicine and UW Medicine ACE workforce members, entities and compliance departments. They are designed to ensure system-wide consistency and form the foundation of the Program. Complete policies are located at <http://depts.washington.edu/comply/policies>. Compliance policies and reviewed and endorsed by COISC and then reviewed and approved by CGG.

Additional compliance policies may be developed by compliance officials who have the authorized scope and jurisdiction to address regulatory or organizational requirements affecting a subset of the system, such as specific entities, constituents or issues. These policies have more limited application, but still are intended to establish a definitive leadership position on certain compliance requirements. The baseline requirements for compliance policy development apply regardless of the policy level.

Standards are specific mandatory controls that govern an operation, a configuration, or a process. Standards are developed and maintained by the operational area delegated with responsibility for establishing internal controls. For example, standards governing information security are established by IT departments in the UW Medicine ACE (including UW Medicine IT Services, School of Medicine IT and VMC IT). Standards undergo a formal review and approval process, and those required by HIPAA are reviewed and endorsed by the CCO/AVPMA.

Guidelines are frequently developed to recommend best practices that do not have the force of policy. Guidelines are generally created by organizational leaders with appropriate scope and jurisdiction, in collaboration with key stakeholders in operational areas.

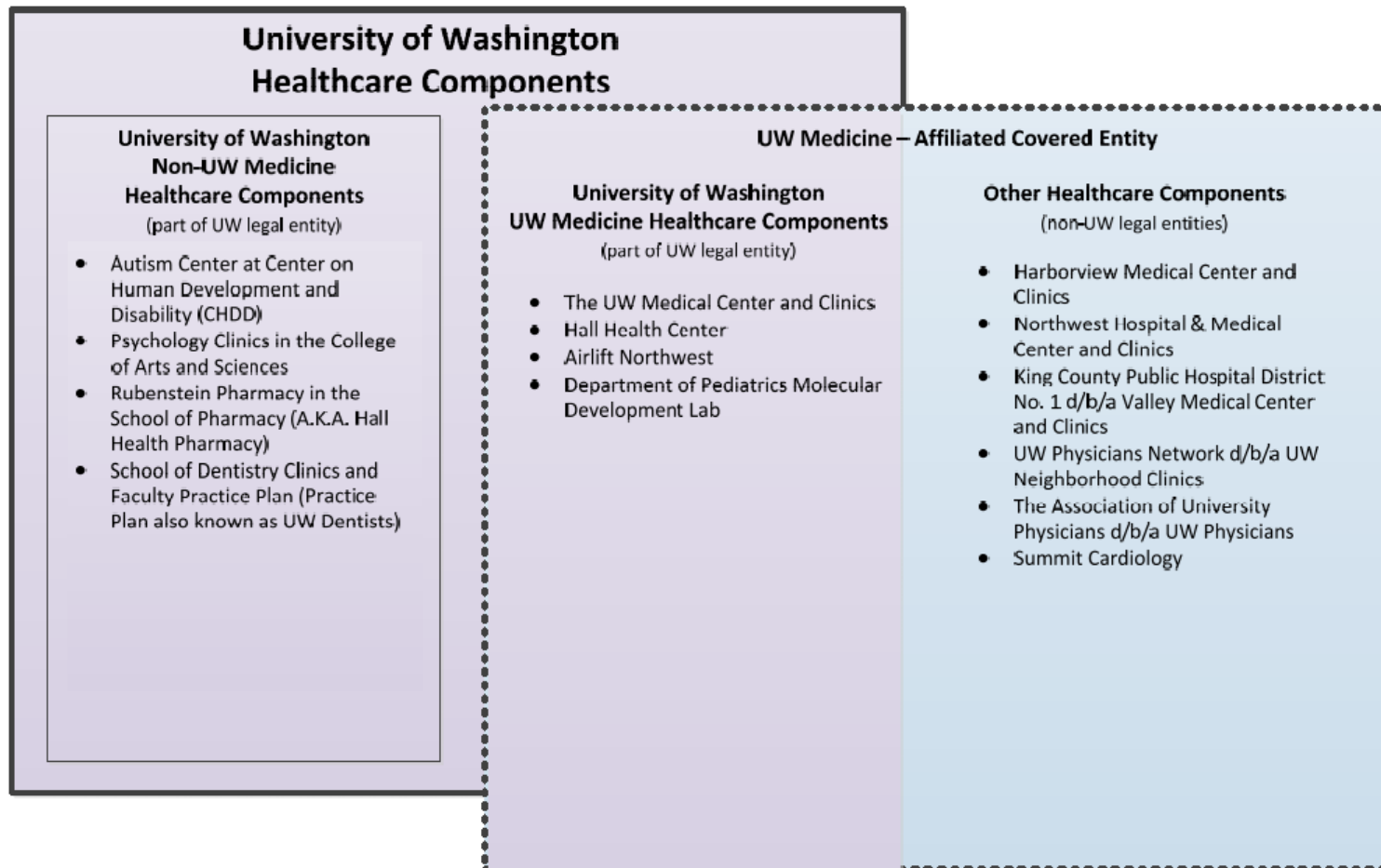
Procedures are step-by-step instructions that, if followed, should achieve compliance with a given policy. Procedures are typically maintained by the operational departments charged with specific implementation responsibilities for a given policy or set of policies. Procedures are developed in consultation with compliance officials, with appropriate scope and jurisdiction, but are established through separate and less formal approval and implementation processes.

G. Code of Conduct

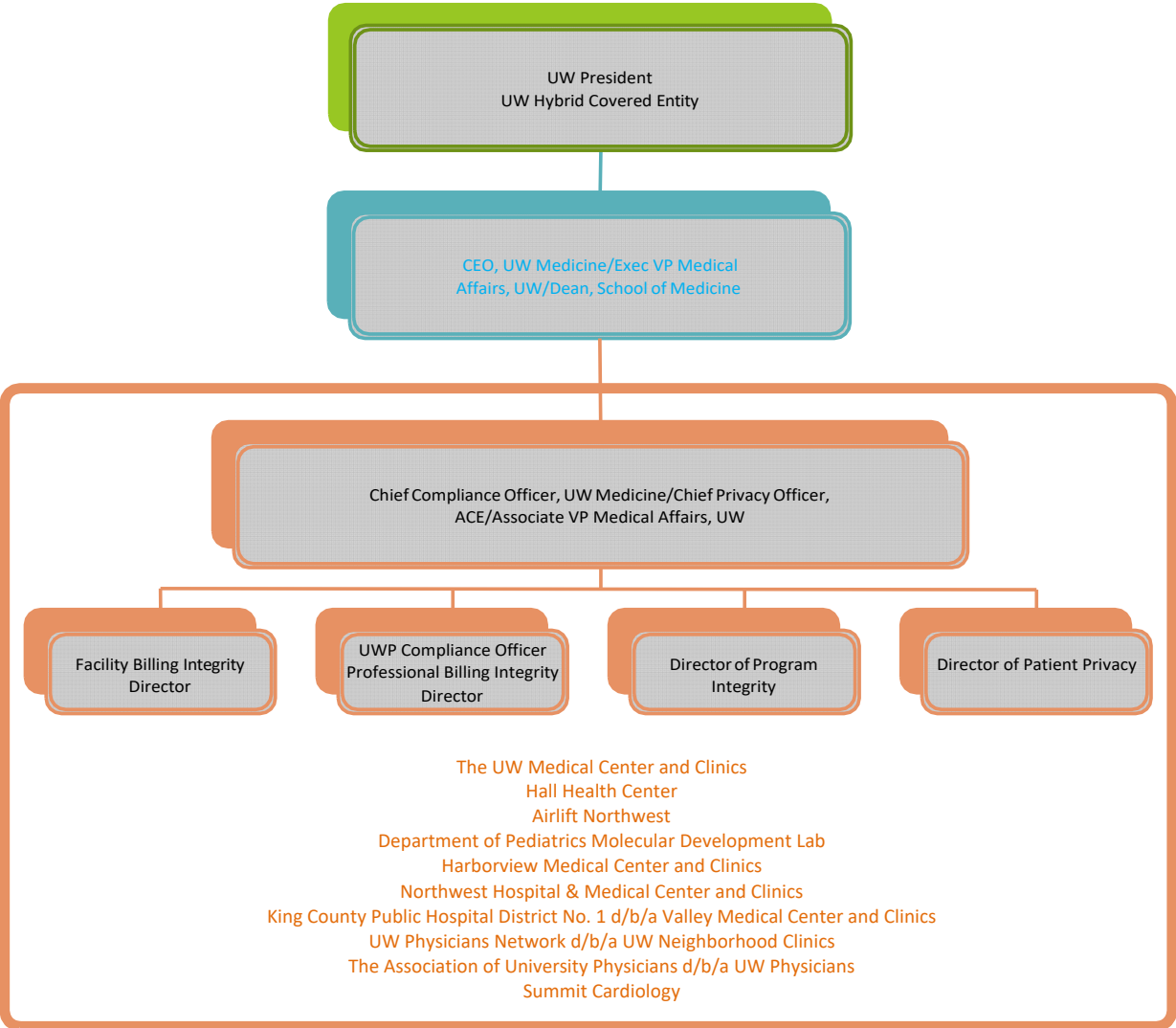
The UW Medicine Compliance Code of Conduct includes 7 core principles, which require all workforce members and entities to:

1. Abide by all laws, regulations, policies, procedures and standards;
2. Prevent fraud and abuse;
3. Promote ethical academic, clinical, research and business conduct;
4. Protect patient privacy and ensure the security of protected health information;
5. Practice responsible data stewardship;
6. Comply with professional and ethical standards; *and*
7. Comply with emergency medicine treatment rules.

These principles are fully explained in the Compliance Code of Conduct provided in Attachment G. It is the responsibility of every UW Medicine workforce member to be knowledgeable about and to act in a manner consistent with these standards. Where circumstances arise that are not covered by these standards or UW Medicine policies, an overall philosophy of honesty and integrity applies.



B. UW Medicine/UW Medicine Compliance Governance



C. Chief Compliance Officer/Associate Vice President for Medical Affairs

**UW MEDICINE
POSITION DESCRIPTION
CHIEF COMPLIANCE OFFICER, UW MEDICINE AND ASSOCIATE VICE
PRESIDENT FOR MEDICAL AFFAIRS, UNIVERSITY OF WASHINGTON**

SUMMARY POSITION DESCRIPTION

The Chief Compliance Officer, UW Medicine/Associate Vice President for Medical Affairs, University of Washington (CCO/AVPMA) reports directly to the CEO, UW Medicine, Executive Vice President for Medical Affairs and Dean of the School of Medicine (CEO/EVPMA/Dean) and is responsible for the following:

- Maintaining and evolving an effective compliance program covering fraud, waste and abuse prevention (e.g., clinical billing, Stark Law and Antikickback Statute), faculty effort reporting, Health Insurance Portability and Accountability Act (HIPAA) privacy and security, Emergency Medical Treatment and Active Labor Act (EMTALA), ethics, professionalism, conflicts of interest and identity theft prevention;
- Assuring coordination and collaboration with affiliated organizations and other UW compliance programs (e.g., research, environmental health and safety, scientific integrity) and assurance offices (e.g., internal audit, risk management, information technology);
- Leading UW Medicine's compliance systems and initiatives, working closely with the UW Vice Presidents for Medical Affairs (UW Medicine Chief Health System Officer, Chief Business Officer, Chief Medical Officer, Chief Advancement Officer, and Chief Financial Officer);
- Ensuring effective communication and collaboration between compliance program officers, entity executives and operational stakeholders;
- Maintaining a direct relationship with the UW Medicine Board Compliance Committee and with the Office of the President of the University;
- Serving as a member of UW Medicine's senior leadership team.

The CCO/AVPMA has an important role in the development of strategies and initiatives to advance the UW Medicine mission of improving the health of the public. Important work required to advance the UW Medicine mission includes, in part, the delivery of advanced medical diagnosis and treatment services, clinical support for the education of medical students and graduate and post-graduate trainees, and maintenance of one of the largest and most advanced university-based basic and clinical research programs in the United States. In support of these activities, the CCO/AVPMA must maintain strong working relations with the US Department of Health and Human Services, US Department of Justice, Washington Department of Social & Health Services, the Medicare intermediary for Washington state, and other similar agencies. The CCO/AVPMA also represents UW Medicine for compliance issues in national professional associations, including but not limited to the Association of Academic Medical Centers (AAMC) and Association of Academic Health Centers (AAHC).

A brief summary of the significant characteristics of the distinct responsibilities and duties of this position are outlined below.

JOB CHARACTERISTICS

DIRECT MANAGEMENT RESPONSIBILITIES

- Maintaining and evolving a comprehensive UW Medicine Compliance Program that satisfies federal and state requirements and is subjected to periodic evaluations of program effectiveness
- Advise the CEO/EVPMA/Dean and VPMAs on the status of material compliance issues at UW Medicine
- As the chief staff support to the UW Medicine Board Compliance Committee, work with the Committee chair to develop annual schedules, manage meeting agendas and establish standard formats for reports to the Committee; prepare the annual compliance report to the UW Board of Regents; report at least annually to entity-specific boards
- Convene the UW Medicine Compliance Operational Implementation Steering Committee, the Compliance Officers Group and the Compliance Program Group; appoint chairs of working groups; ensure effective management and administrative support of official compliance committees
- Provide executive leadership in matters related to the staffing, strategy, philosophy and organizational structure of the UW Medicine compliance program; determine overall staffing needs in consultation with compliance officers; recruit, hire, mentor and supervise compliance officers and other direct reports
- Oversee the strategic planning and management of resources to support the program and establish fiscally responsible budgets
- Ensure development and maintenance of an effective records management program for official compliance documents, including compliance policies
- Serve as signatory authority for UW Medicine compliance policies as delegated by the CEO/EVPMA/Dean
- Serve as Chief Privacy Officer for UW Medicine

SHARED MANAGEMENT RESPONSIBILITIES

- Coordinate the resolution and management of shared concerns and initiatives with entity-level executives and compliance officers, including those from Children's University Medical Group, the Seattle Cancer Care Alliance and other affiliated entities
- Serve as chief staff support to the UW Medicine Compliance Governance Group, working closely with the chair to develop meeting agendas and execute responsibilities identified in the group charter
- Collaborate with the UW Privacy Official, the UW Medicine Chief Information Security Officer, and the UW Chief information Security Officer to address privacy and information security issues

COORDINATION & LIAISON RESPONSIBILITIES

- Serve as the CEO/EVPMA/Dean's chief liaison with offices of the UW administration and the UW Division of the Office of the Attorney General on matters of compliance.
- Serve on executive-level committees of UW Medicine, including the Strategic Leadership Council, and participate in UW Medicine strategic planning processes
- Coordinate related administrative matters with UW VPMAs; School of Medicine Vice Deans, Chairs and Directors; UW Medicine Executive Directors, and presidents of the clinical practice plans
- Represent UW Medicine Compliance in national, state and regional associations.

EDUCATION REQUIREMENTS

A Bachelor's degree in business, public administration, policy administration, health administration or closely related field is required; an advanced degree is preferred.

WORK EXPERIENCE REQUIREMENTS

- Ten years of progressively responsible experience in developing, implementing and administering comprehensive compliance programs is required, at least three years of which must be at or above the level of director/officer in a public university setting
- At least five years of increasingly responsible compliance experience in an academic medical center is desired.
- Extensive knowledge of compliance principles and regulatory requirements that impact academic medical centers is required.

UW MEDICINE COMPLIANCE COMMITTEES

D. UW Medicine Compliance Committees

Group/ Scope	Purpose	Composition
<p>UW Medicine Compliance Committee (UWMCC)</p> <p>Meets quarterly; the first Monday, in the second month of each quarter (in February, May, August and November).</p> <p>Scope: Enterprise and for HIPAA, the UW Medicine Affiliated Covered Entities</p> <p>Duties include but are not limited to advising on the following:</p> <ul style="list-style-type: none"> • Key compliance policies • Compliance program infrastructure and reporting relationships • Scope of authority of key positions • Ongoing assessment of compliance risks and the effectiveness of mitigation activities • Level of resources dedicated to the compliance programs • Monitor the progress of new initiatives, process improvement projects, and programs • Receive reports of relevant noncompliance and misconduct • Provide advice on compliance activities • Make recommendations to improve the effectiveness of UW Medicine compliance programs • Annual review and evaluation of the performance of the committee. 	<ul style="list-style-type: none"> • Advise the CEO, EVPMA and Dean regarding the implementation and effectiveness of UW Medicine compliance programs. • Assure that the organizations partially owned by UW Medicine or operated as part of UW Medicine have effective compliance programs. • Provide advice on the development of the annual UW Medicine compliance report to the UW Board of Regents. • Keep the CEO, EVPMA and Dean informed of its activities and findings concerning the implementation and effectiveness of UW Medicine compliance programs. 	<ul style="list-style-type: none"> • All scheduled meetings <ul style="list-style-type: none"> ○ UWMCC member designees ○ Appointed community members <p>The following non-voting individuals are also invited to attend the committee meetings on a regular basis:</p> <ul style="list-style-type: none"> • CEO/EVPMA/Dean • Chief health system officer, UW Medicine/vice president for medical affairs, University of Washington • Chief business officer, UW Medicine/vice president for medical affairs, University of Washington • Chief financial officer, UW Medicine, vice president for medical affairs, University of Washington (CFO/VPMA) • Chief advancement officer, UW Medicine/vice president for medical affairs, University of Washington • Chief medical officer, UW Medicine/vice president for medical affairs, University of Washington • Chief compliance officer/associate vice president for medical affairs • UW Medicine strategic clinical business officer/associate vice president for medical affairs, University of Washington • President, UW Physicians • Vice dean for administration and finance, School of Medicine; and • Other non-voting individuals invited by the committee chair

UW MEDICINE COMPLIANCE COMMITTEES

<p>Compliance Governance Group (CGG)</p> <p>Meets monthly; on the third Friday of each month with special meetings as required.</p> <p>Scope: UW Medicine, and for purposes of HIPAA, the UW Medicine Affiliated Covered Entities</p> <p>Deliverables:</p> <ul style="list-style-type: none"> • Executive-level compliance program mandates and structure • Leadership updates to the UW Medicine Compliance Committee • Reports to UW Medicine Strategic Leadership Council 	<ul style="list-style-type: none"> • Strategic compliance planning and problem solving • Support enterprise compliance program (including policies, program elements, work plan, roles and responsibilities, committee structure) • Approve enforcement mandates and related messaging • Establish risk tolerance philosophy, approve mitigation plans and allocate resources 	<p>Members are appointed by the CEO, UW Medicine/Executive Vice President for Medical Affairs/Dean, UW School of Medicine</p> <ul style="list-style-type: none"> • Vice Presidents: <ul style="list-style-type: none"> ○ Chief Business Officer (Chair) ** ○ Chief Health System Officer ** ○ Chief Financial Officer ○ Chief Medical Officer ○ Chief Advancement Officer • Chief Compliance Officer/AVPMA ** • Director of Business & Legal Affairs/AVPMA ** • Vice Dean, Administration & Finance, School of Medicine ** • UWP Practice Plan President ** • Issue-specific advisors: <ul style="list-style-type: none"> ○ Vice Deans: Academic, Rural and Regional Affairs; Graduate Medical Education; and Research and Graduate Education ○ Legal counsel ○ Content experts (Chief Information Officer, Information Security Operations Officer, Compliance Officers/Directors, Human Resources) <p>** Member of Steering Committee</p>
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UW MEDICINE COMPLIANCE COMMITTEES

<p>Compliance Oversight and Implementation Group (COISC)</p> <p>Meets quarterly; the second Tuesday, in the second month of each quarter (in February, May, August and November).</p> <p>Scope: UW Medicine: Clinical billing, clinical research billing, EMTALA, Stark-Antikickback, Ethics, Conflict of Interest, the UW Medicine Affiliated Covered Entities (ACE): Patient Privacy and Information Security Compliance</p> <p>Deliverables:</p> <ul style="list-style-type: none"> • Consistent implementation of compliance policies • Risk assessments and policy recommendations for CGG • Effective enforcement mechanisms • Reports to CGG 	<ul style="list-style-type: none"> • Oversee consistent implementation of compliance program activities throughout UW Medicine entities • Review proposed compliance policies and recommend approval to CGG • Identify and resolve implementation challenges/barriers • Communicate enforcement mandates • Participate in enterprise risk assessment process, recommend approval of mitigation plans, identify resource needs 	<p>Members are appointed by UW Medicine’s Chief Business Officer in consultation with the CGG</p> <ul style="list-style-type: none"> • Chief Compliance Officer/AVPMA (COISC chair) • Chair, UWP Compliance Committee • CIO, CISO – UW Medicine ITS • Compliance Officer, CUMG • Director, Clinical Billing Integrity, UW Medicine Compliance • Director of Patient Privacy & Program Integrity, UW Medicine Compliance • Director of Research & Academic Affairs, UW Medicine Compliance • Corporate Integrity Officer, Seattle Cancer Care Alliance • Director, Health Information Management • Director, Health Sciences & UW Medicine Risk Management • Executive Directors of HMC, UWMC, NWH, UWNC and ALNW • Legal Counsel, VMC • Privacy Officer, Seattle Cancer Care Alliance • Senior Director of Business & Regulatory Affairs, School of Medicine • Senior Vice President, Strategic Services, VMC • SoM Assistant Dean for Operations and Administration, Graduate Medical Education • SoM Vice Dean for Research and Graduate Education
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**UW Medicine Compliance
Job Description**

Working Title:	Director
Payroll Title:	Director - 1111
Salary Grade:	11
Department:	UW Medicine Compliance
Unit:	Compliance – Facility Billing Integrity
Job Classification:	Professional/Exempt
Reports to:	Chief Compliance Officer

Background

The UW Medicine (UWM) Compliance Program includes activities and functions conducted at the enterprise level by the Chief Compliance Officer/Associate VP for Medical Affairs (CCO/AVPMA). The CCO/AVPMA is accountable to the CEO/EVPMA/Dean for leadership of UW Medicine’s enterprise-wide compliance systems and initiatives, and works closely with the operational compliance officers, as well as the UW’s central offices, to coordinate cross-entity and institution-wide compliance issues.

Each UW Medicine Director is responsible for developing and implementing components of the UW Medicine compliance program for specific content or risk areas and/or for specific constituents. Compliance program activities include development of policies and standards, auditing, monitoring, education/outreach, investigations, risk assessment and mitigation, regulatory monitoring and program modification, and on-going evaluation and reporting of program effectiveness.

Position Purpose

The Director, Facility Billing Integrity is a senior leadership position reporting directly to the CCO/AVPMA with responsibilities for overseeing and coordinating systems and initiatives required to establish an effective facility billing compliance program for UW Medicine.

At the direction of the CCO/AVPM, the Director, Facility Billing Integrity develops and implements UW Medicine compliance program strategic goals, oversees applicable required elements of an effective compliance program as outlined by the Federal Sentencing Guidelines, directs resources to accomplish the goals and mission of the unit, and ensures efficient and effective team operations.

The Director, Facility Billing Integrity also works cooperatively with other UW Medicine Compliance directors, the CCO/AVPMA, UW Health Sciences risk managers, entity leaders, and the UW Medicine and UW information security officers to identify and resolve shared issues and concerns.

External Relations. Each element in the UW Medicine compliance program requires strategic, planning, and operational interfaces with other UW offices (including compliance officers and directors, risk management, UW attorney general, HR, IT, facilities, purchasing, contracting, , accounting, financial management). The Director, Facility Billing Integrity serves as the Facility Billing Integrity team’s main point of contact for those interfaces.

The Director, Facility Billing Integrity provides strategic advice, recommends policy, collaborates on risk management activities, recommends and reports on compliance initiatives and program activities, coordinates resolution of issues across all four entities, and collaborates with entities related to issue management, inquires/investigations, and operational advice to help mitigate organizational risk.

The Director, Facility Billing Integrity serves as primary point of contact for all external government reviews related to Facility Billing Integrity or delegate authority as appropriate; coordinate assessments and ensure timely responses; communicate openly and promptly with payers, the OIG and other external parties as deemed appropriate and maintain good relationships with all of these parties.

Internal Operations. Internally, the Director, Facility Billing Integrity works closely with the CCO/AVPMA to develop unit-wide expectations for employees, maintain and monitor staffing levels, identify and document critical knowledge-skills and attributes for employees, and establish strategic plans for recruiting and retaining quality staff. The Director, Facility Billing Integrity ensures that the performance evaluation achieves unit goals for excellence and employee motivation.

This position requires leadership and responsibility overseeing the operational requirements of the facility billing integrity for the UW Medicine entities that bill for facility services.

The Director, Facility Billing Integrity is a full partner with the CCO/AVPMA in developing the short-term and long-range strategic goals for both unit-based and system-wide compliance operations, initiatives, and projects, and serves as project director for major initiatives.

As a confidential assistant to the CCO/AVPMA, the Director, Facility Billing Integrity uses discretion to advance issues on behalf of the CCO/AVPMA and operates independently using judgment and discretion to handle sensitive operational, implementation, and organizational concerns.

Position Complexities:

This position has substantial authority and responsibility for directing/controlling UW Medicine Compliance operations and resources of the program specifically related to Facility Billing Integrity unit of the division; and is accountable for results/resolutions. Ability to independently formulate and recommend finalized operational elements, documents substantiating the need, and outlining the requirements for, institutional practices and procedures, infrastructure, and outreach. Ability to determine compliance with internal and external regulations and policies; and act on behalf of leadership towards the operational and program goals of the unit and the compliance-related efforts throughout the health system

Position Dimensions and Impact to the University:

This position provides leadership and has responsibility overseeing the operational requirements of the UW Medicine Compliance Facility Billing Integrity program as it affects the UW Medicine entities that bill for facility services.

Duties and Responsibilities

60%: Leadership/Direction - individual leadership duties listed below:

- o Oversee daily activities associated with the risk areas and program functions under the auspices of the CCO/AVPMA, advise the CCO/AVPMA about program operations and risk assessment/mitigation strategies, monitor regulatory developments and recommend program modifications.
- o Effectively supervise and allocate resources and talent in order to meet program objective(s).
- o Serve as in-house expert on matters of regulatory compliance and maintain awareness of laws, regulations and status of current enforcement initiatives.
- o Manage the development and implementation of policies and procedures for UW Medicine Compliance, working closely with the CCO/AVPMA, enterprise-wide content experts, legal counsel, and administrative staff.
- o Develop proactive and reactive education and training content sufficient to address and mitigate organizational compliance-related risk.
- o Participate and or lead enterprise-wide risk analysis as needed and report findings as well as mitigation plans to the CCO/AVPMA.
- o Effectively engage in the development and implementation of the annual Compliance work plan; coordinating with the CCO/AVPMA, other directors and enterprise-wide compliance officials and content experts.
- o In conjunction with the CCO/AVPMA, unit directors, managers and other staff, develop and implement effective policies and procedures that address regulatory requirements, including hotline, triage/case management, investigations and resolutions, inquiries, complaints, and consultation requests.
- o Participate in or convene institutional committees and/or workgroups as assigned by the CCO/AVPMA.
- o Oversee creation and maintenance of written documentation for the Compliance Program (e.g., charters, process improvement projects, corrective action plans) as required by applicable regulations; retain records in accordance with the UW Records Retention Schedule.
- o Draft documents on behalf of the CCO/AVPMA for submission in management/board reports and present regularly to the executive leadership of UW Medicine, collaborate with the CCO/AVPMA on development of the annual UW Medicine compliance report to the UW Board of Regents.
- o With delegated authority from the CCO/AVPMA, represent UWM to external regulators as needed.

- o Work closely with other university officials when there are mutual concerns, system-wide policy needs, and urgent or emergent issues.
- o Maintain and report regularly on program activities, work plans, project plans, and investigatory mitigation plans.
- o Demonstrate team leadership by effectively managing, both directly and through influence, and guiding teams and group efforts; provide an appropriate level of feedback concerning progress in order to execute unit goals.
- o Oversee daily activities associated with the assigned risk areas and program functions, advise the CCO/AVPMA about program operations and risk assessment/mitigation strategies, monitor regulatory developments and recommend program modifications.
- o Ensure effective monitoring, auditing and risk assessment activities; conduct risk assessments as needed and report results to the CCO/AVPMA.
- o The position operates independently using judgment and discretion to handle sensitive compliance program and political issues.

20% Strategic Planning - Activities listed below

- o Provide strategic and logistical direction, guidance, and advice regarding program workflow and operations. Identify and determine objectives, goals and outcomes, including performance metrics, for implementation projects. Continually utilize and demonstrate strategic thinking by formulating objectives and priorities to develop and implement plans that support the long-term interests of the overall UW Medicine Compliance Program.
- o Develop short and long-term plans in support of the goals of the unit.
- o Research health system-wide needs to identify potential challenges and develop strategies for implementation.
- o Develop and lead the implementation of strategy by fostering innovation, and identifying potential opportunities, challenges, and business requirements for new operations.
- o Facilitate collaboration with key stakeholders in strategic planning and policy development.
- o Build strong partnerships with peer organizations to garner input for setting the direction of the department from both an operational and programmatic perspective.

20% Operations - Activities listed below

- o In partnership with the CCO/AVPMA and other directors, charter the creation, strategic and logistical direction, guidance, and provisioning of workflow and operations, systems and technology, facilities, data/decision support systems, education, training and outreach, human resources, institutional and unit-based policies, health system-wide intake/triage and hotline methodology, and

space and resource management. Identify and determine objectives, goals and outcomes, including performance metrics, for improvement projects.

- o Establish decision support mechanisms and systems that facilitate the management of data, audit results, information and project tracking, data analysis and trending; and, strategize with CCO/AVPMA and other directors to identify opportunities, deficiencies, and risks in order to execute appropriate education, training and/or outreach.
- o Develop an education, training and outreach identity that has system-wide visibility, such that it builds awareness and assists in mitigating risk. Build key partnerships, and work with subject matter experts throughout the health system, industry, and community to execute the program.
- o Develop unit and entity-based policies, and collaborate with various system-wide stakeholders on the development of health system-based compliance policies. Facilitate process to ensure solid policy outreach throughout all applicable UW Medicine entities.
- o Design and implement change management efforts.
- o Oversee operations and administrative activities across the unit.
- o Supervise key personnel within the division in order to advance the strategic goals of the unit.
- o Collaborate with the CCO/AVPMA to ensure that health system goals, timelines, methods, project plans, and effective communications and outreach are achieved for compliance-related integrations.
- o Partner with the CCO/AVPMA as required in order to staff UW Medicine senior leadership requirements and directives.

Minimum Requirements:

Bachelor’s degree and 6+ years of healthcare administrative/management/compliance leadership experience in a complex organization.

3+ years of people management experience.

Medical records and / or coding certification (any of the following credentials are acceptable: CPC, COC, CIC, CCS, CCS-P, RHIA, RHIT).

- Knowledge and understanding of healthcare regulatory requirements, including one or more program content areas (fraud, waste and abuse prevention, clinical documentation/coding/billing, HIPAA, privacy and information security, EMTALA, hospital-related research compliance (including clinical research billing), workplace ethics, industry relations, conflicts of interest and external reviews).
- Strong financial management, strategic planning, project management, business and operations management experience.

- Excellent cross-group collaboration skills demonstrated executive maturity and ability to impact and influence people at all levels in the organization.
- Must demonstrate strategic thinking, business insight and creativity in resolving problems.
- Ability to lead, inspire and develop a team of high performing individuals.
- Strong written and verbal skills.
- Advanced Microsoft Office applications experience.

Equivalent education/experience may not be substituted for minimum qualifications.

Preferred Requirements:

Advanced degree, preferably in business or healthcare administration

Experience in an academic medical center

Working knowledge of University financial and human resources-based operating systems

Statistical analysis and data benchmarking proficiency

**UW Medicine Compliance
Job Description**

Working Title:	Director
Payroll Title:	Director - 1111
Salary Grade:	11
Department:	UW Medicine Compliance
Unit:	Compliance – Patient Privacy
Job Classification:	Professional/Exempt
Reports to:	Chief Compliance Officer

Background

UW Medicine Compliance oversees the development and coordination of compliance programs across a wide range of risk areas, including clinical documentation/coding/billing, privacy and information security, EMTALA, hospital-related research compliance (including clinical research billing), workplace ethics, industry relations, and conflicts of interest. The program covers all UW Medicine entities, including UW Medical Center, Harborview Medical Center, UW Neighborhood Clinics, Airlift Northwest, Valley Medical Center, UW Physicians, the HIPAA Covered Entity and the UW School of Medicine. Interfaces include other university compliance offices on issues involving UW Medicine constituents and entities.

Program functions including but not limited to daily operations of the program, development, implementation, and maintenance of policies and procedures, monitoring program compliance, risk assessment and mitigation, investigation and tracking of incidents and breaches and insuring patients' rights in compliance with federal and state laws, education/outreach, regulatory monitoring and program modification, and on-going evaluation and reporting of program effectiveness.

UW Medicine Compliance operates under the strategic guidance of the Chief Compliance Officer, UW Medicine/Associate Vice President for Medical Affairs, UW (CCO/AVPMA). Compliance Officers with specific subject matter expertise direct program activities, report directly to the CCO/AVPMA and have dotted-line relationships with entity executives.

Position Purpose

The Director of Patient Privacy is the team lead and serves as a primary contact point and content expert for compliance with state and federal laws pertaining to patient privacy.

Position Complexities

The Director of Patient Privacy is responsible for overseeing the daily activities required for the operation of the privacy team and has overall responsibility for the privacy team's activities, including responding to inquiries, investigating complaints, managing projects, developing and delivering education and outreach, developing and implementing audit/monitoring plans, reporting on program activities, maintaining program records, monitoring regulatory developments, creating, reviewing, and updating policies, performing risk assessments, developing risk mitigation strategies, and evaluating

program effectiveness. The Director of Patient Privacy regularly interfaces with UW Medicine senior leadership, and other institutional officials including IT Services staff, UW Health Sciences risk managers, Health Information Management staff, entity patient relations managers, and the UW Medicine and UW Information Security colleagues to identify and resolve shared issues and concerns.

Position Dimensions and Impact to University

This position provides overarching leadership and responsibility for the patient privacy program for all seven entities that comprise UW Medicine Compliance

Duties and Responsibilities

Lead Collaborative Efforts:

- Build and manage key relationships with internal and external stakeholders, colleagues, and clients by providing collaborative partnership in areas of shared interests, concerns, and risk.
- Collaborate with the information security officer to ensure alignment between security and privacy compliance programs including policies, practices, investigations, and acts as a liaison to the information systems department.
- Collaborate with the UW Privacy Officer to work on mutual matters and to ensure alignment between privacy programs as necessary.
- Serve as a subject matter expert in key areas involving the privacy of patient information, including information security and technology issues related to enterprise clinical systems, electronic access issues, and security risk assessment.

Program Oversight:

- Manage the development, implementation, and maintenance of privacy policies and procedures in accordance with applicable federal and state laws and regulations; work closely with UW Medicine leaders, IT teams, stakeholders and governance committees in the development, approval, and implementation process for privacy policies, procedures, and internal controls to ensure outcomes are appropriate and operating as intended.
- Convene and effectively participate in UW and UW Medicine privacy-related committees and workgroups where data security/privacy are addressed to coordinate Program development and implementation.
- Work closely with IT security staff, HIM teams, and other information technology personnel to ensure that the organization's privacy protections keep pace with technological advances
- Coordinate with senior management, operational managers, IT security staff, and business support services to provide for a business continuity plan and disaster recovery service.
- Oversee efforts to assess the effectiveness of privacy and security internal controls across UW Medicine and to develop proactive responses to emerging risks and regulatory developments.
- Conduct on-going privacy risk assessments, including development, tracking and reporting of issue mitigation strategies. Document activities to meet current regulatory requirements (e.g., HIPAA, CMS, HITECH, and NIST).
- Address privacy-related inquiries, requests for consultation, and complaints; work closely with operational leadership in developing responses and mitigation strategies to address findings.

- Develop and implement an annual HIPAA privacy and security auditing program that incorporates feedback and education into the process and assures timely communication of audit results to the (Interim) CCO and appropriate entity leadership; recommend corrective actions as necessary.
- In conjunction with the (Interim) CCO, develop HIPAA and related privacy and security education and outreach for workforce members throughout the UW Medicine system.
- Monitor developments in related rules, regulations and judicial interpretations; make recommendations to the Interim CCO as needed to maintain compliance and mitigate risk.

Project Management:

- Develop/oversee development of privacy-related projects, tasks, and schedules; monitoring and report on status to help ensure successful completion of projects within the resources and timelines allotted.

Supervision:

- Foster a team of highly seasoned privacy professionals.
- Provide leadership in matters related to unit staffing, strategy, philosophy, and structure necessary to support the goals and objectives for the UW Medicine Compliance Privacy Program; determine unit staffing needs in consultation with (Interim) CCO; recruit, hire, and supervise direct reports and unit staff.
- Accomplish staff results by communicating job expectations and mentoring, planning, monitoring, and appraising job results; coaching, counseling, and disciplining employees; and developing, coordinating, and enforcing systems, policies, procedures, and productivity standards

Qualifications

Required

- Bachelor's degree and at least five years of increasing responsibility or experience in a compliance-related field, of which three years of experience and expertise is in healthcare privacy and security compliance **
- Technology and security related expertise, knowledge of enterprise clinical systems.
- At least three years of supervisory experience, with proven leadership, communication, organizational, team-building and critical thinking skills.
- Demonstrated record of effective skills in facilitation, creative problem solving and a team-based approach to achieving success in a highly technical environment.
- Excellent analytical, time management, organizational, and supervisory skills; and an understanding of a risk-based approach to securing institutional resources.
- Strong ability to communicate effectively, both verbally and in writing with employees, medical staff, board members, and external parties, including active listening and presentation skills.
- Demonstrated ability to independently prioritize and organize work, basic computer knowledge, ability to lead interdisciplinary teams.
- Proven leadership, supervision, communication, team-building and problem-solving skills; demonstrated ability to work independently and effectively prioritize work.
- Demonstrated success in leading projects/initiatives, designing work processes, and implementing programs within a multifaceted, highly matrixed organization.

**or an equivalent combination of education and work experience.

Preferred:

- Advanced degree, preferably in law, business or healthcare administration.
- Five years-experience managing a healthcare compliance content area.
- Five years' experience in an academic medical center.
- Two years' experience developing and managing administrative, technical, and physical controls as required by the HIPAA security rule and the HITECH act.
- Professional privacy and/or security certification such as Certified in Healthcare Privacy and Security (CHPS) and/or other healthcare industry related security credentials.

CONDITION OF EMPLOYMENT

UW Medicine Compliance manages a significant volume of audits, inquiries and consultations. Work priorities shift in response to fluctuating demands. Full time schedules are assumed to be at least 40 hours, however, incumbents are expected to remain flexible to accommodate the unit's goals and mission, and to work beyond their normal schedule when necessary.

**UW Medicine Compliance
Job Description
Effective: July 19, 2019**

Working Title:	Director, Program Integrity
Payroll Title/Code:	1111 Director
Salary Grade:	11
Department:	UW Medicine Compliance
Unit:	Program Integrity
Job Classification:	Professional/Exempt
Reports to:	Chief Compliance Officer/Associate VP for Medical Affairs

Background

UW Medicine Compliance oversees the development and coordination of compliance programs across a wide range of risk areas, including clinical documentation/coding/billing, privacy and information security, EMTALA, hospital-related research compliance (including clinical research billing), workplace ethics, industry relations, and conflicts of interest. The program covers all UW Medicine entities, including UW Medical Center, Harborview Medical Center, Northwest Hospital and Medical Center, UW Neighborhood Clinics, Airlift Northwest, Valley Medical Center, UW Physicians, the HIPAA Covered Entity and the UW School of Medicine. Interfaces include other university compliance offices on issues involving UW Medicine constituents and entities.

Program functions include development of policies and standards, auditing, monitoring, education/outreach, investigations, risk assessment and mitigation, regulatory monitoring and program modification, and on-going evaluation and reporting of program effectiveness.

UW Medicine Compliance operates under the strategic guidance of the Chief Compliance Officer, UW Medicine/ Associate Vice President for Medical Affairs, UW (CCO/AVPMA). Compliance Officers and Directors with specific subject matter expertise direct program activities, report directly to the CCO/AVPMA and have dotted-line relationships with entity executives.

Position Purpose

The Director of Program Integrity is a senior leadership position reporting directly to the UW Medicine Chief Compliance Officer/UW Associate Vice President for Medical Affairs (CCO/AVPMA) that serves two primary roles:

1. Directs all activities necessary to ensure the integrity and effectiveness of the UW Medicine Compliance program, including: provides strategic leadership, implementing solutions to ensure all elements of the compliance program are addressed and effective, identifying opportunities for improvement, and collaborating with internal and external stakeholders as needed.
2. Directs the implementation and ongoing maintenance of all activities associated with an effective Conflicts of Interest/Ethics compliance program across all UW Medicine entities (under the umbrella of the UW Medicine Compliance program) in order to promote compliance with applicable state and federal conflicts of interest laws and regulations.

This position directs all infrastructure activities and systems required to support the development and implementation of UW Medicine compliance program strategic goals, oversees applicable elements of

an effective compliance program as outlined by the U.S. Federal Sentencing Guidelines, directs the activities required to accomplish the goals and mission of the Program Integrity team, and ensures efficient and effective team operations.

The Director of Program Integrity is a full partner with the CCO/AVPMA and other unit directors in developing short-term and long-range strategic goals for both unit-based and system-wide compliance operations, initiatives and projects, and serves as project director for major initiatives. The Director of Program Integrity also works collaboratively with the CCO/AVPMA, other UW Medicine Compliance directors and other UW Medicine/UW department and entity leaders to accomplish program goals as well as to identify and resolve shared issues and concerns. As a confidential assistant to the CCO/AVPMA, the Director of Program Integrity uses discretion to advance issues on behalf of the CCO/AVPMA and operates independently using good judgment and discretion to handle sensitive operational, implementation and organizational concerns.

Positions Complexities:

Each element of the UW Medicine compliance program requires strategic, planning and operational interfaces with the other UW Medicine Compliance department units as well as other UW Medicine and UW offices/departments (compliance officers, directors, risk management, UW attorney general, human resources, IT, facilities, purchasing and contracting, learning management system, accounting, financial management, web development, marketing and community relations). The Director of Program Integrity works collaboratively with the CCO/AVPMA, other UW Medicine Compliance directors and other UW Medicine/UW department and entity leaders to accomplish program goals as well as to identify and resolve shared issues and concerns.

The Director of Program Integrity must monitor regulatory developments, enforcement activities and evolving industry practices, assess compliance with internal and external laws, regulations, policies and related requirements, and develop and implement operational and/or programmatic solutions, whether unit-based or system-wide initiatives, to address gaps and maintain the effectiveness of the UW Medicine compliance program.

Position Dimensions and impact to the University:

Directs the implementation of best-practices for ensuring program integrity and mitigating organizational risk across UW Medicine, including but not limited to committee structures, policies and procedures, communication channels, education and training, monitoring/auditing, investigation, enforcement, leadership reporting, and risk assessment. Serves as principle architect and director of the functions necessary for an effective Conflicts of Interest/Ethics compliance program that serves all UW Medicine entities

Specific Duties and Responsibilities

Program Direction:

1. Direct a team of in-house experts on matters of compliance content areas including ethics, Stark/AKS, conflicts of interest, vendor relations, etc.
2. Maintain awareness of laws/regulations, status of current enforcement initiatives, and best practices to ensure program integrity, assess compliance with internal and external laws, regulations, policies and related requirements, and develop and implement operational and/or

programmatic solutions, to address gaps and maintain the effectiveness of the UW Medicine compliance program.

3. Serve as the principle architect of the program functions necessary for an effective healthcare compliance program, working closely with the CCO/AVPMA and collaborating with other compliance directors, content experts, entity leaders and legal counsel on matters of shared concern. Direct the development and implementation of program elements and practices to ensure:
 - a. execution of an approved risk assessment process and incorporation of results into written work plans that identify deliverables, timelines and responsible parties;
 - b. effective monitoring and auditing that includes analysis, reporting and use of results to modify program strategy as needed;
 - c. accurate, current and clear program policies;
 - d. education/training/outreach activities and mechanisms, including a website, that provides effective guidance, facilitates compliance and mitigates risk; and
 - e. Development and revision of compliance related policies.
 - f. timely and thorough intake, triage and resolution of inquiries and complaints.
4. Direct the implementation of decision support mechanisms and systems that facilitate the management of compliance information and production of reports needed to support compliance program activities.
5. Provide regular reports on program activities and issues to the CCO/AVPMA, UW Medicine Vice Presidents, UW Medicine entity executives and other UW Medicine leaders and compliance committees, and an annual written report to the UW Board of Regents.
6. Serve as the primary point of contact for payor attestations related to program integrity or delegate responsibility as appropriate; direct the assessments and ensure timely responses; communicate openly and promptly with external parties as deemed appropriate; maintain good relationships with these parties.

Strategic Planning:

7. Serve as a member of the CCO/AVPMA's executive team, working closely with other content experts to achieve efficiencies and effectiveness throughout the compliance department, and participate in departmental strategic planning, internal policy/procedure development, budget and resource planning, and business decisions.
8. Serve as contact with legal counsel and the Attorney General's Office regarding related compliance strategies and responses to legal issues.

Consultation and Collaboration:

9. Provide consultative leadership and support to the CCO/AVPMA and entity executives to ensure that adequate steps are taken to correct problems identified through compliance program activities and to prevent their reoccurrence, including employee sanctions and operational changes.
10. Establish cooperative and collaborative relationships with operational leaders throughout UW Medicine on matters of shared concern in order to ensure effective and timely management of issues, initiatives and projects.
11. Provide strategic partnership to entity executives when they are jointly responsible with UW Medicine Compliance for the success of compliance programs in their respective areas.
12. Convene and direct constituent and entity-based committees and work groups as needed.

Project Management:

13. Direct institution-wide initiatives, process improvement projects, training program implementation and policy implementation processes as necessary; serve on committees and taskforces as assigned.

Supervision:

14. Provide strategic direction to staff responsible for daily activities of the Program Integrity unit; provide leadership, mentoring, staff development, and performance management; take disciplinary actions as needed in consultation with human resource department. Anticipate staffing and resource needs.

Supervisory Responsibilities:

The Director of Program Integrity develops unit-wide expectations for employees on the Program Integrity team, maintains and monitors staffing levels (recruiting and hiring as needed), identifies and documents job responsibilities as well as critical knowledge-skills and attributes for employees, evaluates the performance of Program Integrity staff and takes corrective actions as needed, and establishes strategic plans for recruiting and retaining quality staff. The Director of Program Integrity also ensures that the performance evaluation and reward system achieves unit goals for excellence and employee motivation. This position will direct a team of five to six individuals.

QUALIFICATIONS

Required

- Bachelor's Degree**
- 7+ years of healthcare administrative/management/compliance leadership experience in a complex organization
- 3+ years of people management experience
- Knowledge and understanding of healthcare regulatory requirements and best practices for ensuring the integrity and effectiveness of compliance programs
- Strong financial management, strategic planning, project management, business and operations management experience
- Excellent cross-group collaboration skills, demonstrated executive maturity and ability to impact and influence people at all levels in the organization
- Demonstrated success in leading projects/initiatives and designing work processes and implementing programs within a multifaceted, highly matrixed organization
- Proven leadership, supervision, team-building and problem-solving skills
- Strong written and verbal communication skills
- Advanced Microsoft Office applications experience.

**or an equivalent combination of education and work experience

Preferred

- Advanced degree in education or healthcare

- Knowledge of project management principles
- Experience working in an academic medical center

CONDITION OF EMPLOYMENT

UW Medicine Compliance manages a significant volume of audits, inquiries and consultations. Work priorities shift in response to fluctuating demands. Full time schedules are assumed to be at least 40 hours, however, employees are expected to remain flexible to accommodate the unit's goals and mission, and to work beyond their normal schedule when necessary.

**UW Medicine Compliance
Job Description**

Working Title:	Director, Professional Billing Integrity, UWP Compliance Officer
Payroll Title:	Director - 1111
Salary Grade:	11
Department:	UW Medicine Compliance
Unit:	Compliance – UWP
Job Classification:	Professional/Exempt
Reports to:	Compliance Officer

Background

UW Medicine Compliance oversees the development and coordination of compliance programs across a wide range of risk areas, including clinical documentation/coding/billing, privacy and information security, EMTALA, hospital-related research compliance (including clinical research billing), workplace ethics, industry relations, and conflicts of interest. The program covers all UW Medicine entities, including UW Medical Center, Harborview Medical Center, Northwest Hospital and Medical Center, UW Neighborhood Clinics, Airlift Northwest, Valley Medical Center, UW Physicians, the HIPAA Covered Entity and the UW School of Medicine. Interfaces include other university compliance offices on issues involving UW Medicine constituents and entities.

Program functions including but not limited to daily operations of the program, development, implementation, and maintenance of policies and procedures, monitoring program compliance, risk assessment and mitigation, investigation and tracking of incidents and breaches and insuring patients' rights in compliance with federal and state laws, education/outreach, regulatory monitoring and program modification, and on-going evaluation and reporting of program effectiveness.

UW Medicine Compliance operates under the strategic guidance of the Chief Compliance Officer, UW Medicine/ Associate Vice President for Medical Affairs, UW (CCO/AVPMA). Compliance Officers with specific subject matter expertise direct program activities, report directly to the CCO/AVPMA and have dotted-line relationships with entity executives.

Position Purpose

UW Medicine's mission is to improve the health of the public by advancing medical knowledge, providing outstanding primary and specialty care to the people of the region, and preparing tomorrow's physicians, scientists and other health professionals. UW Medicine owns or operates UW Medical Center, Harborview Medical Center, Northwest Hospital & Medical Center, Valley Medical Center, UW Physicians (UWP,) UW Neighborhood Clinics (UWNC), UW School of Medicine, Airlift Northwest (Airlift), and other owned, operated or affiliated entities, interests and networks, including the healthcare components of the University of Washington. In addition, UW Medicine shares in the ownership and governance of Children's University Medical Group and Seattle Cancer Care Alliance -a partnership among UW Medicine, Fred Hutchinson Cancer Research, and Seattle Children's (all, the Entities). This position serves two primary roles: 1) oversee professional billing integrity for all entities comprising UW Medicine; and (2) provide strategic and operational oversight and maintenances of the compliance

program at UWP. This includes developing and reporting on compliance related activities and metrics to the UWP Executive Committee, UWP Compliance Committee and UWP Board.

Position Complexities

UW Medicine Compliance oversees the maintenance, coordination, and development of a central compliance program and Entity compliance programs across the wide range of regulatory compliance risk areas faced by UW Medicine, including clinical billing integrity, fraud, waste and abuse prevention (facility and professional fee clinical documentation/coding/billing, clinical research billing,) conflicts of interest, Stark/AntiKickback/False Claims Act, privacy and information security, EMTALA, ethics and professionalism, and industry relations. Program functions include development of governance and policies standards, education and training, auditing and monitoring, reporting mechanisms, investigations, enforcement, risk assessment and mitigation, regulatory monitoring and program modification, and on-going evaluation and reporting of program effectiveness.

Position Dimensions and Impact to University

UW Medicine Compliance also interfaces with other University of Washington compliance functions on issues involving UW Medicine constituents and Entities (e.g., human and animal subject protection programs, research integrity, environmental health and safety, grants and contracts, student information, non-HIPAA privacy). Reporting to the CCO/AVPMA, the Director, Professional Billing Integrity and UWP Compliance Officer has a strong dotted line relationship with the President and Executive Director of UWP and their respective leadership teams who are accountable for the operational success of compliance programs in their Entities

Duties and Responsibilities

Professional Billing Integrity Director and UWP Compliance Officer:

1. Responsible for the planning and strategic standard development, oversees implementation and ensures continuous performance and improvement of the Professional Billing Integrity team at UW Medicine Compliance, which includes UWP.
2. Provide direct support and assistance of professional billing matters to all UW Medicine entities.
3. Establish cooperative and collaborative relationships within UW Medicine Compliance department and other relevant regulatory UW Medicine functions on matters of shared concern.
5. Serve as in-house professional billing expert to all of UW Medicine. Maintains awareness of laws/regulations, status of current enforcement initiatives, and best practices to ensure program integrity.

Compliance Program Leadership:

6. Serve as a member of the Compliance department leadership team, working closely with other leaders to develop and make strategic decision to achieve efficiencies and effectiveness throughout UW Medicine and the overall UW Medicine Compliance department and program, by managing, designing, and continuously improving people, process, and technology approaches, and by strategically managing unit budgets and resource planning.
7. Provide strategic oversight of staff responsible for daily program activities, directly supervises staff as needed; provide leadership, mentoring, staff development and performance management; take disciplinary action as needed in consultation with the human resource department.

8. Conceptualize, design, develop, and create and present on program activities, risk assessments and incidents to the CCO/AVPMA, UW Medicine Vice Presidents, UW Medicine entity and senior leaders and UWP leaders.
9. Convene constituent and entity-based compliance committees and work groups as needed.
10. Participate in institution-wide initiatives, process improvement projects, and policy implementation processes as necessary; serve on committees and taskforces as assigned.
11. Serve as contact with legal counsel and the Attorney General's Office regarding related compliance strategies and responses to legal issues.
12. Represent the CCO/AVPMA as necessary and performs other duties as assigned.

Required Qualifications

- Master's degree and three years of progressively responsible experience in developing, implementing and administering compliance program in a complex healthcare, academic and/or governmental environment. Additional experience may substitute for educational requirements.
- 10 years cumulative experience in a complex healthcare, academic and/or governmental environment
- Professional healthcare compliance, coding and/or auditing certification
- Demonstrated excellence in problem solving and critical thinking, conducting effective investigations, and leading interdisciplinary teams
- Demonstrated success in managing a team of people, leading projects/initiatives, designing work processes, and implementing programs within a multifaceted, highly matrixed organization
- Demonstrated ability in implementing projects collaboratively, without direct supervision or authority over work group members
- Demonstrated ability to independently prioritize and organize work, work collaboratively in a diverse environment and to facilitate consensus on shared goals, in difficult situations with challenging personnel
- Demonstrated ability to communicate effectively, both verbally and in writing, with employees, medical staff, board members and external parties; strong presentation skills
- Advanced knowledge of federal and state healthcare regulations governing fraud, waste & abuse, patient privacy and information security, and other regulatory and contractual requirements in healthcare
- Advanced knowledge of best practices for ensuring the integrity and effectiveness of compliance programs
- Basic knowledge of business and management principles of healthcare and competence in basic computer skills.

Preferred Qualifications:

- Advanced degree in healthcare or business administration, public health or policy, or law.

CONDITION OF EMPLOYMENT

UW Medicine Compliance manages a significant volume of audits, inquiries and consultations. Work priorities shift in response to fluctuating demands. Full time schedules are assumed to be at least 40 hours, however, incumbents are expected to remain flexible to accommodate the unit's goals and mission, and to work beyond their normal schedule when necessary.

F. Compliance Roles and Responsibilities

INDIVIDUAL	CHAIRS, DIRECTORS,	SENIOR LEADERS	COMPLIANCE
<ul style="list-style-type: none"> • Practice personal, professional, ethical and legal accountability • Understand role-specific responsibilities and applicable policies and procedures; complete all required training • Comply with University of Washington (UW) policies and procedures • Protect patient privacy, safeguard confidential information and utilize appropriate technical controls; observe access rights and restrictions • Report compliance concerns and potential compromises of confidential information to administration or compliance; cooperate fully with investigations 	<ul style="list-style-type: none"> • Convey accountability expectations to direct reports • Monitor compliance with UW policies and procedures • Ensure direct reports understand their roles, responsibilities and applicable policies and procedures; enforce onboarding and annual refresher training requirements • Oversee operational implementation of compliance policies and procedures; improve audit results • Actively manage data access rights; monitor use of appropriate safeguards and controls; comply with risk management decisions • Address concerns and/or refer to compliance; implement corrective actions and sanctions 	<ul style="list-style-type: none"> • Provide active leadership; establish accountability expectations and professional standards; allocate resources for compliance program activities • Approve UW Medicine policies; support education and outreach activities; convey implementation expectations to operational areas • Enforce compliance; evaluate audit findings and convey expectations for improved results • Participate in risk assessment process; evaluate results; determine systemwide risk tolerance; make risk management decisions • Receive investigative reports; evaluate findings and determine appropriate corrective actions and sanctions 	<ul style="list-style-type: none"> • Maintain effective compliance programs to prevent, detect and resolve noncompliance with federal and state laws and UW policies • Establish UW Medicine compliance policies, education and outreach strategies, internal controls, audit plans and implementation tools • Audit compliance with UW Medicine policies and internal controls; report findings; analyze trends • Assess compliance risks using internal and external data, trends and regulatory developments; recommend program modifications • Investigate suspected noncompliance with UW Medicine policies; notify affected unit heads and senior leaders; report findings; analyze trends

UW Medicine

UW Medicine Compliance Code of Conduct

PREAMBLE

UW Medicine¹ 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 and without regard to race, color, creed, age, sex, gender identity or expression, genetic information, national origin, cultural affiliation, citizenship, pregnancy, marital status, sexual orientation, disability, veteran status or religion.

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. 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 closely relates to, but is not intended to replace, the Professionalism Policy.

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

¹UW Medicine is the academic medical center of the University of Washington. UW Medicine is comprised of the following:

- Airlift Northwest
- Harborview Medical Center
- UW Medical Center
- UW Neighborhood Clinics
- UW Physicians
- UW School of Medicine
- Valley Medical Center
- UW Medicine Shared Services

Medicine workforce members exhibit conduct 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, billing and accounting 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 Emergency Medical Treatment and Active Labor Act (EMTALA) 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 individuals in the enterprise 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. Practice Data Stewardship

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 practicing data stewardship. This includes taking the 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.

7. Appropriate Use of UW Medicine Resources and Assets

UW Medicine assets, including finances, equipment, human resources, facilities, and technologies are entrusted to individuals during the course of their work and must be used responsibly and appropriately. UW Medicine is a complex organization – some individuals are governed by Washington State ethics law, and others are governed by entity-specific policies regarding the use of resources and assets. All individuals 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

Individuals in UW Medicine may be exposed to situations that present potential or actual conflicts of interest. A conflict of interest may occur if outside activities or personal interests influence or appear to influence the ability to make objective decisions in the course of a UW Medicine workforce member's job responsibilities. A conflict of interest may also exist if the demands of any outside activities hinder or distract from the performance of a workforce member's job or cause the individual to use UW Medicine resources for other than UW Medicine purposes. While the specific requirements for disclosing and managing conflicts of interest are provided in policies, guidance documents, and established procedures for each constituent group, individuals should adhere to the following basic principles:

- a. Avoid situations that may constitute a conflict of interest, including but not limited to:
 - conducting UW Medicine business with entities in which an individual 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

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

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

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.