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Northwest Kidney Centers Compliance & Privacy Program



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Contents

Preface..... 3

Board Policy Statement 4

Who We Are 5

 About Us..... 5

 Our History..... 5

 Our Mission 5

 Our Values 5

 Annual Quality Reports 6

 Research..... 6

 Patient Care..... 6

 Professional Services..... 6

 Pharmacy Services..... 6

 Supply, Administrative and Medical Service Vendors..... 6

Introduction 7

 Scope 8

 Compliance & Privacy Program Revisions..... 9

Compliance & Privacy Program 10

 Compliance Officer..... 10

 Standards of Professionalism 11

 Compliance Policies and Procedures..... 12

 Training and Education 12

 Open Lines of Communication..... 13

 Routine Monitoring and Auditing 13

 Compliance & Privacy Program Updates and Effectiveness Reviews 14

 Disciplinary Guidelines..... 14

 Reporting Compliance Concerns 14

 Responding to Compliance Issues..... 14

 Corrective Action Planning..... 14

 Responsibility..... 15

 Timeline..... 15

 Questions..... 15

Appendix B – Federal and State Health Care Laws 17

 HIPAA Privacy, Security and Transactions and Code Sets 17

Self-Referral 17
Anti-Kickback Statute..... 17
Federal False Claims Act 17
Office of Inspector General Exclusions Program 18
Washington State Medicaid Fraud False Claims Act..... 18
Washington State Provider Termination and Exclusion List..... 18
Washington State Data Privacy Laws 18

Preface

Northwest Kidney Centers takes seriously the commitment to conduct all business affairs with integrity and in compliance with federal and state laws and private payer health plan requirements. Our policies on ethical and legal conduct are designed to prevent, detect and correct any observed or reported violations of our standards, policies and the law. The Code of Conduct and other related policies reflect this commitment.

Our Compliance & Privacy Program is designed to ensure our operations conform to federal and state regulatory efforts that promote the privacy and security of patient information and prevent and detect fraud, waste, and abuse within the healthcare industry.

The term “workforce” is used throughout this document and is meant to include Board Members, employees, medical staff, and volunteers. The Code of Conduct applies equally to our workforce and to vendors. Reference to our Leadership means our workforce members in supervisory or managerial roles. Our Executive Leadership includes our Vice Presidents, the Chief Medical Officer, and the Chief Executive Officer.

Our workforce and medical staff are entrusted with the responsibility of achieving compliance with the Code of Conduct, standards, policies and the law. All workforce members, individuals, and vendors contracted to provide products, administrative, and medical services on behalf of Northwest Kidney Centers, are expected to comply with our standards policies, and the law. Our Leadership Team is responsible for ensuring that the workforce understands and follow the Code of Conduct, our standards, policies and the law.

For additional information on the Northwest Kidney Centers Compliance & Privacy Program, please contact Alan Brandon, Compliance/Privacy Officer at 206-720-8806.

Board Policy Statement

In February 2001, the Northwest Kidney Centers Board of Trustees adopted a resolution authorizing the creation and implementation of a Compliance Program designed to promote adherence to and prevent and detect violations of applicable laws by our workforce and vendors. Since that time, program enhancements include implementing standards to protect the privacy and security of patient data while complying with applicable regulatory requirements.

The Northwest Kidney Centers Code of Conduct promotes ethical, legal and professional behavior by all workforce members and vendors. These behaviors support our mission to promote the optimal health, quality of life, and independence of people with kidney disease through quality patient care, education and research.

The Code of Conduct provides guidance to our workforce and vendors about their responsibility to comply with all applicable federal, state and local laws as well as Northwest Kidney Centers' policies and procedures.

We expect everyone to perform all aspects of his or her jobs ethically, legally, and professionally, and to notify a member of our Leadership team or the Compliance Officer if they witness anything that is inconsistent with our values or contrary to applicable standards, policies, and laws.

Updated and Revised, September 2019

Who We Are

About Us

Founded in Seattle, Washington in 1962, we are the world's first dialysis organization. We are the provider of choice within the communities which we operate because of our high-quality services, community connections, and generous donor support. We provide more than 250,000 dialysis treatments each year for 1,700 patients who chose to dialyze in one of our centers or at home with our support. In 1981 we began providing dialysis treatment for patients at local hospitals, and we continue that practice today. Our hospital services team provides 14,000 dialysis treatments each year to patients in hospitals across King County.

Our History

For more than half a century, we have worked to improve the lives of people with kidney disease. Our story begins with one piece of breakthrough research. In 1960, University of Washington physician Dr. Belding H. Scribner, who would later help found Northwest Kidney Centers, developed a way to make long-term dialysis possible for the first time. His 'Scribner shunt' has saved thousands of lives and inspired our ongoing commitment to improving the lives of people with kidney disease.

Our Mission

To promote the optimal health, quality of life and independence of people with kidney disease through patient care, education, and research.

Our Values

Team Work - We strive to work together to provide respectful, quality care to all patients. As professionals, we respect one another.

Excellence - Northwest Kidney Centers is committed to providing quality professional services that promote the optimal health, quality of life and independence of people with kidney disease.

Integrity - We comply with all laws, rules, and regulations. We honor and respect personal integrity. All workforce members and vendors can raise concerns regarding integrity without fear of retaliation.

Respect - We are committed to providing community-based services throughout the region. We meet or exceed standards of care while maintaining compliance with relevant laws and regulations.

Stewardship - Northwest Kidney Centers seeks to be a good steward of state and federal funds, physical resources, donors' gifts, our nonprofit position in the community, and the trust placed in us by the people we serve.

Annual Quality Reports

Our patients deserve the best possible care. That's why we make quality a top priority and measure it with the nationwide 5-star system, twice-a-year patient experience surveys, and federal Dialysis Facility Reports. Based on 2016 performance outcomes in seven key quality areas, we earned an average of 4.6 stars on a 5-star scale. Ten of our 15 clinics received 5 stars. In all, 93% of our clinics are rated 4 or 5 stars.

Research

Research has fueled our work since the very beginning. From developing the world's first home dialysis program to introducing revolutionary new treatments, our progress is rooted in the pioneering work of doctors and scientists.

Patient Care

We are committed to ethical principles and the highest degree of professional values. We take pride in our efforts to comply with laws and regulations as they relate to patient care. We recognize the privilege and responsibilities that come with providing patient care and the importance of accurate billing for patient care services.

Professional Services

We understand and follow relevant rules for submitting charges for medically necessary items and services. Our workforce provides patient care that is appropriate to the complexity of patient needs. We thoroughly document all medical services according to the appropriate third-party billing requirements.

Pharmacy Services

We provide high-quality pharmacy services to our patients in compliance with federal, state and local regulatory requirements. We have a broad suite of policies and procedures that cover the prescribing and administration of patient medications.

Supply, Administrative and Medical Service Vendors

We engage a variety of supply vendors and administrative service vendors to assist in our efforts to provide quality care to our patients. Vendors are an important part of our service delivery model, and as such we expect all vendors to perform their respective functions according to our standards, policies and the law.

Introduction

The Northwest Kidney Centers Values of teamwork, excellence, integrity, respect and stewardship are the guiding principles that define our organization. These values are upheld by all Northwest Kidney Centers workforce members. We require vendors and consultants to abide by our standards, policies, and to act in accordance with the law when performing services on behalf of Northwest Kidney Centers. We do not allow vendor influence to drive our business decisions.

The primary benefit of our Compliance & Privacy Program is to ensure that Northwest Kidney Centers promotes the optimal health, quality of life, and independence of people with kidney disease while operating within ethical and legal boundaries. We believe that a clearly stated Compliance & Privacy Program makes good business sense and helps us focus on our fundamental care-giving mission to our patients and the community. The benefits of our Compliance & Privacy Program include:

- Promoting a culture of ethical behavior.
- Providing clear and understandable information about our commitment to upholding responsible provider and corporate conduct.
- Providing an accurate view of our workforce members behavior relating to fraud and abuse.
- Preventing and identifying criminal and unethical conduct.
- Protecting the privacy and security of our patient data.
- Improving the quality of patient care.
- Creating a culture of responsibility to prevent, detect and correct any identified compliance or privacy problems without fear of retaliation.
- Providing compliance and privacy training to our workforce members, both at the time of hire and annually thereafter.
- Developing a method that encourages workforce members and vendors to report suspected problems or ask questions about perceived inappropriate behavior or activities.
- Developing procedures that allow a prompt and thorough investigation of alleged problems by workforce members.
- Initiating immediate and appropriate corrective actions when needed.

Scope

Our Compliance & Privacy Program is designed to promote our efforts regarding compliance communication, investigation, corrective action, and oversight monitoring. The program is not about simply learning and following the rules; it is intended to promote a culture that identifies the rules, creates internal directives to comply with applicable governmental and payer rules, and to communicate that information to our workforce and vendors.

The Compliance & Privacy Program compliments a variety of Northwest Kidney Centers policies including, the Compliance & Privacy Program Code of Conduct Policy No. ADM-C12069A and the Conflict of Interest Policy No. ADM-C12069.

Compliance & Privacy Program Structure

The Compliance & Privacy Program is intended to be a guide to workforce members and vendors outlining Northwest Kidney Centers' compliance standards and objectives. The content applies to all workforce members and vendors.

We are committed to ethical principles, institutional values, and compliance with laws and regulations. We recognize the privilege and responsibilities that come with providing patient care and the importance of accurately billing for patient care items and services. This Compliance & Privacy Program is designed:

- To ensure that all workforce members and vendors share in the responsibility to keep Northwest Kidney Centers in compliance with all applicable laws, regulations, and policies governing business practices and patient care, including protecting the privacy and security of our patient data.
- To communicate the commitment of Northwest Kidney Centers Board of Trustees and Leadership to act in accordance with our policies governing ethical business and professional practices.
- To familiarize all Northwest Kidney Centers' workforce members and vendors with ethical standards of behavior expected in the workplace.

We believe that it is imperative always to hold ourselves accountable for the integrity of the decisions we make and the ensuing actions.

Resolution of Problems and Concerns

Northwest Kidney Centers' patients receive information about their patient rights and the grievance process when they start treatment with us and at least annually thereafter. Our patients may share concerns, make a

complaint or file a grievance by contacting a Northwest Kidney Centers clinic representative or a social worker. The NKC patient ombudsman is another internal resource for patients if they feel that they did not get heard or the grievance was not handled to their satisfaction. Patients may also elevate their concerns by contacting the Northwest Renal Network or the Washington State Department of Health, outside agencies that provide oversight of dialysis units. Patient rights, grievance contact information, and Comment Cards are in each of our clinic's patient lobbies.

Compliance-related concerns should be addressed by following Northwest Kidney Centers' policies as outlined in the Employee Handbook and related compliance policies. These policies encourage workforce members to contact a member of our Leadership team to reach an acceptable resolution of compliance and ethics concerns they may have. Vendors are encouraged to report any observed to the Compliance Officer directly.

If a member of our workforce is uncomfortable with reporting a concern to leadership, they may contact the Compliance Officer for assistance, or they may use one of the other available reporting mechanisms such as:

- The Compliance Hotline (800-371-2174), a 24/7 toll-free phone line available to our workforce for use at any time, by name or anonymously, to report a compliance-related concern.
- Individuals, who in good faith, report a perceived violation of the Code of Conduct or other standards, policies or the law, are not be subjected to retaliation, retribution or harassment by any Northwest Kidney Centers workforce. Any workforce member who conducts or condones retribution, retaliation or harassment, in any way will be subject to disciplinary action up to and including discharge.

Compliance & Privacy Program Revisions

The Compliance & Privacy Program is intended to be flexible and readily adaptable to changes in regulatory requirements and industry best practices. The program is regularly reviewed to assess whether it is working, and it is modified when experience shows that a certain approach is not effective or suggests a better alternative. To facilitate appropriate revisions of the Compliance & Privacy Program, the Compliance Officer prepares an annual report to the Executive Compliance Committee and the Board Compliance Committee that describes the general compliance activities of the preceding year and identifies improvements made to enhance the effectiveness of the Compliance & Privacy Program in the upcoming year.

Compliance & Privacy Program

We base our Compliance & Privacy Program on federal and state guidelines, including the Code of Federal Regulations 45 CFR 160 – 164; Health and Human Services (HHS), Office of Inspector General (OIG) Compliance 101 and Provider Education guidance; and applicable sections of the Revised Code of Washington (RCW). Our Compliance & Privacy Program is modeled after Medicare and Medicaid policy guidance which states that a comprehensive Compliance & Privacy Program should include the Seven Elements of an Effective Compliance & Privacy Program. These elements include:

1. The implementation of documented policies, procedures, and a code of conduct to guide workforce members.
2. Designating a Compliance Officer and a Compliance Committee with the responsibility to oversee the Compliance & Privacy Program.
3. Focused and routine training and education.
4. Open and clear lines of communication.
5. An oversight monitoring and auditing process.
6. Enforcement of standards through established disciplinary guidelines.
7. Documented procedures for promptly responding to compliance issues.

Fostering and ensuring compliance with the Health Insurance Portability and Accountability Act (HIPAA) is an important part of the Compliance & Privacy Program. The HIPAA Privacy and Security rule requires due diligence and effective oversight of standards, processes, and systems that ensure the privacy and security of our patient information.

Compliance Officer

Northwest Kidney Centers has a dedicated Compliance Officer with the responsibility to develop, implement, and monitor the Compliance & Privacy Program.

The Compliance Officer works closely with representatives from various Northwest Kidney Centers' clinical units and administrative departments to foster and enhance compliance with all applicable standards, policies, and laws.

Some key activities of the Compliance Officer include:

- Supporting the Board Compliance Committee and leading the Executive Compliance Committee.
- Managing the annual conflict of interest survey.
- Creating compliance training and education materials, and delivering compliance training to our workforce.
- Documenting, reviewing and revising compliance policies.
- Conducting routine monitoring and auditing.
- Investigating inquiries concerning reports of non-compliance or violations of the Code of Conduct.
- Developing appropriate corrective action plans.
- Consulting with Information Security on HIPAA privacy and security requirements for patient data.

Standards of Professionalism

Respect each other as people and professionals

- Problems are promptly brought to the attention of persons in authority. If there are significant differences of opinion in professional judgment, these will be reported to the appropriate supervisor.
- We are productive during work time.
- We use the Northwest Kidney Centers phones and computers for limited personal use only on personal time (breaks and lunch).
- We use Northwest Kidney Centers resources prudently and for Northwest Kidney Centers purposes; we do not use patient-owned resources.
- We do not discriminate, harass, abuse or intimidate others.
- We protect the confidentiality of any person who files a confidential or anonymous complaint or concern, to the extent practical and allowed by law.
- We do not retaliate against anyone who, in good faith, files a complaint.
- We keep patient and workforce personal information confidential as required by State laws and HIPAA regulations.
- We maintain professional standards of practice for our workforce.

Avoiding conflicts of interest

- We maintain ethical business relationships with vendors.
- We strongly do not allow accepting vendor gifts.
- We do not do anything that would conflict with the interest of Northwest Kidney Centers or its patients.

Standards, policies and the law

- We know and, to the best of our knowledge, comply with all requirements of the Medicare ESRD Program and other applicable federal, state and local laws.
- We accurately document and bill for services provided to our patients.
- We comply with all Northwest Kidney Centers' policies and procedures.

Compliance Policies and Procedures

We maintain a suite of compliance policies and procedures designed to provide guidance to our workforce and vendors about basic compliance requirements. Our compliance policies and procedures include information about how to identify and prevent fraud and abuse and the importance of protecting the privacy of patient information. We review and update our compliance policies and procedures annually or sooner depending on regulatory changes, identified concerns, and industry best practices.

Training and Education

Our compliance training and education efforts include mandatory compliance training for all new workforce members within 30 days of employment. New workforce members receive a copy of the Code of Conduct and related compliance requirements.

All workforce members receive additional training specific to their work responsibilities. All workforce members are required to take an annual compliance refresher training course.

We provide our Compliance training and education cover areas of focus related to:

- How to recognize and report noncompliance;
- Understanding the Northwest Kidney Centers no tolerance for retaliation policy for good faith efforts reporting instances of suspected noncompliance;
- Understanding relevant healthcare laws and statutes including:

- Stark Law;
 - The Anti-Kickback Statute;
 - False Claims Act;
 - Health Care Fraud Statute;
 - Civil Monetary Penalties Law; and
 - Health Insurance Portability and Accountability Act (HIPAA).
- Federal health care program exclusion requirements; and
 - Identity Theft detection and prevention.

Compliance education consists of a variety of communication efforts including email campaigns, documented policies, and procedures, information and compliance information posters, and flyers. We encourage our leadership team to include informal compliance discussions in routine staff meetings.

Open Lines of Communication

We encourage workforce members to freely discuss compliance requirements and concerns directly with their supervisor, manager, and organization leaders, or with the Compliance Officer. Workforce members may report noncompliance concerns anonymously via a toll-free Compliance Hotline at 800-371-2174. The Compliance Hotline is intended to be used as a means of actual or perceived noncompliant activity.

It is Northwest Kidney Centers' policy that workforce members may make good faith reports of suspected noncompliance without fear of retaliation. Our non-retaliation philosophy applies to the reporting of any suspected compliance violation, regardless of whether it is reported to the Compliance Hotline or in person. All reports made to the Compliance Hotline are held confidential to the extent practical and allowed by law. Workforce members may also report instances of suspected noncompliance directly to the Compliance Officer by sending a confidential email to compliance@nwkidney.org.

Routine Monitoring and Auditing

Our Compliance Officer is responsible for maintaining and overseeing routine compliance monitoring and auditing. Part of the monitoring and auditing plan involves making sure documented policies and procedures are routinely updated, monitoring corrective action plans related to adverse findings, ensuring noncompliance is identified and appropriately addressed, and

ensuring noncompliance doesn't reoccur or occur in another area of the organization.

Compliance & Privacy Program Updates and Effectiveness Reviews

We stay current with changes in laws, regulations, and third-party payer requirements. The Compliance & Privacy Program is modified as needed to conform to changing requirements. We periodically measure and report on the effectiveness of the Compliance & Privacy Program and make modifications when improvement opportunities are identified.

Disciplinary Guidelines

Our Human Resources professionals have established policies and procedures for disciplinary actions related to workforce member noncompliance. Instances of noncompliance are evaluated on a case-by-case basis, and progressive, appropriate and consistent corrective action is based on the facts and circumstances. Corrective action may include additional education, loss of privileges or other disciplinary measures up to and including discharge.

Reporting Compliance Concerns

All Northwest Kidney Centers' workforce members and vendors who observe what they perceive to be noncompliant conduct must report such observations directly to a supervisor or manager, to the Compliance Officer, or through the Compliance Hotline as outlined in the Reporting Noncompliance Conduct the Investigating Noncompliance Conduct Policy ADM-R12052.

Responding to Compliance Issues

The Compliance Officer reviews our procedures for responding to reported or discovered compliance concerns. Our compliance oversight processes include actively preventing and detecting noncompliance throughout the organization. Instances of noncompliance are logged, investigated and appropriate action is taken to mitigate negative effects. Compliance & Privacy Program activities and reports of noncompliance are reported to the Executive Compliance Committee and Board Compliance Committee.

Whenever conduct that may be inconsistent with Northwest Kidney Centers' compliance standards and policies, and the law it is reported to the Compliance Officer, an investigation is undertaken according to Policy ADM-I12055. Depending on the extent of the compliance issue, appropriate notification to law enforcement and regulatory agencies will be made.

Corrective Action Planning

Whenever a compliance issue is identified, through monitoring and auditing, reporting of possible issues, investigations or otherwise, the Compliance

Officer develops a plan to address that issue. In developing a corrective action plan, the Compliance Officer may obtain advice and guidance from the Executive Compliance Committee and the Board Compliance Committee.

Our corrective action plans are designed to ensure that noncompliant behavior is addressed and that similar problems do not reoccur or occur in other areas of the organization. If individuals repeatedly engage in practices that raise compliance concerns, corrective action planning will include representatives from Human Resources and will identify actions taken to prevent such activities, as appropriate and according to Northwest Kidney Centers' disciplinary standards.

Compliance Work Plan

Northwest Kidney Centers understands that identifying and managing compliance risk is part of being a responsible provider of resources from our Donors and third-party payers. We focus our compliance activities on addressing high-risk areas within the organization by:

- Conducting focused compliance training;
- Documenting, reviewing and revising policies and procedures;
- Monitoring and auditing to detect noncompliance; and
- Taking corrective action to address instances of noncompliance.

The work plan focuses on activities that strengthen and enhance the effectiveness of our Compliance & Privacy Program.

Responsibility

The Northwest Kidney Centers Compliance Officer is responsible for ensuring the completion of the work plan. The Compliance Officer may delegate responsibility for a specific task to other departments or individuals, as appropriate.

Timeline

The work plan identifies each activity that is to be completed throughout the fiscal year, including scheduling activities, conducting monitoring reviews, and summarizing and reporting Compliance & Privacy Program status.

Questions

For questions or to provide comments about the work plan or the Compliance & Privacy Program contact Alan Brandon, Compliance Officer at 206-720-8806 or compliance@nwkidney.org.

Appendix A – Compliance Policies and Procedures

- Compliance & Privacy Program Code of Conduct – ADM-C12069A
- Compliance Education – ADM-C12051
- Compliance Hotline – ADM-C12053
- Compliance Monitoring and Auditing – ADM-M12058
- Conflict of Interest – ADM-C12069
- Detecting and Preventing Fraud Waste and Abuse – ADM-D12070
- Identity Theft Detection, Prevention Mitigation – ADM-I12084
- Investigating Noncompliant Conduct – ADM-I12055
- Reporting Noncompliant Conduct to Authorities – ADM-R12056
- Responding to Compliance Hotline – ADM-R12054

Appendix B – Federal and State Health Care Laws

Northwest Kidney Centers has policies and information that discuss the detecting and preventing fraud, waste, and abuse as well as the rights of workforce members to be protected as whistleblowers. This information can be found in various places including Northwest Kidney Code of Conduct Policy No. ADM-C12069A.

HIPAA Privacy, Security and Transactions and Code Sets

We comply with the Health Insurance Portability and Accountability Act of 1996 (HIPAA), The American Recovery and Reinvestment Act of 2009 (Pub. L 111-5), the Medical Records – Health Care Information Access and Disclosure act RCW 70.02, Washington State Governor’s Executive Order 00-03 Public Records Privacy Protections EO 00-03, the Washington State Medicaid Fraud False Claims Act RCW 74.66 and other state and federal laws applicable to the privacy and security of individually identifiable information and personal health information.

Self-Referral

Section 1877 of the Social Security Act, also known as the “Stark Law,” prohibits a physician from referring a Medicare patient to an entity for certain “designated health services” if the physician has a “financial relationship” with the entity that bills Medicare unless an exception applies. Some of the exceptions to this prohibition on referrals apply to the types of services provided pursuant to the referral, while other exceptions apply to the “financial relationship” between the physician and the entity billing Medicare.

Anti-Kickback Statute

The federal Anti-Kickback Statute (“Anti-Kickback Statute”) is a criminal statute that prohibits the exchange (or offer to exchange), of anything of value, to induce (or reward) the referral of federal health care program business. See 42 U.S.C. § 1320a-7b. The Anti-Kickback Statute is broadly drafted and establishes penalties for individuals and entities on both sides of the prohibited transaction.

Federal False Claims Act

The False Claims Act (FCA) is a federal statute that covers fraud involving any federally funded contract or program, including Medicare and Medicaid. The act establishes liability for any person who knowingly presents or causes to be presented a false or fraudulent claim to the government for payment. The act does not require proof of a specific intent to defraud the government. The FCA permits a person with knowledge of fraud against the US Government, referred to as the “qui tam plaintiff” (whistleblower), to file

a lawsuit on behalf of the government against the person or business that committed the fraud.

[Office of Inspector General Exclusions Program](#)

The Health and Human Services, Office of Inspector General has the authority to exclude individuals and entities from federally funded health care programs pursuant to section 1128 of the Social Security Act (and from Medicare and State health care programs under section 1156 of the Act) and maintains a list of all currently excluded individuals and entities called the List of Excluded Individuals/Entities (LEIE). Anyone who hires an individual or entity on the LEIE may be subject to civil monetary penalties.

[Washington State Medicaid Fraud False Claims Act](#)

The State of Washington allows whistleblowers to sue in the name of the State of Washington where a wrongdoer engages in conduct that defrauds the state or local government of its healthcare dollars. This statute is referred to as the Medicaid Fraud False Claims Act and is designed to address Medicaid fraud.

[Washington State Provider Termination and Exclusion List](#)

Individuals or entities whose participation in the Washington State Medicaid Program has been terminated for cause under the provision of WAC 182-502-0030 (HCA) or 388-71-0551; 388-71-0540; 388-71-0544; 388-110-260 (DSHS) may be excluded from participation in the Medicaid Program. Any provider who is terminated from the Medicaid Program, for any reason, is not permitted to provide services to Medicaid recipients.

[Washington State Data Privacy Laws](#)

Any person or business that conducts business in this state and that owns or licenses data that includes personal information shall disclose any breach of the security of the system following discovery or notification of the breach in the security of the data to any resident of this state whose personal information was, or is reasonably believed to have been, acquired by an unauthorized person and the personal information was not secured.



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