

UW Healthcare Component Compliance Group

Date: 1-21-14

Time: 1:00 pm

Location: T-269

Name	✓	Affiliation
Dave Anderson	○	HS Administration
Peggy Smith	✓	HS Administration
Jane Yung	✓	Attorney General's Office
Sue Clausen	✓	UW Medicine Compliance
Nancy Alarcon	○	Speech & Hearing Sciences
Anish Padath	✓	EH&S
Suzanne Mason		EH&S
Tara Aal	✓	School of Dentistry
Jerry Arnold		School of Dentistry
Cathy Brock	○	Autism Center <i>Alicia Giunta</i>
Michele Jacobs	✓	Psychology
Katie Korslund	○	Psychology
Amanda Patrick	✓	Psychology
Jon Hauser	✓	Psychology
Jeri Carter	○	UW Tacoma Student Wellness
Paul Henderson		UW Medicine IT
John Soltys*	✓	UW Medicine ITS Security Operations
Christene James		Pharmacy
Ann Nagel	○	CISO

Agenda

- Internal Audit 2014 schedule
 - 3-4 volunteers for spring/summer for friendly, informational visit
 - Notify Peggy following meeting or assignments pending
- Health Sciences Administration clinic visits in 2014 (Dave Anderson)
 - UW Tacoma completed 12-2013
 - Volunteers, best method for scheduling?
- Business Associate Agreement revisions scheduled for September 2014
 - Pending poll for signing authority/current process
 - Work with individual components' purchasing unit to ensure compliance
 - Exclusion lists update:
 - UW Purchasing & Procurement
 - Checks for any order >10K on federal budget or any federal master contract
 - Suggests checking OIG and SAM federal debarment lists for small dollar orders from our components (see below)
 - State of Washington currently developing a state-wide debarment process for vendors/suppliers (pending finalization)
 - Procurement Services can review statutory requirements if provided latest version – will verify that there are not additional lists component should review for exclusions beyond the 2 familiar lists (Carla Helm)
 - UW Medicine Compliance (Sue Clausen – BAAs that do not go through Purchasing)
 - All contracts that go through HMC Supply Chain are checked against OIG exclusion list whether or not they require a BAA
 - Contracts that do not go through Supply Chain (don't involve expenditure of funds or detailed terms & conditions and unlikely to require BAA) unknown

- Sue Clausen recognizes safeguards but not applied to every transaction; added to gap analysis of exclusion checking
- Breach notification policy
 - Revisit or clear?
 - New HSA website compliance page suggestions

Resources

UW Medicine Business Associate Agreement: http://depts.washington.edu/comply/hipaa_ba.shtml

SAM federal debarment list; type in entity name to generate current exclusions

https://www.sam.gov/portal/public/SAM/?portal:componentId=7d526634-bb8c-40f9-a579-7061ad3477ac&portal:type=action&navigationalstate=JBPNS_r00ABXdcACJqYXZheC5mYWNlcy5wb3J0bGV0YnJpZGdILINUQVRFX0IEAAAAAQApdmlldzo0MmU5MjUwMS05ZTg0LTRkZDUtYjYy1iMjM0MjAxMDNmZDgAB19fRU9GX18*&interactionstate=JBPNS_r00ABXc0ABBfanNmQnJpZGdlVmllld0lKAAAAAQATL2pzZi9uYXZpZ2F0aW9uLmpzcAAHX19FT0ZfXw**#1

OIG exclusions database <http://exclusions.oig.hhs.gov/>