

INTEGRITY DEPARTMENT

# Code of Conduct



# A message from Danny Jacobs



Dear Members,

At Oregon Health & Science University, we hold ourselves to a high standard. As an organization, we follow numerous laws, regulations and professional standards. But, most importantly, we must endeavor to model best practices in education, research and patient care and to lead change.

This edition of the Code of Conduct (“Code”) includes our established core values of quality, transparency, service excellence and diversity. OHSU is committed to continuously reviewing our policies and practices to ensure they are as inclusive, effective and equitable as possible. At my request, this edition is currently under review with an anticipated update in 2020.

As a mission-based organization, we rely deeply on the public trust. How we treat one another and those that we serve holds equal importance to our accomplishments in health care, education and research. Our reputation is earned and upheld through the actions, words and deeds of our members.

We embrace a culture of inclusion and expect respectful conduct from all employees, students, volunteers and vendors. I want to be clear that discrimination, harassment, violence and sexual misconduct are not tolerated at OHSU.

Please join me in carefully reviewing this Code, adhering to its standards, and bringing the highest level of integrity to all that you do for OHSU.

Thank you.

A handwritten signature in black ink that reads "Danny Jacobs". The signature is written in a cursive, flowing style.

**Danny Jacobs, M.D., M.P.H., FACS**  
President

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# Introduction

## The OHSU Community

This Code of Conduct\* provides the guidelines and expectations for conducting business on behalf of OHSU. This Code of Conduct has been approved by the following Boards of Directors: OHSU, Doernbecher Children's Hospital, and the FPP. It has been adopted as policy and all OHSU Members are held to its standards. As with other OHSU policies, those who violate the Code of Conduct are subject to disciplinary action.

The OHSU Code of Conduct applies to all OHSU Members, defined as:

- Members of the OHSU Board of Directors
- Employees
- Students and trainees  
(e.g., interns, post-doctoral fellows on training grants, etc.)
- Volunteers
- Visiting faculty, researchers and healthcare practitioners
- Contractors and vendors, while doing business with OHSU
- Others who work for or on behalf of OHSU

## The OHSU Vision

OHSU will partner to make Oregon a national leader in health and science innovation for the purpose of improving the health and well-being of all Oregonians.

## The OHSU Mission

Oregon Health & Science University is the state's only comprehensive public academic health center. Its fundamental purpose is to improve the health and well-being of people in Oregon and beyond. A ten-member Board of Directors nominated by the Governor and confirmed by the Oregon Senate governs the University.

As part of its multifaceted public mission, OHSU strives for excellence in education, research and scholarship, clinical practice and community service. Through its dynamic interdisciplinary environment, OHSU stimulates the spirit of inquiry, initiative, and cooperation among students, faculty and staff.

Setting the example for integrity, compassion and leadership, OHSU strives to:

- 1 Educate tomorrow's health professionals, scientists, engineers and managers in top-tier programs that prepare them for a lifetime of learning, leadership and contribution.
- 2 Explore new basic, clinical and applied research frontiers in health and biomedical sciences, environmental and biomedical engineering and information services, and translate these discoveries, wherever possible, into applications in the health and commercial sectors.
- 3 Deliver excellence in healthcare, emphasizing the creation and implementation of new knowledge and cutting edge technologies.
- 4 Lead and advocate for programs that improve health for all Oregonians, and extend OHSU's education, research and healthcare missions through community service, outreach and partnerships.

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\* This Code of Conduct should not be construed as a legal document or a binding employment contract between an employee and OHSU. OHSU reserves the right to amend, modify or delete provisions contained in the Code of Conduct at any time and will notify employees of any significant changes that may affect them. All decisions regarding the application and interpretation of the Code of Conduct are under OHSU's discretion. OHSU reserves the right to deviate from this Code of Conduct when, in its discretion, it determines it is appropriate.

## **OHSU Core Values**

### **Quality**

As Oregon's only comprehensive academic health center, OHSU is and should be the standard bearer for quality. We are looked to by the community — and by extension the nation and the world — to establish the benchmarks for quality and to model behavior that adheres to those standards. Our commitment to quality extends throughout the institution. We embrace the pursuit of quality in the broadest possible sense — a commitment to excellence in our mission areas and integrity in our behavior.

### **Transparency**

Transparency is the foundation on which trust grows and develops, and as such is essential to everything we do — including collaboration, a cornerstone of OHSU strategy. Transparency builds credibility — and, over time, a sense of institutional integrity — by creating clarity around key facts in many areas from clinical outcomes to financial and other performance data. This can be uncomfortable because transparency can also reveal areas of vulnerability, but it is necessary to inspire public trust, to meet the needs of those we serve, and to fulfill our missions. There is no trust without transparency.

### **Service Excellence**

As a mission-based organization with a vision to improve the health and well-being of Oregonians, OHSU exists to serve others. To be effective, we need to be approachable and accommodating — we must offer comfort and reassurance and uphold the confidence of those we serve. This is true of internal clients, collaborators and stakeholders as well as patients, external partners, community leaders and the general public. We must always remember that the people we serve do not experience OHSU as an institution, but as a person — whether in a patient ward, on a physician consult line, through research collaboration or navigating our complex campus. OHSU's reputation is made and re-made, every day, one encounter at a time.

### **Diversity**

The first goal of Vision 2020 captures the centrality of diversity to OHSU values and strategy: "Be a great organization, diverse in people and ideas." Patients should be able to see providers who understand and can meet their diverse needs — providers who appreciate and respect differences, whether ethnic background, race, language, religion, abilities, sexual orientation or culture. Students learn best in a diverse educational environment, from mentors with varied backgrounds and experiences, and are thus better equipped to treat the increasingly diverse patient population. In the research mission, diversity promotes creativity. Innovation happens when you bring together people with a wide variety of backgrounds and ideas. Embracing diversity is the right thing to do, and the smart thing to do as well.



## OHSU Core Competencies

The OHSU Core Competencies are expected of everyone who works at OHSU, regardless of role, title or level of authority. These Core Competencies are the knowledge, skills and behaviors that create the organizational culture required for success at OHSU.

### Inclusion, Collaboration and Teamwork

**Every person matters.** We benefit from the rich variety of ideas, skills and perspectives that emerge when we work together. Our collaboration fuels innovation, better solutions to complex problems and a sense of community. Cultivating a climate of inclusion and respect enables us to partner with those who can help OHSU achieve its vision.

### Organizational Perspective

**We are all connected.** Whether our role is caring for patients, inspiring students, advancing scientific knowledge or supporting those endeavors, each person's work impacts another's. When we understand how our actions and decisions affect the whole, we can better align the needs of our workgroup with the best interests of OHSU. We have a common purpose that guides what we do and why.

### Performance Results

**We work hard to make great things happen.** We hold ourselves and our colleagues to high standards of performance that are focused on results. We pursue excellence by giving and receiving feedback openly and directly. We continually seek to improve ourselves and our work by setting goals, measuring outcomes, and developing our knowledge and skills. We exceed expectations in pursuit of our vision.

### Personal Effectiveness

**We are strong in character.** As individuals, we value integrity and inspire trust. We meet obstacles with calm resolve, and can adapt quickly to change. We continue to move forward, even when the way is unclear. Each of us aspires to be our best self, accountable for the work we do and dedicated to the purpose of OHSU.

### Clinical Enterprise Excellence \*

(FOR ALL HEALTHCARE EMPLOYEES)

**We make a difference.** Through innovation, education and clinical expertise we provide the best possible health care experience for patients and their families. Each of us understands our vital role in promoting clinical excellence, delivering value, and reducing total costs. We continuously strive to make a positive impact through our work.

Each Core Competency has associated behaviors for the organizational roles of Leading Self, Leading Others, Leading Leaders, Leading the Function and Leading the Organization.

Learn more at [o2.ohsu.edu/corecompetencies](https://o2.ohsu.edu/corecompetencies)

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\* Leaders of employees outside of Healthcare may elect this competency for their teams as appropriate.

# Meeting Our Responsibilities

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**Integrity:** To commit to and remain true to a set of values and principles through consistent actions, with unwavering dedication to being upright and honest.

## 1.1 A Culture of Ethics and Integrity

Every organization has its own unique culture. Culture is defined by the written and unwritten rules, the common ways of doing things, and the formal and informal processes that account for the way things get done. Culture is also defined by what an organization and the people who make up the organization value and prioritize.

We also know it is important that others trust us. Our patients and families, students, researchers, vendors, neighbors and other care providers in Oregon and beyond must trust that we will do what we say, honor our commitments and meet our responsibilities. In other words, we must have integrity.

In practice, this means we are committed to reviewing our own processes, and identifying strategies for progress. As a result, we are an organization committed to solving problems with careful deliberation and with methods that are mindful of the standards, requirements, our values and mission. We never lose sight of the fact that our decisions can have profound effects on the lives of others, intended or not.

This is our culture. It is defined by our action and inaction; the ways which we approach and resolve the tasks placed before us.

### Our Responsibilities

All OHSU Members are expected to meet the following responsibilities:

- Align your decisions and actions with the Code as well as with other OHSU policies and applicable laws. Pay particular attention to the policies pertaining to your work responsibilities.
- Behave in a professional, honest and ethical manner when acting on behalf of OHSU or participating in OHSU activities. This includes:
  - Abiding by the professional standards set forth by our respective professions. Maintaining all necessary qualifications and licenses related to patient care, teaching or conducting research;
  - Exercising good judgment and professional objectivity in all matters related to OHSU;
  - Treating others with respect and dignity, including our patients and families, visitors, vendors and other members of the OHSU community;
  - Being courteous, honest and respectful in our verbal and nonverbal interpersonal behavior;
  - Value and respect difference, individuality and diversity of thought; and
  - Holding yourself accountable and encouraging others to speak up, contribute and fully utilize talents.
- Create an environment where others feel comfortable asking questions, addressing issues and raising concerns.
- Do not abuse the power and authority you might have based on title, position or other delegated authority.
- Foster an environment of improvement by taking prompt action to honestly report deficiencies and errors, even those that may seem small or insignificant, to the appropriate individual in your area.
- Resolve any differences that might impact safety, quality or performance in a respectful manner through open and honest discussions. When you are not able to resolve differences directly with team members, seek additional resources to help resolve the issue.
- Promptly report concerns about possible violations of laws, regulations,



OHSU policies and this Code as noted below, without fear of retaliation, especially from those in positions of power and influence.

- Complete all required training in a timely manner and apply what you have learned in your work every day.
- Cooperate, tell the whole truth and provide all information when responding to a review, investigation or audit.
- Manage partnerships with third parties such that they align and abide with this Code.
- Refrain from unacceptable and disruptive behaviors, including but not limited to:
  - Shouting or yelling;
  - Using profanity;
  - Physically demonstrative or threatening behavior, including slamming or throwing objects in anger;
  - Engaging in hostile or demeaning communication or actions;
  - Criticizing others' performance or competency in a public or an inappropriate manner not aimed at performance improvement; or
  - Being unfit for duty for any reason, including impairment from alcohol or other substances.

## **1.2 Accountability Under the Code of Conduct**

The *Code* details the fundamental principles and framework for action within our organization. It states our expectations and responsibilities, which support our culture of acting with integrity. We value the prevention, detection and resolution of ethical and integrity issues.

## **1.3 Making the Right Choice**

Making the right decision is not always easy. There will be times when you will be under pressure or unsure of what to do. Always remember when you have a tough choice to make that you are not alone. Your colleagues and the resources cited throughout this Code are available to help.

**When faced with a difficult decision it may help you to stop and ask yourself these questions:**

- *What action(s) or outcomes are most aligned with safety, quality and our OHSU Core Values?*
- *Is it the right thing to do?*
- *Do I know the policies, regulations, procedures and standards that are applicable and can help me to make the right decision?*
- *Have I considered all the options?*
- *Can I honestly say I would be proud of the choice I made if it were subsequently made public or others were made aware?*
- *What is the possible impact of my actions on others?*

#### 1.4 Managing Conflict Constructively

Collaboration, mutual respect and clear communication are necessary parts of performance excellence — as individuals, teams and as an organization. In addition, OHSU is diverse in people and perspectives, making for a rich and dynamic environment. But, when different perspectives become incompatible, it may lead to conflict, a normal and inevitable part of any workplace. Conflict can have constructive and/or destructive impacts, affected in large part by how each person approaches the matter and one another. Conflict management involves open, productive and respectful communication that acknowledges the rights and responsibilities of involved parties. An open exchange of diverse information and perspectives enhances effective decision making, particularly in challenging or complex situations. OHSU Members should seek to resolve issues as soon as possible in order to protect performance excellence, even in the most challenging situations. Consider these questions when facing a difficult interpersonal situation:

- *Who and what will be impacted if this situation continues to go unresolved?*
- *What can I do to respectfully address the matter directly with the person(s) involved?*
- *What are my options for managing a difficult work relationship that is ongoing?*
- *Have I considered support resources, such as the Conflict Coaching Service, to help me talk directly with the other individual(s) involved as my first course of action?*

OHSU strives for performance excellence in all of our domains — safety, quality, and service. Inter-professional collaboration, mutual respect, clear communication and teamwork are necessary to achieve performance excellence. However, situations may arise when team members cannot agree on the plan and additional resources are necessary to facilitate a collaborative resolution that assures a satisfactory solution for each team member.

Human factors science tells us that even skilled and experienced individuals can make mistakes. The limitations of human memory and our capacity to multitask make us vulnerable to the effects of stress, fatigue, distractions and interruptions. Therefore, all members are responsible to assure effective communication that creates a well understood plan that reduces the chances of inevitable errors becoming consequential and injuring others or OHSU.

#### **Issues that call for open, clear, and direct communication include:**

- Behaviors or practice variations that pose a threat to the safety of OHSU Members, patients, visitors, family, etc.
- Unresolved environmental, equipment or system issues that pose a risk.

#### **The following are the steps that OHSU Members are encouraged to take for self-resolution of integrity concerns:**

- Colleague to Colleague
  - Work directly with the colleague(s) involved in the situation to come to a solution.
- Lead, Supervisor, Manager (etc.)
  - If unable to come to a mutually agreed upon solution, seek assistance from your supervisor or manager. Either with your colleague(s) or alone.
- Department Head, Division Director

- Contact appropriate department:
  - Integrity Department or Hotline, AAEO, or Human Resources.

### Our Responsibilities

Optimize integrity with open, respectful and collegial communication directly between OHSU Members, especially during times of disagreement.

Utilize direct, respectful escalation of concerns between OHSU Members by asking questions, requesting clarifications or corrections, expressing concerns and involving others in the resolution as described above.

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### OHSU Integrity Hotline

1 877 733-8313

[www.ohsu.edu/hotline](http://www.ohsu.edu/hotline)

24 HOURS A DAY

7 DAYS A WEEK

### 1.5 Asking Questions and Reporting Concerns

OHSU has the opportunity to improve every time you ask a question or raise a concern. When you speak up to clarify a policy or report questionable conduct, you are protecting your colleagues, the interests of patients, caregivers and students and the reputation of OHSU. **Remember, an issue cannot be addressed unless it is brought to the right person's attention.**

- If you have a concern about a decision, behavior or action as a possible safety risk (e.g. workarounds, breaks in team communication, non-standard practices), you are responsible for speaking up immediately, not after the fact.
- When addressing an issue, if appropriate and you are comfortable doing so, it is generally best to talk directly to the individual(s) involved.
- If you are not comfortable talking directly to the individual(s) involved, discuss the concern with your supervisor or manager. **If at all possible, consider directly approaching the other individual(s) involved as your first course of action.**
- If you are uncomfortable discussing certain questions or concerns with your supervisor or manager, or if you have already done so and the situation remains unresolved, you are encouraged to discuss the issue with someone at a higher level of authority such as a department head/ chair or area lead.
- You also may discuss the concern with an OHSU Integrity Officer or a representative from the Human Resources, Legal, Affirmative Action and Equal Opportunity and/or Public Safety department(s).
- If you do not feel comfortable with any of these steps, you may call the OHSU Integrity Hotline or one of the Integrity Department staff to discuss your concern. These calls are not recorded.
- For those in a management position:
  - Create a safe space by being open to understanding the issue and seek to understand what and why the individual is concerned.
  - Follow up on the concern, taking action as appropriate, such as providing information or referral to another resource for further review.

### What to Expect When You Use the Integrity Hotline

OHSU contracts with an outside company to provide an Integrity Hotline for the OHSU community. The Hotline provides a confidential and anonymous way to ask questions or report concerns. You may report concerns online or via a toll-free phone number.

If you use the hotline to report a concern, you will be given a tracking number. This will enable you to provide additional information that can then be linked to your original report.

### Retaliation is Prohibited

Regardless of the type of misconduct reported or the method of reporting, OHSU will not tolerate retaliation against anyone who makes a good faith report of an alleged violation of the law, this Code or OHSU's policies and procedures.

**Retaliation:** Occurs when someone takes an adverse action against an individual as a result of bringing forward a concern or participating in an investigation or review of a reported concern.

We view reporting as a positive action, and we take allegations of retaliation seriously. If you believe you have been retaliated against, you should report such action using any of the resources listed in this Code.





## Our Responsibilities to One Another and for Those in Our Care

### 2.1 Keeping Safe and Healthy

Nothing is more important to us than ensuring the safety of our patients and all members of the OHSU community. We must always be careful to use sound and safe procedures and to always look out for the safety of others. We must be alert to health and safety risks as we go about our jobs and speak up whenever we see a potential hazard. We care about the health and safety of members of the OHSU community, OHSU's physical environment and the environmental impact of our activities on the broader community.

#### Our Responsibilities

- Do not use threats, intimidation or violence. These actions undermine everything we stand for as an organization and will not be tolerated.
- Do not possess any firearm on OHSU property unless covered by an exemption in OHSU Policy 07-30-010.
- Do not possess any weapon on OHSU property that creates a security concern or is disruptive to OHSU operations or the OHSU work, learning or health care environment.
- Help contractors and third parties to act consistently with our safety requirements.
- Promote a healthy environment by following our Tobacco Free Policy.
- Ensure that OHSU buildings, laboratory spaces, chemicals, drugs, equipment and products are used safely and in accordance with all applicable policies and laws.
- Take the necessary steps and precautions to safely perform your duties and protect other OHSU Members, patients, visitors and the public.

### 2.2 Diversity, Inclusion and Equal Opportunity

Diversity at OHSU means creating a community of inclusion. We honor, respect, embrace and value the unique contributions and perspectives of all OHSU Members including but not limited to, employees, patients, students, volunteers and our local and global communities. We value the unique contribution each person brings to the OHSU community. We accomplish more together as a team when we include people with diverse backgrounds, talents and contributions.

Diversity is fundamental to OHSU's ability to attract and retain top talent, achieve innovation and creativity, flourish in a competitive market, maximize the return on our investment in people, and ensure flexibility to thrive. Diversity is essential to realize our multifaceted mission and to set the example for integrity, compassion and leadership in healthcare, education, research and community service.

OHSU also complies with Title IX of the Education Amendments of 1972 and the Campus Sexual Violence Act (Campus SaVE Act) by prohibiting sex and gender discrimination in education programs, activities, employment and admissions. Such discrimination includes (but is not limited to) discrimination and harassment on the basis of gender, gender identity, gender expression or sex, sexual harassment, sexual misconduct, sexual violence and retaliation for reporting such concerns. OHSU also prohibits dating violence, domestic violence, sexual assault and stalking.

#### Our Responsibilities

- Respect and value all who we serve.
- Be open and non-judgmental to new ideas and varied perspectives.

- Help create an environment in which we can openly discuss diversity.
- Understand our individual responsibility to meet equal opportunity laws.
- Ensure that any materials being distributed or displayed are respectful and inclusive (messaging, photos, translation, etc.) rather than discriminatory or offensive.
- If you supervise others, evaluate them solely on their work performance. Assign work and make employment-related decisions solely on the basis of qualifications, past work performance and potential. Avoid introducing non-job-related considerations into your decisions. Use objective and quantifiable standards.

### 2.3 Harassment and Bullying

People work best when they feel safe and respected. We do not tolerate harassment or bullying. This includes any conduct, whether electronic, physical, nonverbal, verbal, visual or other conduct, that disrupts another's work performance or creates an intimidating, offensive, abusive or hostile work environment.

**Harassment:** Any conduct that is connected in a negative way with an individual's or a group's age, color, disability, gender, gender identity or expression, marital status, military status, national origin, race, religion, sex, sexual orientation, participating in a Civil Rights complaint, use of the federal Family and Medical Leave Act or Oregon Family Leave Act, use of the workers' compensation system or any other status protected by law when:

- A Submission to or rejection of such conduct is used either explicitly or implicitly as a basis for any decision affecting terms or conditions of an individual's employment, receipt of services or academic activities; or
- B Such conduct has the effect of unreasonably interfering with an individual's work performance, receipt of services or academic activities or creates an intimidating, hostile or offensive environment.

**Bullying:** Any behavior that is repeated, systematic and directed towards an individual or group of individuals which a reasonable person would expect to victimize, humiliate, undermine or threaten that individual or group and which creates a risk to health and safety. Intimidation is a form of bullying where someone acts aggressively in a manner that causes someone else to reasonably fear physical harm.

#### Our Responsibilities

- Hold ourselves and others accountable to identify and address all forms of harassment or bullying.
- Remember that harassment and bullying violate our values and may violate the law, even when they involve individuals outside the OHSU community or occur outside the workplace.
- Do not engage in degrading jokes, slurs, bigotry, physical or verbal intimidation, unwelcome sexual advances or other disrespectful conduct when interacting with others. Understand that offensive messages, derogatory remarks, symbols, and inappropriate jokes can all be forms of harassment, may result in disciplinary action up to and including termination, and are inconsistent with our culture and beliefs.
- Speak up, be direct and tell a person if you are upset by his or her actions or inappropriate language. If possible, explain why and ask him or her to stop. Make a formal complaint if the behavior continues, if you are uncomfortable taking a direct approach, or when such resolution is not possible or appropriate.

- If someone says you are offending him or her with your words or actions, you should stop at once, even if you believe you are acting innocently or inoffensively.

## 2.4 Patient Care

We are committed to providing compassionate, appropriate, high-quality, cost-effective care in a manner that is sensitive to our patients' and families' individuality, personal beliefs and culture. We are also committed to providing considerate and respectful care, including consideration of cultural, spiritual and personal variables that influence the perceptions of illness. We also subscribe to the Patient's Bill of Rights that guides us in providing culturally sensitive care and work to deliver this care in a setting that is free from abuse, discrimination or harassment.

We work to promote an atmosphere that strongly supports excellent care and to document that care accurately and thoroughly.

### Our Responsibilities

- Consistently treat patients and families with respect and dignity.
- Be responsive to individual, family and community health care needs, making reasonable efforts to accommodate their preferences and honor their rights, culture, belief systems and language of preference.
- Consistently maintain a safe patient care environment that is free from verbal, sexual, physical, mental abuse and/or other barriers that might prevent receiving the best care.
- Help patients and families to secure their property.
- Never solicit or accept offers of gifts, tips or loans from patients or their family members regardless of the amount or of your intent to repay.
- Providers should not provide treatment to themselves or members of their immediate family, except in emergencies.

## 2.5 OHSU Culture of Safety Position Statement

Decreasing patient harm by reducing preventable medical errors is a primary healthcare provider obligation. To reduce preventable medical errors, the Institute of Medicine and other regulatory agencies have urged healthcare organizations to create a "culture of safety" in which safety is the core value and highly reliable systems of care are the core strategy.

Creating a culture of safety requires that we constantly learn how and why we make errors and that we dedicate ourselves to continuously improving the systems in place to prevent errors. It means that we are committed to achieving a "culture of safety" at OHSU by addressing all aspects of that culture, including creating an environment in which it is easy and desirable for anyone to report an error.

There are four components to a culture of safety at OHSU, we embrace the following:

**Just Culture:** We recognize that most mistakes come from system failures. We are committed to a non-punitive and transparent response to error reporting. We maintain individual accountability for actions in a manner that reflects overall patterns of behavior and performance.

**Reporting Culture:** We continuously dedicate ourselves to promoting open reporting of errors. We commit to a response that is objective, timely and reliable.

**Learning Culture:** We develop highly reliable systems and teams by engaging in process improvement efforts, using internal and external sources to guide our learning and being transparent with OHSU Members, patients and families.

**Engaged and Informed Culture:** We are mindful and respectful of the ideas and perspectives of all OHSU employees. We honor the courage of those who raise concerns and foster the development of trusting relationships that enhance our community.

#### Our Responsibilities

- Hold ourselves individually accountable.
- Recognize that most mistakes come from system failures, not human failures.
- Respond to system errors in a non-punitive, transparent and consistent way.
- Raise concerns face-to-face with team members in a respectful manner.
- Develop and cultivate highly reliable systems and teams.
- Fulfill our obligation to safety by reporting patient safety risks immediately.
- Respond to events consistently, reliably and in a timely manner.
- Learn from our mistakes and rectify problems and inconsistencies.
- Be honest and transparent with OHSU Members, patients and families about safety.





## 3.1 Our Teaching and Learning Philosophy

OHSU provides educational opportunities for current and future health care professionals, scientists, engineers, managers and educators.

As educators, we place a high value on intellectual curiosity, academic freedom, integrity and outstanding professional preparation. We understand the importance of maintaining a collegial environment in which faculty, staff and students are valued and respected. We accept the responsibility to impart knowledge that is accurate and thorough, and to do so in a stimulating manner and environment that will help our students and colleagues engage in continual inquiry and lifelong learning.

### Our Responsibilities

Those of us who teach recognize the responsibilities we have to:

- Foster our students' professional growth and ethical behavior.
- Consistently treat students with respect, protect our students' privacy and ensure a safe and equitable learning environment, free from discrimination, harassment and retaliation, where students can express opinions and ask questions.
- Hold ourselves and others accountable to upholding our responsibilities for scholarship, professionalism and mutual respect.
- Carefully weigh the credentials of each candidate for graduation, ensuring that only those who have exhibited the appropriate level of expertise, who meet expected competencies and demonstrate that they are deserving of the public's trust are allowed to graduate.
- Those of us who are students recognize the responsibilities we have to:
- Honor the learning environment through active participation.
- Respect our instructors, mentors, administrators, fellow students and other OHSU Members.
- Honestly represent our skills, abilities and the work we have done individually and collaboratively.
- Embrace the ethical expectations associated with our future professions.
- Demonstrate a level of competence consistent with the responsibilities we have chosen to assume.

## 3.2 Academic and Research Standards

The reputation of OHSU's research is critical to the organization's mission. Protecting the high quality of this reputation requires that we also maintain and protect our academic and research integrity.

We are committed to the well-being of our research participants and their families, and we create and maintain an environment that fosters privacy, security and comfort.

OHSU does not tolerate acts of plagiarism, falsification or fabrication of data.

### Our Responsibilities

- Respect all research participants — human and animal.
- Engage all human research participants or their appropriate representatives in a meaningful informed consent process.
- Protect human research participants, laboratory personnel, laboratory animals and scientific integrity by following processes of institutional review and approval for any research and disclosure of financial interests.

- Adhere to approved protocols and obtain prospective approval of any changes in those protocols as required by OHSU policies.
- Ensure that reporting of research is accurate, complete and unbiased.
- Comply with all requirements and stated terms and conditions of grant awards and contracts.
- Properly record and charge all costs to appropriate accounts.

#### **Intellectual Property**

As a health and research institution, OHSU is committed to collegial exchange, sharing ideas, research findings and the products of intellectual pursuit with the broader academic community. This sharing advances our search for scientific knowledge, the development of successful practices and results in benefits to the people and communities we ultimately serve.

Whenever research results have the potential for commercial applicability, OHSU makes every effort to ensure that the technology is developed through appropriate relationships with industry. In such cases, we take steps to recognize OHSU's ownership interest and to protect its ownership rights to intellectual property.

#### **Technology Transfers**

Faculty and students are reminded that federal export rules may restrict the transfer of technology and technical data to some foreign countries or their citizens. Transfers can occur through postings on the internet, emails and even conversations, meetings and database access. If you have any questions, contact the Office of International Affairs' Export Controls Program



# 4

## Protecting Information and Assets

### 4.1 Privacy and Security of OHSU Restricted Information

One of our most valuable assets is information. At OHSU, there are several different types of information that we work with: Public, Confidential, Proprietary and Classified. Public information is information that is intended for public use and disclosure whereas OHSU Restricted Information — which includes Confidential, Proprietary and Classified information — must be secure and kept confidential. This means it must be accessed, stored and transmitted in a manner consistent with our policies and procedures.

#### OHSU Restricted Information

**Classified:** OHSU information that has significant security implications if improperly used or disclosed. Classified information misuse or disclosure may affect national security, law enforcement activities or public health and safety. Information provided to OHSU under extremely restrictive access requirements will generally be considered “classified.” Examples of classified information are Department of Defense contracts for research.

**Confidential:** OHSU information for which disclosure to unauthorized individuals would violate OHSU policy or applicable regulations or may pose a security risk. Examples of such information are Protected Health Information (PHI), student records, employee records, other individually identifiable information and some types of research information.

**Proprietary:** OHSU information that is not intended for public review or access or carries risk to the organization if used or disclosed inappropriately. Examples might be financial statements, individual practice business plans, some types of research information or strategic planning documents that may impact competitive advantage in the market place.

#### Our Responsibilities

- Follow all OHSU policies pertaining to confidentiality and acceptable use of computing and telecommunications (Policy No. 11-20-010) resources.
- Be attentive and safeguard all OHSU Restricted Information including research results as well as patients’ and families’ confidential information that is entrusted to us.
- Only access, use or disclose OHSU information for legitimate business purposes, as required to fulfill your OHSU responsibilities, or as allowed or required by law and OHSU policy or procedures.
- Do not share, sell or post OHSU Restricted Information (including but not limited to, research projects, student information or patients’ and families’ information) outside of OHSU unless approved. This includes posting information to personal social media, email or “cloud” storage accounts.
- When accessing, maintaining, sharing, storing or transmitting electronic data (including but not limited to records, manuals, computer files, databases, generated reports):
  - Use only encrypted OHSU-owned or -approved systems and storage devices;
  - Use only OHSU.edu or other OHSU approved email systems; and
  - Type “secure” as the first word in the email subject line when sending OHSU Restricted Information outside of OHSU to ensure encryption.
- Avoid discussion of OHSU Restricted Information in public areas including but not limited to:
  - Public transportation, the Tram, cafeterias and restaurants, gift shops, when using mobile phones or outside OHSU property.

- Ensure the physical safety and protection of restricted information:
  - Verify fax numbers before transmission. We must be careful not to send OHSU Restricted Information to unattended fax machines or printers.
  - Verify mailed documents are placed into the correct envelopes. Be certain the correct documents are being given to the correct person.
  - Secure bags, backpacks, laptops and other portable devices containing OHSU Restricted Information. Do not leave them unattended and in plain sight in public spaces, including vehicles, offices or homes.
- Report any unauthorized use or disclosure of OHSU Restricted Information to your supervisor or to the Integrity Department.
- The obligation to preserve the confidentiality of OHSU's information is ongoing, even after employment ends.

### Personal Information

In recent years, individuals, organizations and governments have grown increasingly aware of issues relating to the privacy and security of personal information. As a result, laws protecting the privacy of personal information and how it may be collected, shared and used are becoming more common. We have a legal and ethical responsibility to protect the private and confidential information of our employees, students, volunteers, research subjects, patients and families and other members of the OHSU community.

### Our Responsibilities

- Accept responsibility and be accountable for protecting personal information and for handling it securely.
- Collect personal information only for legitimate purposes, and keep it only as long as necessary.
- Take precautions to safeguard personal information when collecting, processing, storing and transferring it.
- Ensure that any third parties that legitimately receive information from us (in order to provide OHSU service) understand the importance we place on maintaining the privacy of personal information and agree to uphold our standards.
- Keep student records confidential, as is required by the Family Educational Rights and Privacy Act (FERPA).
- Keep patient health information confidential, as is required by state and federal privacy laws including the Health Insurance Portability and Accountability Act (HIPAA); ensure that the original copies of medical records remain in the facility unless authorized (a patient or the patient's legally authorized representative may request a copy of his or her own medical records orally or in writing).

## 4.2 Creating and Maintaining Records

The public, government authorities and others need to be able to rely on the accuracy and completeness of our records. Accurate and accessible information is also essential within OHSU so that we can make good decisions.

OHSU is committed to transparency and to making full, accurate, timely and understandable disclosure on all aspects of our operations. This includes clinical documentation, billing, cost reports, payroll records, student information, contracts, expense reports, receipts and financial reports that are submitted to regulatory authorities.



All of us contribute to the process of recording employee, student or patient information, research results, or maintaining business documents, but OHSU Members with a role in the preparation of our public, financial and regulatory disclosures have a special responsibility in this area. In various ways, all of us contribute to the process of recording student or patient information, research results or maintaining business documents.

#### **Our Responsibilities**

- Ensure the information we record is accurate, complete and maintained in a manner that is consistent with our system of internal controls.
- Confirm that those who report to you, including students, understand and comply with their responsibilities for maintaining accurate and complete records.
- Always be accurate, complete and truthful when creating any OHSU record or submitting academic, clinical or financial documentation.
- Ensure that financial entries are clear, complete and fully disclose any transaction.
- Be as clear, concise, truthful and accurate as possible when recording any information. Avoid exaggeration, colorful language, guesswork, legal conclusions and derogatory characterizations of people and their motives.

#### **Records Management**

OHSU has records management policies and procedures to ensure that our records are maintained, stored and destroyed when appropriate, in accordance with our business needs and in compliance with applicable regulations.

Each of us is responsible for information and records under our control. We must be familiar with the recordkeeping procedures that apply to our jobs. We are accountable for the accuracy and truthfulness of the records we produce and it is also our responsibility to keep our records organized so they can be located and retrieved when needed.

Documents containing sensitive and/or OHSU Restricted Information shall be kept in their designated storage locations when not in use. Sensitive information must be disposed of properly. The information should be shredded or deposited in a designated location for removal and destruction.

Documents shall only be destroyed in accordance with Policy No. 07-90-010, Records Retention and Destruction, and never in response to or in anticipation of an investigation, audit, claim, lawsuit or arbitration proceeding.

#### **4.3 Protecting Our Assets**

We all have a responsibility to use OHSU's resources and physical property judiciously, and to ensure that they are not misused, damaged, lost, stolen or wasted.

OHSU's property includes our facilities, furnishings, vehicles, equipment, computers, software, supplies, cash, reports, records, electronic files, websites and data as well as our patents, trademarks, intellectual property and Restricted Information.

### **Our Responsibilities**

- Report any suspicions you may have concerning theft, embezzlement or misappropriation of any OHSU property.
- Handle documents containing sensitive information carefully during all hours and secure them properly at all times. This includes information stored on computer systems as well as physical paper.
- Look for the following red flags that may indicate inappropriate use of our resources and possible fraud or theft:
  - OHSU property that is not secured when not in use;
  - OHSU Members allowing others to borrow or use equipment without approval;
  - Sharing of individual passwords or login information;
  - Unknown individuals without proper credentials in our facilities;
  - Excessive use of resources for personal purposes; or
  - Lax enforcement of electronic access control cards.

#### **4.4 Proper Use of OHSU's Computer and Telecommunications Resources**

OHSU provides various computer and telecommunication resources including phones, personal computers, networks and related software and hardware to assist in performing our duties for OHSU.

### **Our Responsibilities**

- Ensure that incidental personal use of computers and telecommunication resources does not interfere with our jobs or violate any of our policies or values.
- Do not use OHSU equipment and resources for personal-commercial purposes.
- Be responsible for the physical security of OHSU-issued computer and telecommunications resources.
- Understand OHSU-supplied equipment is the property of OHSU; as such, there should be no expectation of privacy.
- Comply with OHSU standards of respect and integrity and ensure OHSU-supplied equipment is kept free of discriminatory or offensive language.

#### **4.5 Communicating with the Public**

We need a clear and consistent voice when providing information to the public and the media. As such, OHSU's Strategic Communications office is responsible for coordinating all public contacts and messages.

OHSU complies with the Oregon Code of Cooperation published by the Oregon Association of Hospitals and Health Systems to facilitate accurate, ethical and timely news coverage of medical and other health-related events. The Code of Cooperation balances the patient's right to privacy and well-being with the public's right to receive information.

### **Our Responsibilities**

- Only speak on behalf of OHSU if authorized to do so.
- Promptly direct all media inquiries, including those regarding OHSU's activities, plans or its position on public issues, to Strategic Communications.
- Share the activities and accomplishments of the OHSU community with Strategic Communications so that the OHSU community and the public are apprised of OHSU's successes.

- Ensure that the information provided to Strategic Communications and representatives of the media is accurate and that your role and OHSU's role is honestly portrayed.
- Adhere to OHSU's visual identity guidelines to enhance our common mission and seek help when needed.

#### **4.6 Outreach and Volunteerism**

OHSU maintains close working relationships with its neighbors as well as the community at large. The organization encourages OHSU Members to share their knowledge and expertise with others through interactions in their neighborhoods and throughout the state. You are welcome to inform Strategic Communications about volunteer and community outreach activities that may be of interest to other members, or that may present an opportunity for OHSU to provide official support.

#### **Our Responsibilities**

- Seek guidance and assistance from Strategic Communications before representing OHSU in, or committing OHSU to, volunteer activities.

#### **4.7 Using Social Media**

At OHSU, we understand that social media is a remarkable way to share information, opinions and more with family, friends and co-workers around the world. However, the use of social media also presents risks and carries with it certain responsibilities.

Ultimately, you are solely responsible for what you post online. Before creating online content, consider some of the risks that are involved. Keep in mind that any of your conduct that adversely affects your work or school performance, or otherwise adversely affects others or OHSU's legitimate business interests, may result in disciplinary action up to and including termination.

#### **When using social media in connection with OHSU:**

- Obtain approval from OHSU's Social Media Manager before creating any OHSU social media channels. Remember to maintain institutional and patient privacy guidelines. Violation of these policies could result in a temporarily or permanently closed account. For more information, please visit the guidelines for social media.
- Use OHSU logos, trademarks or copyrighted materials only when specifically authorized to do so.
- Understand that inappropriate postings that may include discriminatory remarks, harassment, intimidation, threats of violence, or similar inappropriate or unlawful conduct will not be tolerated and may subject you to disciplinary action up to and including termination.
- Take care to post truthful, accurate information. Avoid posting rumors or anything you know to be false. If you make a mistake, correct it quickly. Be open about any previous posts you have altered. Remember that the internet archives almost everything; therefore, even deleted postings may be retrievable.
- Ensure that your communications online related to the work you do or topics associated with OHSU or its competitors, make it clear that you are not speaking on behalf of OHSU. Identify yourself as an individual in the community, not as a spokesperson for OHSU. Consider adding a disclaimer to your personal accounts, e.g. *"Opinions are my own and not those of OHSU."*



- Maintain the confidentiality of OHSU intellectual property and private information. Do not publicly post or share information posted on the intranet. Trade secrets may include information regarding the development of systems, processes, products, know-how and technology. Do not post internal business related confidential communications, which may include, but are not limited to, internal reports, policies and procedures.
- Be mindful of privacy settings, and take care to learn who has access to your online postings. Remember to review these settings regularly.



## Working with Our External Business Partners

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### Vendor Diversity

We recognize the importance and benefits of a diverse vendor base.

We will help support our local community and work to maintain a strong vendor base that reflects the diversity of the overall vendor community, including but not limited to minority- and women-owned businesses.

### 5.1 Vendor Relations

Our vendors and external business partners make significant contributions to our success. To create an environment where our vendors have an incentive to continue to work productively with OHSU, they must be confident that they will be treated fairly and in an ethical manner.

Our policy is to purchase supplies and select vendors based on need, quality, service, price and terms and conditions. We select significant vendors and contractors through the appropriate and transparent procurement process, including informal and formal bidding processes. We believe in doing business with those who share our commitment to high standards of ethical business conduct. OHSU does not fix prices, divide geographic markets or make any agreement that may artificially raise the prices of OHSU services or otherwise impede competition.

We must be sure to perform due diligence and know our vendors and all those through whom we conduct our business. We must know whom they are, what they do and what they are doing on our behalf; and they must understand that they are required to operate in compliance with our standards and to maintain accurate and complete records.

### Our Responsibilities

- Respect and protect the confidential and proprietary information of vendors.
- Only certain OHSU Members have the authority to obligate OHSU under contracts. Contact one of OHSU's contracting departments, including but not limited to Logistics, Legal or Tech Transfer, to ensure proper contract language and signatory authority for all contracting as early as possible in the negotiation process.
- Fairly and accurately represent OHSU's services and responsibilities to the public and with our vendors.
- Observe fair business practices that accurately reflect OHSU's skills and accreditations.
- Select services on the basis of quality, effectiveness, economy and appropriateness, and design them to meet identified needs while also seeking to avoid unnecessary expense.
- Employ fair business practices in negotiating contracts and making purchases prior to execution or purchase.
- Do not give or accept any bribes, kickbacks or other improper payments. Federal and state laws specifically make it a crime for anyone to offer or accept a bribe, kickback or anything of value for referring patients or other business.
- If you are in a leadership position at OHSU:
  - Work with our vendors and other external business partners to ensure that they understand our standards for high performance in ethics and compliance.
  - Watch out for any signs that our vendors are violating applicable laws or regulations. Insist on honest accounting of time, materials and acceptance of prompt deliverables on time to meet our standards.
  - Disclose any situation that may appear to involve a conflict of interest (see below).



## 5.2 Conflicts of Interest

A conflict of interest happens whenever you have an interest that competes with your ability to make an objective decision in your OHSU role. For example, if you are involved in a situation or transaction that might create the appearance that you are promoting the interest of someone other than OHSU, whether for your personal gain or for the gain of friends, relatives or vendors, then you may have a conflict of interest.

### Our Responsibilities

- Avoid conflicts of interest whenever possible.
- Consistently make decisions in the best interest of OHSU.
- Discuss with your supervisor or the Integrity Department full details of any situation that could be perceived as a potential conflict of interest.
- Proactively address situations that may put your interests, or those of a relative or others, in potential conflict with OHSU.
- Reassess your situation from time to time to look for new potential conflicts as individual and OHSU circumstances change, discussing any concerns with your supervisor or the Integrity Department.

It is impossible to describe every potential conflict, but the following are some examples:

### Business Opportunities

As a condition of employment or service to OHSU, all OHSU Members have assigned to OHSU all right, title and interest to intellectual property created or developed in whole or in part on any OHSU time or through the use of OHSU equipment, supplies, facilities or Restricted Information. All OHSU Members and their agents should work with OHSU's Office of Technology Transfer and Business Development (TTBD) prior to discussing or engaging with any outside party in relation to any intellectual property.

### Outside Activities

Outside activities such as consulting, board membership or outside employment can create a conflict of interest in several different ways. For example, outside work may interfere with your ability to fulfill your OHSU responsibilities.

There may be a risk that the outside activity leads to a disclosure of Restricted Information, the activity could adversely affect OHSU's reputation, or you might be in a position to inappropriately gain financially from knowledge learned at OHSU.

Because of the potential for conflicts, permission to provide services to others similar to those you provide for OHSU should be obtained from your supervisor by disclosing in the online Conflict of Interest disclosure system.

### Significant Financial Interests

When OHSU Members have a significant financial interest in an entity that does business with, seeks to do business with or is in competition with OHSU, and they have the potential to influence OHSU decisions with that entity, this is a potential conflict of interest. This must be disclosed to their supervisor so that a management plan can be developed, which generally will be to recuse that member from decision making that impacts the business.

## Family Members

Without the approval of Human Resources and your supervisor, you, as an OHSU Member, are not allowed to hire or place relatives in positions that create a conflict of interest per Policy No. 03-05-040, Employment of Family Members. Conflicts of interest are created when:

- You have direct supervisory authority over a relative;
- You may significantly influence the pay, benefits, career progression or performance of a relative; or
- You are in a position of authority to enter into a business agreement/contract with any relatives.

## 5.3 Gifts and Entertainment

As an organization, we rely on major gifts and donations to provide critical support to our mission and growth. Such gifts, however, are accepted on behalf of the organization and in accordance with relevant laws and regulations.

While OHSU is grateful for the gifts the organization receives, OHSU must diligently avoid any real or perceived conflict of interest or the perception of unfair advantage. This is particularly important when gifts are solicited or received from OHSU vendors. In order to avoid the appearance of a conflict of interest, there should be an arm's length relationship between the vendor selection process and fundraising efforts.

The exchange of individual gifts and entertainment is however a very different matter. While gifts and entertainment may be usual and customary in other businesses, as an academic medical center, more stringent laws and policies apply. Situations involving gifts can be complicated, but for us one principle is always clear: We do not offer, solicit or accept gifts or entertainment that may appear to or actually influence OHSU decisions.

## Our Responsibilities

- Only give or accept gifts if ALL of the following conditions are met:
  - The gift cannot be reasonably construed as payment or consideration for influence or reward for a decision or action;
  - It does not violate applicable law (it meets one of the specific exceptions noted in the Conflict of Interest policy); and
  - If the nature of the transaction or gift was disclosed to the public, it would not embarrass you or the OHSU community.

## Our Responsibilities to the Letter and Spirit of the Law

### 6.1 Communicating and Cooperating with Regulators and Investigations

OHSU will cooperate with every reasonable request of federal, state and local authorities seeking information concerning our operations. At the same time, we are entitled to the safeguards provided by law, including the representation of legal counsel from the first contact. For example, we may be asked for patient information that is protected by privacy laws and may be obliged to ensure privacy in responding to such requests.

#### Our Responsibilities

- Respond to inquiries from regulators or government authorities that you may receive during the course of your work by stating that OHSU intends to cooperate but that the matter must first be discussed with the OHSU Legal Department. During normal work hours, attorneys in the OHSU Legal Department are available at 503 494-5222. Outside of normal work hours, call the OHSU switchboard at 503 494-8311, stating that government investigators are present and requesting information, and ask the operator to contact an OHSU attorney.
- Take prompt action to preserve documents that may be relevant when we are notified of an external investigation or lawsuit. The appropriate OHSU Member or department will notify you if any actions are required of you to assist in this effort.
- Keep informed about new requirements that may affect your area. However, laws and regulations may be complicated and difficult to understand. If you have any questions, be sure to discuss them with your supervisor.

#### Government Contracting

OHSU conducts business with governments and government-owned entities. Our policy is to comply fully with all applicable laws and regulations that apply to government contracting and transactions.

Leaders who oversee work with governments and government-owned entities must remain up-to-date on relevant regulations and OHSU requirements. Special care is taken to ensure that any third party, while acting on behalf of OHSU, who provides goods or services on government projects, know that they are required to operate in compliance with our standards, their contractual obligations and to maintain accurate and complete records.

#### Gifts and Entertainment of Government Representatives

Extra care needs to be taken when dealing with government officials. Federal and state lobbying and ethics laws regulate contacts with government officials and their staffs.

No gifts or other benefits, including entertainment, may be offered to government officials if they could be considered as influencing any business decision or to obtain improper advantage.

Any request made to a member of the OHSU community by a government official for an improper payment, or any action taken or threatened by such a government official with the intent of obtaining an improper payment or benefit, must be reported immediately to the Integrity Hotline.

## Kickbacks and Inducements

The Federal Anti-kickback Statute and various similar state laws prohibit giving, getting, offering or asking for anything of value in return for business referrals. You must examine all relationships and arrangements with referral sources, physicians and vendors to be certain there are no kickbacks or illegal inducements for the referral of patients or use of products.

## 6.2 Anti-Corruption and Bribery

The U.S. Foreign Corrupt Practices Act (FCPA), the laws of the European Union and the laws of most countries in which we operate all prohibit bribing government officials. Many countries also have laws that address bribes paid to private individuals.

Because of the complexity of anti-corruption and bribery laws worldwide, it is important that OHSU Members are aware of the requirements and ask questions if they have any doubts about the proper course of action. If you have questions, contact your supervisor or the OHSU Legal Department.

### Our Responsibilities

- Never offer, provide, promise to offer or authorize money or any item of value to get business or to influence a business decision.
- Never make payments that are intended to improperly influence a government official.
- Remember the phrase “government official” applies not only to politicians and civil servants but also to officials of state owned or controlled commercial enterprises, representatives of public international organizations, office seekers, political parties and party officials.
- Contact the Integrity Department if you become aware of any unethical conduct by a supplier or vendor.

## 6.3 Fraud Waste, and Abuse Prevention and the False Claims Act (FCA)

OHSU takes fraud, waste and abuse seriously. We comply with all laws and regulations that are designed to prevent and detect fraud, waste and abuse in government programs.

**Fraud:** The intentional deception or misrepresentation made by a person with the knowledge that the deception could result in some unauthorized benefit to him/herself or some other person or entity.

**Waste:** Primarily the overutilization of services, or other practices that, directly or indirectly, result in unnecessary costs to the Medicare program. Waste is generally not considered to be caused by criminally negligent actions but rather the misuse of resources.

**Abuse:** Relates to practices that are inconsistent with sound fiscal, business or medical practices and which result in unnecessary costs. This includes the destruction, diversion, manipulation, misapplication, maltreatment or misuse of resources.

OHSU is responsible for the money and other resources it receives from the government for patient care, research and education. OHSU has in place policies, procedures and controls designed to ensure that there is oversight of these funds and that the claims we submit for payment will be just and accurate. Our processes are designed to prevent improper billing and to prevent, detect and correct incorrect payments.

### Our Responsibilities

- Only request payment for services actually rendered or allowable costs incurred depending on the nature of the work performed. Always code data accurately (such as coding of medical billings or grant expenditures) to ensure proper billing, reporting and the integrity of the appropriate management systems.
- Ensure that all financial reports, technical reports and requests for payment submitted to the government and other external agencies are accurately documented.
- Never engage in unlawful or inappropriate practices that could result in a false claim being made. This may include but is not limited to: misrepresenting a diagnosis to justify services, unbundling charges to enhance payment, billing for services that are not medically necessary, coding unallowable costs to a grant, knowingly certifying an effort statement that is incorrect or applying costs to a grant for the purpose of spending it out.
- Base all billing on substantiating documentation. Follow all policies related to billing and documentation.
- Never submit a false claim. The Federal False Claims Act prohibits knowingly submitting a false claim to a federal payer for reimbursement. Examples of “false claims” include but are not limited to:
  - Making a false statement regarding a claim for payment;
  - Falsifying information in medical records, financial reports, technical reports or requests for payment;
  - Double billing for items or services or unbundling services for higher payment;
  - Requesting payment for unallowable costs;
  - Billing for services not performed or finished; and
  - Submitting claims that involve violations of other laws or rules, such as the anti-kickback laws.

### The False Claims Act ‘Whistleblower’ or ‘qui tam’ Provisions

The False Claims Act includes provisions that allow private persons to file lawsuits in the name of the government for violations of the Act. The government may or may not choose to follow up on the information brought forward. If it does not act, the individual has the right to pursue the action independent of the government. If an entity is found in violation of the Act, the individual who brought the action forward may be entitled to a percentage of the recovery.

If you have a concern regarding submission of a claim for payment, there are many options for bringing this to the attention of OHSU. The False Claims Act does not require an individual to first report concerns to OHSU. However, if you have a legitimate concern regarding submission of claims for payment, OHSU requests being made aware in order to review the information, investigate and clarify or correct the situation promptly and appropriately.

Federal and state laws prohibit punishing, disciplining, discriminating or retaliating against a member because the member reports or discloses information about false claims or initiates or assists in a false claims action. A member who believes he or she is the victim of unlawful discipline, discrimination or retaliation may file a complaint with the Oregon Bureau of Labor and Industries.



## 6.4 Insider Trading

During our work for OHSU, we may hear information about publicly traded companies. It is important to know that we are prohibited from trading securities or passing information onto others (also known as “tipping”) who then trade on the basis of material information before it is made publicly available to ordinary investors.

### Our Responsibilities

- Refrain from buying or selling securities of any company on the basis of nonpublic information.
- Take extra precautions when responding to requests for Restricted Information, even from our business partners, strategic alliances or other vendors. Even casual conversation could be viewed as “tipping” of inside information.

## 6.5 Political Involvement

OHSU recognizes the important role that it plays as a member of the broader community and supports the right of OHSU Members involved in civic and community activities. It is also important to make a clear distinction between one’s personal political activities and those undertaken on behalf of OHSU. However, this section does not restrict the right of an OHSU Member to express personal political views.

### Political Activities

**Political activities:** are activities that promote or oppose any political committee or any initiative, referendum or recall petition, measure or candidate. Political activities do not include activities related to promoting or opposing legislative bills, unless the bill is one that results in a referral to an election.

Oregon law and OHSU policies place certain restrictions (outlined in Policies No. 03-30-003 and No. 03-30-005) on the political activities of public employees, which apply to all OHSU employees and volunteers. Specifically, no OHSU employee or volunteer while on the job during working hours shall:

- Solicit any money, influence, service or other thing of value,
- Otherwise promote or oppose any political committee,
- Promote or oppose the nomination or election of a candidate,
- The gathering of signatures on:
  - An initiative,
  - Referendum or recall petition,
  - The adoption of a measure, or
  - The recall of a public office holder.

### Our Responsibilities

- Consistently make it clear that your personal, political views and actions are your own and not those of OHSU. In particular, be mindful of your position of authority at OHSU in your political activities.
- Avoid activities that may appear to connect your personal political thoughts or positions with OHSU such as, editorials or social media.
- Do not use OHSU resources (i.e. computers, telephones, supplies, etc.) for any political activity except those sanctioned by OHSU Government Relations.
- Refrain from holding or campaigning for a political office that could create, or appear to create, a conflict of interest with your duties.
- Never make political or charitable contributions with the intent to improperly exert influence.

You are also required by Oregon law to abide by the restrictions outlined in the following notice:

#### ATTENTION ALL PUBLIC EMPLOYEES

The restrictions imposed by the law of the State of Oregon on your political activities are that no public employee shall solicit any money, influence, service or other thing of value or otherwise promote or oppose any political committee or promote or oppose the nomination or election of a candidate, the gathering of signatures on an initiative, referendum or recall petition, the adoption of a measure or the recall of a public office holder while on the job during working hours. However, this section does not restrict the right of a public employee to express personal political views.

It is therefore the policy of the state and of your public employer that you may engage in political activity except to the extent prohibited by state law when on the job during working hours.



# Code of Conduct and You

As an OHSU Member, it is your responsibility to:

- Read, understand and follow the Code and other OHSU policies and procedures.
- Abide by the principles of the Code.
- Ask questions regarding the contents of the Code and understand how the contents relate to your position at OHSU.
- Inform the OHSU Integrity Department if you receive a notice of exclusion or the Department of Public Safety if you are convicted of a crime, per Policy No. 03-10-011.
- Promptly report any concerns related to this Code, other OHSU policies and/or other requirements as described in the Asking Questions and Reporting Concerns section.







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