

Office of the President

TO MEMBERS OF THE COMPLIANCE AND AUDIT COMMITTEE:

DISCUSSION ITEM

For Meeting of September 13, 2017

ETHICS AND COMPLIANCE ACTIVITIES REPORT

2017-18 Compliance Work Plan Updates: Health Sciences Risk Priority Areas

At the July 2017 meeting, the Compliance and Audit Committee approved the Ethics and Compliance Program Plan for 2017-18 (“Work Plan”). The Office of Ethics, Compliance and Audit Services (ECAS) is now engaging with various campus and medical center compliance offices to implement identified risk mitigation strategies. Additionally, ECAS will recommend updates to the Work Plan from time to time in response to emerging systemwide compliance risks. This presentation will focus on activities and updates for the following health sciences risk priority areas:

- (1) Pharmacy: Conflicts of Interest (COI) – The approved Work Plan identified several compliance risks related to Pharmacy Services. Based on recent collaboration with the Office of the General Counsel, UC Health, and Risk Services, ECAS is proposing to revise the Work Plan to add COI as a new risk priority area. This will permit ECAS to devote resources to systemwide efforts aimed at developing related compliance policies, training, and oversight mechanisms.
- (2) Privacy: HIPAA Privacy Rule monitoring – The University of California is a single Covered Entity as defined by the Health Insurance Portability and Accountability Act (HIPAA). Accordingly, privacy officials at UC’s various medical centers and campus locations must work together to ensure consistency in regulatory interpretation of the HIPAA Privacy Rule. ECAS and the UC Healthcare Compliance Council are implementing new governance strategies to increase communication and collaboration, including in the areas of vendor management and privacy breach response.