

**UC Riverside, School of Medicine Policies and Procedures****Policy Title:** Reporting Issues and Concerns Related to Policy-Based Restrictions at Affiliate Sites**Policy Number:** 950-02-029

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|-----------------------------|--------------------------------------|
| <b>Responsible Officer:</b> | Chief Compliance and Privacy Officer |
| <b>Responsible Office:</b>  | Compliance Advisory Services         |
| <b>Origination Date:</b>    | 02/05/2024                           |
| <b>Date of Revision:</b>    | N/A                                  |
| <b>Scope:</b>               | UCR Health                           |

**I. Policy Summary**

The University expects that UC employees and trainees will deliver evidence-based health care services. In those locations where a required service cannot be delivered because of a policy-based restriction, as defined under Regents Policy 4405, appropriate referrals or transfers must be made. If at any time a UCR School of Medicine faculty, employee, or trainee is asked to do otherwise, or a patient has a complaint or grievance related to care received or provided through a UCR Covered Affiliate, UCR may be immediately informed as described below. This Policy relies upon the existing robust channels at UCR for reporting, evaluation, escalation, and resolution of complaints and grievances. These channels are available regardless of whether the concern involves activities at Covered Affiliates under Regents Policy 4405 and the corresponding Presidential Policy on Affiliations with Certain Healthcare Organizations.

**II. Definitions**

**Affiliate:** A health care provider, health plan, or other entity that owns or operates an organization that provides Health Care Services in the United States and with which the UCR School of Medicine or UCR Health has established an Affiliation.

**Affiliation:** A contract or other arrangement between: (i) UCR and (ii) an Affiliate, through which the UCR, directly or through its Personnel or Trainees, provides Health Care Services, educates health professional trainees, or conducts research that involves the performance of Health Care Services.

**Covered Person or Organization:** A health care provider, health plan, or other person or organization owning or operating locations where Health Care Services are provided in the United States, that has adopted or operates pursuant to Policy-Based Restrictions on Health Care Services.

**Covered Affiliate:** A Covered Person or Organization with which UCR has established an Affiliation; the arrangement is a Covered Affiliation. Public Affiliates are not Covered Organizations under this policy.

**Policy-Based Restrictions:** Restrictions imposed by a Covered Affiliate, directly or through its governing body, sponsors, or other non-governmental authority, on Health Care Services within the scope of a health care provider's license. This term does not refer to services that the Covered Affiliate: (i) is barred from performing as a matter of federal or state law, federal or state agency directive, or applicable Accreditation Standard; (ii) is unable to provide to ANY patient due to absence of necessary equipment or qualified personnel, lack of applicable licensure or accreditation, or lack of financial resources; or (iii)

limits or restricts as a result of credentialing, privileging, and utilization review policies or processes consistent with California law and Medicare Conditions of Participation.

Capitalized terms not listed above are defined in Regents Policy 4405 and the corresponding Presidential Policy on Affiliations with Certain Healthcare Organizations.

### **III. Policy Text**

If UCR Health patients have any concerns or complaints about care received at a Covered Affiliate's location, they may contact UCR Health Compliance Advisory Services at (951) 827-3257 or via email to [somcompliance@medsch.ucr.edu](mailto:somcompliance@medsch.ucr.edu).

If UCR SOM employees or trainees believe their professional judgment or freedom to counsel, prescribe, refer, transfer, or provide emergency care has in any way been impeded at a Covered Affiliate's facility, they should immediately contact:

RESIDENTS AND FELLOWS: SOM Graduate Medical Education Office, via email to:  
[gme@medsch.ucr.edu](mailto:gme@medsch.ucr.edu)

STUDENTS: Confidential Grievance Reporting Line (951) 827-7826, OR via email to:  
[grievance@medsch.ucr.edu](mailto:grievance@medsch.ucr.edu)

STAFF: Chief Compliance Officer, UCR SOM at 951-827-3257 or via email to:  
[somcompliance@medsch.ucr.edu](mailto:somcompliance@medsch.ucr.edu).

FACULTY: Contact your department Chair, or the School of Medicine Compliance Officer at 951-827-3257 or via email to: [somcompliance@medsch.ucr.edu](mailto:somcompliance@medsch.ucr.edu).

If for any reason, UCR Health patients, UCR employees and contractors, or UCR trainees are unable to reach these points of contact, the following should be contacted: CEO, UCR Health at 951-827-4567. Concerns may also be reported through the University's Whistleblower Hotline at [universityofcalifornia.edu/hotline](http://universityofcalifornia.edu/hotline) or (800) 403-4744.

More information can be found in the full text of the [Presidential Policy on Affiliations with Certain Health Care Organizations](#) and the Regents Policy 4405 [Policy on Affiliations with Healthcare Organizations that Have Adopted Policy-Based Restrictions on Care](#).

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Approvals:

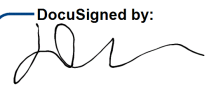
COMPLIANCE COMMITTEE (03/05/2024)

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PAUL HACKMAN, J.D., L.L.M.  
CHIEF COMPLIANCE AND PRIVACY OFFICER,  
SCHOOL OF MEDICINE

DATE

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VICE CHANCELLOR, HEALTH SCIENCES  
DEAN, SCHOOL OF MEDICINE

DATE