



**Administrative Policy**  
**2023-10 Healthcare Compliance & Privacy Program –**  
**Oversight and Enforcement**

<b>Title</b>	Healthcare Compliance & Privacy Program – Oversight and Enforcement
<b>Policy Owner and Contact Information</b>	Office of Healthcare Compliance & Privacy Phone: 860-679-6060    Email: <a href="mailto:ohcp@uchc.edu">ohcp@uchc.edu</a> <a href="#">Home   Office of Healthcare Compliance &amp; Privacy (uconn.edu)</a>
<b>Campus Applicability</b>	All UConn Health campuses, including John Dempsey Hospital
<b>Applies to</b>	UConn Health Workforce Members
<b>Effective Date</b>	September 21, 2023

**PURPOSE:**

This document defines and describes levels of responsibility for oversight and enforcement of the University of Connecticut Healthcare Compliance & Privacy Program (the “Program”).

**POLICY STATEMENT:**

**1. University of Connecticut Board of Trustees’ and University of Connecticut Health Center Board of Directors’ Joint Audit and Compliance Committee (JACC)**

The JACC shall act as the governing body for the Program by advising and supporting the Chief Healthcare Compliance & Privacy Officer and providing oversight and enforcement of the Program. The JACC shall oversee and monitor the activities and effectiveness of the Program through reports of high-level summaries of the Program’s activities and initiatives, including significant findings and recommendations.

**2. University of Connecticut: Healthcare Compliance & Privacy Committee**

The University of Connecticut: Healthcare Compliance & Privacy Committee shall provide assistance, advice, and guidance to the Chief Healthcare Compliance & Privacy Officer on matters relating to responsibility and implementation of the Program with the goal of promoting and fostering a strong institutional culture of healthcare compliance, privacy, and integrity. This Committee shall include various management members from several operational areas to raise concerns, promote awareness, and offer solutions to issues as they arise, and this Committee shall oversee implementation of the Program for UConn and UConn Health business units rendering clinical services and/or clinical research/clinical trials.

**3. Chief Healthcare Compliance & Privacy Officer**

The Chief Healthcare Compliance & Privacy Officer shall report directly to the UConn Health Chief Executive Officer (CEO), Vice President for Health Affairs. The Chief Healthcare Compliance &

Privacy Officer shall report out at least quarterly and as often as needed to the JACC on Program-related matters and shall serve as Chair of the University of Connecticut: Healthcare Compliance & Privacy Committee. The Chief Healthcare Compliance & Privacy Officer shall have direct access to the CEO, the governing body, senior management, and legal counsel. The Chief Healthcare Compliance & Privacy Officer shall act as the focal point for Program-related activities and shall possess the authority to carry out operational responsibilities relating to the Program.

**4. Office of Healthcare Compliance & Privacy**

The Office of Healthcare Compliance & Privacy (OHCP) shall supply the workforce needed to fulfill obligations of the Program and to continuously develop the elements of the Program in accordance with laws, rules, regulations, and the needs of the University of Connecticut. The OHCP shall provide guidance to management regarding laws, rules, regulations, and best practices for upholding Program-related compliance in operations. Annual work plans developed by the OHCP shall incorporate risk assessment results, considerations from the US Department of Health and Human Services Office of Inspector General's (OIG) work plan, Office for Civil Rights (OCR) enforcement actions, Connecticut state laws, and projects aimed at supporting patient safety, the provision of quality care, and ethical conduct as expected by the University of Connecticut and as outlined in the Code of Conduct.

**5. Management**

Management shall maintain responsibility for ensuring that operational activities comply with applicable Program-related laws, rules, regulations, and policies. Management shall oversee implementation and enforcement of Program-related requirements in operations.

**DEFINITIONS:**

**Workforce Member:** Employees, volunteers, trainees, and other persons whose conduct, in the performance of work for UConn Health, is under the direct control of UConn Health, whether or not they are paid by UConn Health.

**REFERENCES:**

OIG Supplemental Compliance Program Guidance for Hospitals, Vol 70, 4858 FR, No. 19 (Jan. 31, 2005).  
Publication of the OIG Compliance Program Guidance for Hospitals, Vol. 63, 8987 FR, No. 35 (Feb. 23, 1998).

**PROCEDURES/FORMS:**

None

**RELATED POLICIES:**

Healthcare Compliance & Privacy Program Policy

**ENFORCEMENT:**

Violations of this policy or associated procedures may result in appropriate disciplinary measures in accordance with University By-Laws, General Rules of Conduct for All University Employees, applicable collective bargaining agreements, the University of Connecticut Student Code, other applicable University Policies, or as outlined in any procedures document related to this policy.

**APPROVAL:**

Bruce Liang (Signed)  
Bruce Liang, MD, FACC  
Interim Chief Executive Officer, UConn Health  
Executive Vice President for Health Affairs

9/21/2023  
Date

Elle Box (Signed)  
Elle Box  
Chief Healthcare Compliance & Privacy Officer  
Administrative Policy Committee Co-Chair

9/18/2023  
Date

Janel Simpson (Signed)  
Janel Simpson  
Chief Administrative Officer  
Administrative Policy Committee Co-Chair

9/19/2023  
Date

**POLICY HISTORY:**

**New Policy Approved:** 9/23

**Revisions:**

**Reviewed Without Changes:**