



MOREHOUSE SCHOOL OF MEDICINE CODE OF CONDUCT AND ETHICS

# INTEGRITY... IT'S IN YOUR HANDS



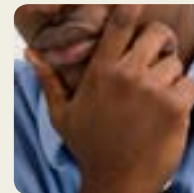
## MISSION

Morehouse School of Medicine is dedicated to improving the health and well-being of individuals and communities; increasing the diversity of the health professional and scientific workforce; and addressing primary health-care needs through programs in education, research, and service, with emphasis on people of color and the underserved urban and rural populations in Georgia and the nation.

## CORE VALUES



**KNOWLEDGE:** continuously creating, acquiring and communicating science-based information to better understand and enhance the human condition.



**WISDOM:** encouraging, promoting and supporting the exchange of knowledge and experience to cultivate insight, discernment and good judgment in our scholarly service, and administrative endeavors.



**EXCELLENCE:** consistently achieving the highest level of performance and upholding the highest standards of ethical behavior while taking individual and collective responsibility for our actions and outcomes.



**SERVICE:** maintaining an environment that exceeds expectations, holds every individual in high regard and esteem and treats all patients and clients with compassion and empathy.



Dear Colleagues,

Morehouse School of Medicine has achieved significant accomplishments during our short history. We are a national leader in educating primary care physicians and are recognized as the top institution among U.S. medical schools for our social mission. Our success is directly attributable to you.

Whether you are caring for patients, training the physicians of tomorrow, translating discoveries into therapies and products to improve healthful living, ameliorating ethnic and geographic health disparities, or nobly supporting one of these endeavors – you have helped build this institution. The strong reputation Morehouse School of Medicine enjoys in the academic, research and medical communities we serve is in your hands.

You help earn our strong reputation and the trust Morehouse School of Medicine enjoys every single day. This Code of Conduct and Ethics was developed to help guide us in our daily activities and interactions with colleagues, patients and others with whom we work. We ask that you review this Code carefully. Your understanding of it and commitment to it are crucial to our continued success.

When you have questions, do not hesitate to ask for guidance. This Code applies to each and every one of us – faculty, residents, students and all staff members. It will help you deal with the legal and ethical questions you may encounter in your daily work. You are required to sign a [Compliance Certification](#) annually stating you understand this Code, as well as Morehouse School of Medicine policies and the laws that govern your area of responsibility, and are committed to upholding this Code. You not only have the responsibility to be accountable for your own actions but also to hold your colleagues accountable for theirs. The integrity of Morehouse School of Medicine is in your hands.

With all of us working together, we can ensure a learning environment, workplace and workforce that are fully committed to honesty, fairness and integrity as we work to achieve our mission of improving the health and well-being of individuals and communities. If you have any questions regarding the Code of Conduct and Ethics and/or the policies referenced, please do not hesitate to speak with your immediate supervisor or contact the Chief Compliance Officer at 404-756-8919.

Valerie Montgomery Rice, M.D.  
President and Dean

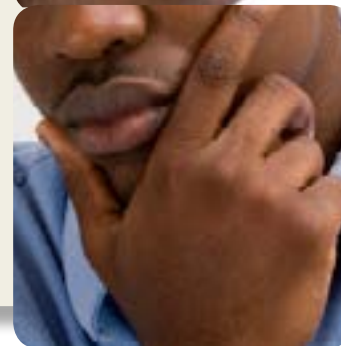
Art Collins  
Chairman of the Board  
Board of Trustees



## VISION

Morehouse School of Medicine will be known as the nation's leading community-focused, research-driven and student-centered medical school recognized for its:

- Preeminence in the conduct of research and translation of discovery into community solutions and improved patient care that contributes to the elimination of health disparities
- Model educational environment that nurtures and supports the achievement of academic excellence
- Leadership in creating models and best practices of integrative, culturally competent and community empowered health and healthcare
- Significant contributions to the diversity of the health-care and scientific workforce and the development of leadership committed to improving the health of vulnerable populations and the nation's healthcare system.





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## HOW TO USE THIS CODE OF CONDUCT AND ETHICS

Throughout this Code you will find links to Morehouse School of Medicine policies and guidelines, handbooks and other materials, as well as recurring elements that will help you better understand your responsibilities, act with integrity and know the law.

- “Your Quick Guide to the Code” – Highlights key content and related policies at the beginning of each section.
- Dialogue Boxes – Provide examples of appropriate conduct.



## BE ACCOUNTABLE

At Morehouse School of Medicine, we measure success by achieving our goals with the highest moral and ethical standards.

## UNDERSTAND AND ADHERE TO THE CODE

The Morehouse School of Medicine Code of Conduct and Ethics is our institution-wide guide and reference for faculty members, students, residents and all staff members, and it will guide how you represent Morehouse School of Medicine.

- Know and comply with the laws, regulations and accreditation standards that apply to your role
- Take the appropriate training
- Ensure proper standards and policies are implemented

## COMPLY WITH THE LAW AND REGULATIONS

In addition to our own standards and policies, Morehouse School of Medicine is governed by a variety of laws (federal, state and local), regulations and accreditation standards.

## EXCLUSIONS AND CONVICTIONS

It is required that you inform your supervisor, the Human Resources Department or the General Counsel's Office if you:

- Are convicted of a felony
- Have sanctions imposed against your professional license
- Are informed by the U.S. Office of Inspector General that you are no longer eligible to participate in federal or state reimbursement programs or contracts

## HOLD OTHERS ACCOUNTABLE

The work you do impacts others – not only the patients and students, but also your colleagues. You owe it to each other to uphold this Code and to model appropriate behavior at all times.

- Maintain and promote Morehouse School of Medicine's culture of ethics and compliance
- Always act to stop violations of the Code or the law
- Never place the achievement of business results ahead of ethical conduct or compliance with the Code or law

## RESPONSIBILITIES OF SUPERVISORS AND MANAGERS

As a supervisor or manager, you are required to set a personal example of integrity in all aspects of your job. You are responsible for promoting Morehouse School of Medicine's culture of ethics and compliance.

- Properly train all employees so they understand their responsibilities under the Code
- Maintain an open-door policy, responding to questions that you can answer and seeking help when you need it
- Take prompt and appropriate action when a suspected violation of law or Morehouse School of Medicine policy is brought to your attention



## NO RETALIATION

Morehouse School of Medicine is committed to a policy of no retaliation for employees who in good faith report compliance or integrity concerns. If you raise an issue honestly or participate in an investigation, you will continue to be treated with respect. You will not be subject to harassment, discrimination or any other adverse employment action, such as separation, demotion, suspension or loss of benefits. If you believe someone has retaliated against you, report the matter to the Chief Compliance Officer at 404-756-8919.

All reports of non-compliance should be made in good faith and with the best of intentions. "In good faith" simply means that the employee actually believes or perceives the information reported to be true. It is a serious violation of Morehouse School of Medicine policy for any person to intentionally make false accusations, and this will result in disciplinary action up to and including termination of the accuser.

## ASKING QUESTIONS AND REPORTING CONCERNS

While this Code covers many situations you may encounter, it does not address every circumstance or establish every rule. If you have questions or need clarification, seek guidance. If you are aware of actions that are inconsistent with the Code, report them. There are several ways to get answers to your questions or report concerns.

### ASK A QUESTION OR REPORT A CONCERN IN PERSON

- Discuss your concern with your supervisor or manager
- Discuss your concern with your Human Resources representative
- Discuss your concern with the appropriate Vice President or Associate Dean
- Discuss your concern with the Office of Compliance

### ASK A QUESTION OR REPORT A CONCERN ANONYMOUSLY

If you are uncomfortable taking the personal approach or if you have not been able to resolve an issue to your satisfaction through these other channels, call the Compliance Hotline at 404-756-1364 to report a concern anonymously. (Leaving your name and number generally makes investigating reports easier and more effective.)



## INTEGRITY... IT'S IN YOUR HANDS INSTITUTION-WIDE

### UPHOLDING PROFESSIONAL INTEGRITY...

- **Understand your** role in the success of Morehouse School of Medicine and our mission
- **Be familiar with the laws and regulations**, as well as Morehouse School of Medicine/Morehouse Healthcare policies and procedures, that apply to your specific job and level of responsibility and follow them, acting with integrity in all matters
- **Speak up and inform your supervisor/management of any issues** that may interfere with your ability to fulfill your professional responsibilities
- Take responsibility for **maintaining the integrity and quality of your job performance**
- **Never furnish a service or take any action that would violate a** professional code of ethics or practice act

### IN EVERYTHING YOU DO:

- Follow Morehouse School of Medicine 's policies, procedures and safety standards
- Uphold the highest business and ethical standards
- Conform to all applicable laws, government regulations and accreditation standards

### MOREHOUSE SCHOOL OF MEDICINE CODE OF CONDUCT AND ETHICS





## YOUR QUICK GUIDE TO THE INSTITUTION-WIDE SECTION OF THE CODE

WHAT YOU NEED TO KNOW AND WHY + WHERE TO GO FOR MORE INFORMATION

KEY AREAS OF COMPLIANCE	WHY IS IT IMPORTANT?	LAWS, POLICIES AND GUIDELINES
WORKPLACE ENVIRONMENT	TO CREATE A WORK FRIENDLY ATMOSPHERE AND A CULTURE OF COLLABORATION	TITLE IX AND STATE HARASSMENT LAWS; WAGE AND HOUR LAWS
ENVIRONMENTAL HEALTH AND SAFETY	TO HELP OUR EMPLOYEES, PATIENTS, STUDENTS AND GUESTS FEEL SAFE AND PROTECTED	OSHA LAB SAFETY
EXTERNAL INTERACTIONS	TO SET A TONE OF HONESTY AND INTEGRITY	CONFLICT OF INTERESTS
REPORTING LAWS AND REGULATIONS	TO SHOW WE ARE GOOD CORPORATE CITIZENS RESPECTFUL OF LAWS AND REGULATIONS	ANTITRUST ACCOUNTING AND REPORTING; FINANCIAL AUDITS



KNOW THE LAW

ACT WITH INTEGRITY

UNDERSTAND YOUR RESPONSIBILITIES

### MOREHOUSE SCHOOL OF MEDICINE

Morehouse School of Medicine is a diverse institution dedicated to training tomorrow's leaders in science, medicine and public health, and improving the healthcare of vulnerable populations. As such, we are expected to comply with various laws and regulations that govern our work. *That's why it's important to always act responsibly and with integrity in everything we do.* The Code of Conduct and Ethics is one of many tools that we provide to guide and demonstrate our commitment to following the law and adhering to high standards of ethical conduct. All Morehouse School of Medicine associates should be familiar with the Code and what it represents.

#### BE ALERT

1. It is not enough to just comply with the laws and regulations
2. We have to accurately file reports on our compliance
3. Always know and complete your annual training and reporting requirements



## INTERACTING IN THE WORKPLACE

Morehouse School of Medicine is committed to creating and maintaining a positive workplace and learning environment. As a Morehouse School of Medicine associate, you have a responsibility to

- Review the [Human Resources Policy and Procedure Manual](#) to learn more about Morehouse School of Medicine/Morehouse Healthcare policies and programs
- Treat others fairly and with respect – never use aggressive, threatening or violent behavior to intimidate another person
- Treat all colleagues, patients, visitors, medical staff members or applicants the same regardless of that individual's race, color, citizenship status, national origin, ancestry, gender, gender identity, sexual orientation, age, disability, religion, creed, marital status, veteran status, veteran or military status, political affiliation, or other classification prohibited by law
- Avoid comments and behavior that may be offensive or regarded as harassment

**Any allegations of misconduct involving discrimination and/or harassment should be reported to the Office of Compliance, Office of Legal Affairs, Human Resources or Title III Office immediately. Cooperate in any investigation that may result.**

## DEFINING HARASSMENT

Verbal, physical or visual harassment is defined as behavior that creates a hostile or offensive environment. Examples of harassment include, but are not limited to:

- Threats, derogatory comments, slurs or epithets
- Harassing email messages, tweets or social media posts
- Telling or forwarding jokes, such as racial or ethnic ones, that disparage someone's protected status
- Verbal comments or physical contact of a sexual nature
- Unwelcome sexual advances
- Posting, forwarding or sharing of offensive jokes, cartoons or emails

## Example

Did you hear that Dean John Doe's niece was hired as director of marketing and communications?

I did, and the rumor mill has begun already with comments about nepotism.

That's quite unfair as Jane is more than qualified. She has an M.B.A. in marketing from a major university in Florida and has spent the last five years as assistant director of marketing at another college.

[For related policy information, click here.](#)



## ENSURING A SAFE WORK ENVIRONMENT

Protecting the health and safety of our employees and students is a top priority at Morehouse School of Medicine. We are committed to providing a safe and effective workplace and learning environment. We will act promptly to address any unhealthy or unsafe conditions, and we expect the same of you.

- Never bring any weapon onto any Morehouse School of Medicine/Morehouse Healthcare property
- Never sell, use, possess or be under the influence of alcohol or drugs in the workplace or on Morehouse School of Medicine/Morehouse Healthcare property
- Always adhere to workplace safety practices as specified by the Occupational Safety and Health Administration (OSHA)
- Never use tobacco products or paraphernalia on Morehouse School of Medicine/Morehouse Healthcare property
- Comply with [government regulations](#) and [Morehouse School of Medicine/Morehouse Healthcare policies](#) relating to workplace safety
- Identify potential hazards in your workplace and report unsafe conditions immediately

See-[Pharmaceuticals and Disposal of Infectious Materials](#)

## MORE INFORMATION

[Infection Control Handbook](#)

[Occupational Safety and Health Administration \(OSHA\) Regulations](#)

[Standard Precautions for Potentially Infectious Materials](#)

[Facility-level Safety and Emergency Plans](#)

[Office of Disability Services](#)

## Example

Our colleague seems to have lost his mental edge. By day's end, he is slurring his words.

I noticed that too. Do you think he is drinking during the day?

I suspect so. We better alert our supervisor.

[For related policy information, click here.](#)



## DEALING WITH OTHERS

Your job may require you to deal with patients, suppliers, competitors, vendors and others authorized to act on behalf of Morehouse School of Medicine or provide services to Morehouse School of Medicine. Always deal honestly, fairly and ethically with all.

- Follow all [Morehouse School of Medicine contracting policies](#)
- Evaluate objectively all bids and vendors on the merits of price and performance
- Never take unfair advantage of anyone through manipulation, concealment or abuse of power or authority
- Do not misrepresent material facts

## GIFTS, MEALS AND ENTERTAINMENT

At times you may be offered personal gifts, meals or entertainment, or other personal favors from customers or suppliers. You may accept common business courtesies of nominal value only if doing so does not compromise your ability to make business decisions in the best interest of Morehouse School of Medicine/Morehouse Healthcare or exceed the following limitations.

- Try to avoid receiving any cash gifts
- Report gifts and other benefits for you or family members that exceed a value of \$100 per calendar year from any vendor to the Office of Compliance
- Do not accept extravagant or frequent personal gifts or other personal benefits from vendors
- Never request a meal, entertainment, personal gift or other benefit from a vendor
- Never accept gifts, meals or entertainment in excess of normal business courtesy that may appear to obligate Morehouse School of Medicine to do business with a particular contractor or vendor
- Health providers dealing with pharmaceutical, medical equipment and device sales personnel should not accept gifts or meals

## Example

We received funding to purchase new lab equipment.

That's great. Does the source of funding require a competitive bid or is there an exception?

I'm not sure.

Always check with the Grants and Contracts Office to see what is permissible.

[For related policy information, click here.](#)



## AVOID CONFLICTS OF INTEREST

Avoid conflicts of interest and the appearance of impropriety. A “conflict of interest” occurs if the possibility exists that a business or personal relationship may adversely influence your judgment, objectivity or loyalty in performing your business activities and duties for Morehouse School of Medicine/Morehouse Healthcare. Remember: In your job, you are acting on behalf of Morehouse School of Medicine.

- Disclose immediate family members or relatives that currently work for Morehouse School of Medicine and the department as this may be a potential conflict
- Never steer business to a vendor in which you have or a family member has a personal financial interest
- Never take advantage of a business opportunity presented to Morehouse School of Medicine for your own purposes
- Avoid conducting private business on Morehouse School of Medicine/Morehouse Healthcare time
- Never let a second job/outside employment interfere with your responsibilities to Morehouse School of Medicine or compromise your ability to protect confidential or proprietary information (*Disclose any second job/outside employment to your supervisor and to the Human Resources Department*)
- Disclose to the Office of Legal Affairs if your spouse or other immediate family member is employed by a competitor or contractor with Morehouse School of Medicine or if you have any investments or financial interests with such entities
- Discuss any questions about whether a specific situation presents a conflict of interest with your supervisor or manager, the Office of Legal Affairs or the Office of Compliance

## MORE INFORMATION

Because of the nature of Morehouse School of Medicine/Morehouse Healthcare’s work, avoiding conflicts of interest is critical to protect the integrity of our research and healthcare practices as well as our educational institution. Refer to the documents below for more specific guidance:

[FAQ for Financial Conflicts of Interest-Faculty and Investigators](#)

[Institutional Conflicts of Interest](#)

[Research Conflicts of Interest](#)

[Policy & Guidelines for Interaction with Pharmaceutical, Biotechnology, Medical Device, and Hospital & Research Equipment Supply Industry](#)

[Board of Trustee Conflicts of Interest](#)

[Nepotism Policy](#)

## Example

I just got appointed to the board at Healthy Hospital.

That’s great news but you’ll want to let the Office of Legal Affairs know.

Why?

Because it could present a conflict of interest as Healthy Hospital competes with Morehouse Healthcare.

[For related policy information, click here.](#)



## PROTECT ASSETS AND RESOURCES

You are expected to manage Morehouse School of Medicine/Morehouse Healthcare assets – both tangible and intangible – and other resources honestly and wisely. These include property of joint ventures or other entities that are controlled or managed by Morehouse School of Medicine, financial assets and “intellectual” property. “Intellectual” property refers to confidential or proprietary formulas, processes, inventions, pricing information, provider agreements, financial information, development plans and other information that has not been made public and would be of interest to a competitor or other party if disclosed.

- Always use Morehouse School of Medicine assets for business purposes only
- Obtain proper authorization in accordance with [Morehouse School of Medicine policies](#) before committing funds or disposing of surplus, obsolete or unusable resources
- Comply with [established policies, procedures and internal controls](#) when managing Morehouse School of Medicine financial assets
- **Never use MSM funds for non-business related use**
- Never disclose confidential or proprietary information to individuals outside Morehouse School of Medicine or to other employees who do not need the information to perform their duties unless expressly authorized by a supervisor or manager
- Protect all confidential and proprietary information against theft, loss and unauthorized disclosures
- Report immediately any missing property or any unusual circumstances surrounding the disappearance of Morehouse School of Medicine assets to a supervisor, manager or the Finance Department

## PROPER USE OF TECHNOLOGY

You have access to and use of email, voicemail, the intranet, the Internet and other electronic media so you can do your job more efficiently and effectively. These technology resources allow you to easily communicate with each other and with contractors, suppliers, customers, government agencies and academic institutions. Always follow appropriate password requirements, and use common sense and good judgment when using technology. Be aware that Morehouse School of Medicine/Morehouse Healthcare may monitor or access your use of the institution’s information systems at any time.

- Comply with [Morehouse School of Medicine/Morehouse Healthcare policies](#) and applicable laws, rules and regulations, including [HIPAA](#), when using technology
- Do not use these resources for creating, accessing, transmitting or viewing threatening, obscene or [harassing materials](#)
- Never share proprietary systems or software with other companies or persons
- Obtain approval from the Information Technology Office before installing or using software on Morehouse School of Medicine/Morehouse Healthcare computers

### Example

I finished making the scrapbook for the dean’s retirement gift.

I thought your personal computer was at the repair shop.

It is, so I downloaded the scrapbook software onto my MSM laptop so I could finish the gift. Why the concern?

It’s against MSM policy to download software onto Morehouse School of Medicine computers without permission.

[For related policy information, click here.](#)



## ACCOUNTING AND FINANCIAL REPORTING

Ensure all internal and external Morehouse School of Medicine/Morehouse Healthcare financial records and reports are prepared accurately and on a timely basis and reflect the true operations and financial condition of Morehouse School of Medicine/Morehouse Healthcare. These include financial reports that are made public or sent to government agencies, accrediting bodies or other entities that provide funding for Morehouse School of Medicine.

- Comply with [Morehouse School of Medicine/Morehouse Healthcare policies](#), generally accepted [accounting principles](#) and applicable [government regulations](#) that apply to documents, records and reports (paper and electronic) in your area of responsibility
- Preserve documents that are known to be subject to a government investigation, commercial litigation or audit; adhere to Morehouse School of Medicine [Record Retention Policy](#)
- Enforce internal controls to ensure that contracts, payments and other business transactions are properly authorized, conform to Morehouse School of Medicine/Morehouse Healthcare policies and procedures and are recorded accurately
- Promptly report any material error or omission that may affect our disclosures or any questionable accounting or auditing matters to a supervisor, the Controller, the Vice president of Finance or to the Office of Compliance.
- Correct promptly any incorrect information reported to the public, government agency or to an accrediting body; when correcting external financial reporting, review with the Department of Finance prior to submission.

See - [Grants and Contracts](#)

See - [Record Retention Policy](#)

## FINANCIAL AUDITS

If you are involved with a financial audit:

- If you are contacted by an external financial auditor, please contact the Senior Vice President of Operations/Chief Financial Officer prior to disclosure of any financial documents
- Cooperate fully with Morehouse School of Medicine/Morehouse Healthcare independent, internal and/or external auditors
- Make sure information provided to internal and external auditors is accurate, complete and not misleading
- Avoid any action that could compromise or appear to compromise the objectivity of Morehouse School of Medicine/Morehouse Healthcare independent auditors

**CODE OF ETHICAL CONDUCT  
FOR FINANCIAL MANAGERS**

If you supervise or manage accounting functions or the preparation of public financial reports, you must acknowledge and agree to abide by a special code of conduct stressing personal responsibility for integrity, completeness and accuracy of financial recording and reporting.

[The Financial Code](#) requires full, fair and accurate disclosure of material financial and operational information in periodic reports to government agencies, accrediting organizations and the public.

Read this code, and sign the [Compliance Certification Code of Ethical Conduct for Financial Professionals](#) and return it to Office of Compliance.



## COMPLY WITH LAWS

Morehouse School of Medicine/Morehouse Healthcare associates are expected to comply with all federal, state, and local laws and regulations that apply to our academic, healthcare and business activities. You are required to familiarize yourself with all the laws, rules and regulations that apply to your work responsibilities. You must conduct business ethically and honestly, and act in a manner that enhances our standing in the community.

## MARKETING AND ADVERTISING

- Fairly and accurately describe Morehouse School of Medicine/Morehouse Healthcare services in all marketing and advertising presentations and literature
- Do not advance claims Morehouse School of Medicine/Morehouse Healthcare cannot support, make promises Morehouse School of Medicine/Morehouse Healthcare cannot keep, or engage in deceptive marketing or advertising practices
- Respect copyright and trademark rules when using materials published by others

## FRAUD AND ABUSE LAWS

- Federal law and many state laws prohibit “kick-backs” or other improper inducements to or from anyone for the referral of a patient or for the purchase of healthcare products or services. Federal law also prohibits the use of gifts or other financial benefits to induce a Medicare patient to receive care at a Morehouse School of Medicine/Morehouse Healthcare related facility.

## ANTITRUST, EXPORT AND COMPETITION LAW

Morehouse School of Medicine/Morehouse Healthcare competes fairly and does not use unlawful, monopolistic or predatory practices to restrict competition. Be aware of all applicable laws when pursuing joint ventures or alliances with other healthcare providers and when participating in trade associations.

- Never discuss or agree with a competitor to set prices or compromise the integrity of a competitive bidding process
- Never exchange information with a competitor or supplier about pricing, bids, contracts, business plans or other confidential business matters, including but not limited to prices for goods and services, salaries, benefits and payment rates
- Never participate in group boycotts of other healthcare professionals, providers, or commercial payers
- Never make any arrangement with a competitor to artificially reduce competition

## PROFESSIONAL PRACTICE ACTS

Morehouse School of Medicine/Morehouse Healthcare is committed to upholding applicable state professional practice acts and professional codes of ethics at all times. Be aware of and promote compliance of these standards.

## ENVIRONMENTAL LAWS

Morehouse School of Medicine/Morehouse Healthcare is committed to complying with applicable laws and regulations related to protecting the environment and continually diminishing our impact on the environment.

## EXPORT CONTROLS AND FOREIGN CORRUPT PRACTICES ACT

Morehouse School of Medicine/Morehouse Healthcare is committed to upholding federal laws and regulations regarding Export Controls and the Foreign Corrupt Practices Act. Be familiar with and comply with these standards when conducting business.

- Always check to see if U.S. government approval, e.g., a license, is needed before allowing “foreign nationals” to participate in research, partnering with a foreign entity or sharing technology in any manner with foreign nationals. “Foreign nationals” is defined as persons who are not U.S. citizens or legal permanent residents or legally recognized asylees and refugees.
- Never offer something of value (money, meals or other gifts) to foreign government officials in order to obtain or retain government or private business, direct business to a particular party or obtain an unfair advantage



## DEALING WITH GOVERNMENT AGENCIES

Depending on your role, a government agency may contact you to gain information about an investigation. Document the name of the agent, the agency, the subject of the investigation and any other relevant information and pass this information along to the appropriate contact as noted below:

- Office of Legal Affairs (404-752-1895) handles all non-routine investigations of Morehouse School of Medicine/Morehouse Healthcare, individuals or other institutions
- Office of Compliance (404-756-8919) handles investigations conducted by the Office of Inspector General, Centers for Medicare & Medicaid Services, Occupational Safety & Health Administration, Environmental Protection Agency and/or Food & Drug Administration
- Office of Government Relations (404-752-1833) serves as the liaison to officials and agencies of the U.S. government and the State of Georgia as well as membership organizations, associations, consortia, and alliances with whom Morehouse School of Medicine has common interests

If the government agent wants to arrange a personal interview with you, the Office of Legal Affairs can explain your rights and obligations and respond to any questions you may have.

- Never intentionally make false or misleading statements to a government official or advise another employee to do so
- Do not destroy or alter a Morehouse School of Medicine/Morehouse Healthcare document or record in anticipation of a government subpoena or other government request for documents

## DEALING WITH THE MEDIA

If you are contacted by local or national media, refer the call to the Office of Marketing and Communications (404-752-1888). Should the Office of Marketing and Communications coordinate a media interview with you, be sure to obtain specific approval from the Office of Legal Affairs prior to disclosing any material and confidential or non-public information to the public.

## LOBBYING AND POLITICAL ACTIVITIES

All lobbying and political activities carried out by or on behalf of Morehouse School of Medicine/Morehouse Healthcare must conform to applicable federal and state regulations.

- Office of Government Relations must approve and supervise all lobbying and other government advocacy at the federal and state level
- Morehouse School of Medicine/Morehouse Healthcare funds, facilities and assets should not be used to support a political candidate or party unless exceptions, where expressly permitted by state law, are approved by the Office of Government Relations or the Office of Legal Affairs
- Morehouse School of Medicine/Morehouse Healthcare will not reimburse employees for any personal political contributions
- Associates should not use Morehouse School of Medicine/Morehouse Healthcare assets for personal political activity or engage in personal political activity during work hours

## FUNDRAISING

Morehouse School of Medicine/Morehouse Healthcare complies with all applicable laws and regulations and Morehouse School of Medicine/Morehouse Healthcare policies and procedures when it comes to fundraising.



## INTEGRITY... IT'S IN YOUR HANDS ACADEMICS

### EDUCATING THE NEXT GENERATION OF HEALTHCARE LEADERS...

- Provide the **optimum environment** for student development
- **Develop and implement strong programs** through instruction, research and service in public health
- Adapt to changing environments, **display flexibility** and learn to function in the face of uncertainties inherent in the healthcare educational environment
- **Promote lifelong learning** through continuing education

### IN EVERYTHING YOU DO:

- Follow Morehouse School of Medicine's policies, procedures, and safety standards
- Uphold professional and accreditation standards
- Conform to all applicable laws, government regulations, and accreditation standards

MOREHOUSE SCHOOL OF MEDICINE CODE OF CONDUCT AND ETHICS





## YOUR QUICK GUIDE TO THE ACADEMIC SECTION OF THE CODE

WHAT YOU NEED TO KNOW AND WHY + WHERE TO GO FOR MORE INFORMATION

KEY AREAS OF COMPLIANCE	WHY IS IT IMPORTANT?	LAWS, POLICIES AND GUIDELINES
TEACHER LEARNER RELATIONSHIP	TO DEMONSTRATE FAIR TREATMENT AND RESPECTFUL RELATIONSHIPS BETWEEN FACULTY AND STUDENTS	SACS LCME
STUDENT PRIVACY	TO SHOW RESPECT FOR A STUDENT'S RIGHTS TO PRIVACY	FERPA
HBCU FUNDING	TO BE PART OF A PROUD HISTORY OF UNIVERSITIES AND COLLEGES DEDICATED TO EDUCATING MINORITIES AND CREATING DIVERSITY	TITLE III



KNOW THE LAW

ACT WITH INTEGRITY

UNDERSTAND YOUR RESPONSIBILITIES

### OUR ACADEMIC COMMITMENT

Morehouse School of Medicine is an academic institution dedicated to the education and training of physicians, biomedical scientists and public health practitioners committed to improving the health and healthcare of vulnerable populations. The education that begins here provides the student a foundation for a lifelong course of learning. Morehouse School of Medicine seeks to provide an environment where students can develop the attitudes, knowledge, skills and responsibilities required for meeting the health needs of individuals and of society today and in the future.

MSM IS FULLY ACCREDITED BY:

- Liaison Committee on Medical Education (LCME), a body of the Association of American Medical Colleges (AAMC)
- Southern Association of Colleges and Schools (SACS)

The Residency Programs are accredited by the Accreditation Council for Graduate Medical Education (ACGME).

See - [page 23 for Accreditation Requirements.](#)



## THE EDUCATIONAL EXPERIENCE

Students, postgraduate trainees, residents, fellows and faculty are expected to foster an effective and supporting learning environment of mutual respect and collegiality among teacher and learners.

All Morehouse School of Medicine administrators, faculty and staff are charged with:

- Providing instruction, guidance, inspiration and leadership in learning
- Helping learners gain the knowledge, competencies and skills required for their professional health roles
- Evaluating academic performance solely on the basis of academic standards
- Fostering relationships in a harassment-free environment

## TEACHER RESPONSIBILITIES

Teachers are expected to prepare appropriately for the educational interaction, maintaining a high level of subject matter knowledge and ensuring that course content is current, accurate, representative and appropriate. They should be aware of and able to implement alternative instructional strategies to effectively contribute to the intellectual development of the students. Teachers also should be familiar with this Code and abide by the policies and procedures provided in the Morehouse School of Medicine [Faculty Handbook](#).

Morehouse School of Medicine Teachers should:

- Never enter into dual-role relationships with students that are likely to detract from student development or lead to actual or perceived favoritism
- Always ensure assessments of student performance are valid, open, fair and congruent with course objectives
- Always respect the educational goals, policies and standards of Morehouse School of Medicine

See - [Faculty Handbook](#)

## TEACHER-LEARNER POLICY

Morehouse School of Medicine's Teacher-Learner Policy prohibits mistreatment, including inappropriate behavior, abuse, harassment and discrimination, of students. For more details, refer to the [Teacher Learner Relationship Brochure](#).

## Example

I don't understand why your grade is so much higher than mine when we basically have the same answers.

Maybe it's because I'm attentive in class and don't interrupt the professor all the time.

Surely not, as all faculty are expected to objectively evaluate a student's academic performance.

[For related policy information, click here.](#)



## STUDENT RESPONSIBILITIES

Students are expected to exercise their freedom to learn with responsibility. Students should make an appropriate professional investment of energy and intellect to acquire the knowledge and skills necessary to become an effective healthcare professional. They should abide by the policies and procedures provided in the Morehouse School of Medicine [Student Handbook](#).

Morehouse School of Medicine students should:

- Always present original work as part of course assignments or requirements, or Morehouse School of Medicine-sponsored extracurricular activities
- Never provide or receive unauthorized assistance in the taking of examinations, test or quizzes or in the preparation of any other performance requirements of a course
- Demonstrate integrity, accountability and respect to the educational process

### PLAGIARISM IS PROHIBITED

Presenting the work or ideas of others as one's own is plagiarism, which is no different from cheating. This behavior will not be tolerated and may lead to termination.

See - [Student Handbook](#)

## REGISTRAR RESPONSIBILITIES

Office of the Registrar serves as the main repository for all student information, including background check reports. Staff is responsible for the timely and accurate delivery of enrollment services, ranging from facilitating the registration process and processing transcript requests to performing degree verifications and maintaining the academic records of all current and former students.

All Office of the Registrar staff should:

- Comply with and abide by all federal and state laws that apply to Morehouse School of Medicine and the Confidentiality and Release of information about students, particularly Family Educational Rights and Privacy Act (FERPA) of 1974
- Release permanent records to comply with a subpoena or court order only with the consent and advice of the institution's legal counsel
- Keep only those records that are necessary to meet Morehouse School of Medicine's or the student's goals

"PERMANENT EDUCATION RECORDS" are defined as any information or data recorded in any medium, including but not limited to handwriting, print, tapes, file, microfilm and microfiche, of persons who are or have been in attendance at Morehouse School of Medicine. This information includes forms, such as clinical evaluations, academic performance correspondence, student requests, registration information, unofficial academic transcripts, grade reports and admissions information.



## CONFIDENTIALITY OF EDUCATIONAL RECORDS

We are committed to maintaining the trust of our students through strict enforcement of legal and ethical standards relating to confidentiality.

All Morehouse School of Medicine administrators, faculty and staff should:

- Actively respect the privacy of and safeguard student educational records
- Never share a student's educational information with other Morehouse School of Medicine faculty or staff unless there is "legitimate educational need" for that information
- Never share a student's personal information, including grades, transcripts, financial aid information, disciplinary actions, social security number, birthdate, race and ethnicity, and more, without the student's written consent

A faculty or staff member has a "legitimate educational need" to access or review a student's educational record if that faculty or staff member is:

- Performing a task that is specified in his/her job description or contract
- Performing a task related to a student's education or discipline
- Preparing references at a student's request

## FAMILY EDUCATIONAL RIGHTS AND PRIVACY ACT OF 1974 – FERPA

**FERPA** protects the rights of students and ensures the privacy and accuracy of student educational records. This Act applies to all institutions that are the recipients of federal aid administered by the Secretary of Education.

### WHO DOES FERPA CONCERN?

- Students
- Faculty and staff working with students

### WHAT DOES FERPA ACCOMPLISH?

- Protects the privacy and accuracy of student educational records, including:
  - Personal information
  - Privileged information

### WHAT DO YOU NEED TO DO?

- Take training
- Follow Morehouse School of Medicine policies and procedures to uphold FERPA

## DIRECTORY INFORMATION

Under FERPA, Morehouse School of Medicine may disclose appropriately designated "directory information" without written consent, unless you have advised to the contrary in accordance with Morehouse School of Medicine's policies and procedures. Morehouse School of Medicine considers the following information as directory information:

- Student's name, address and telephone number
- Place of birth
- Major or field of study
- Participation in officially recognized activities
- Hometown, hobbies and general interest items
- Dates of attendance
- Campus mailbox and email address
- Degree applied for or received
- Honors and awards received
- Previous educational institutions attended
- Residency program match results

**Please note directory information may be restricted with prior written consent from the student.**

## Example

I left a stack of graded papers on my desk in the classroom.

Did you lock the door?

No.

You better go back and get the papers or lock the doors because if any student goes through the graded papers it's a FERPA violation.

[For related policy information, click here.](#)



### TITLE III GRANT PROGRAM

As a Title III Grant recipient, Morehouse School of Medicine's Title III Grant program conforms to the highest standards of ethical, and professional responsibility as well as fiscal responsibility. Even so, individuals are charged with knowing and following all regulations and guidelines established by the federal government. All participating departments are required to report progress on selected goals and objectives so the Title III Administration Office can monitor progress and prepare required and related reports for internal and external review.

MSM staff and faculty are required to:

- Be familiar with allowable activities covered by Title III Grants
- Submit accurate, truthful and complete records when reporting on progress
- Comply with Morehouse School of Medicine policies and procedures as well as federal laws, regulations and requirements

#### WHAT IS THE TITLE III GRANT PROGRAM?

The Title III Grant Program is designed to support historically black colleges and universities and its graduate institutions, providing financial assistance to establish or strengthen physical plants, financial management, academic resources and endowments with the goal of decreasing reliance on governmental financial support and encouraging reliance on endowments and private sources. Over the years, this Grant Program has had a major impact on institutional growth and development at Morehouse School of Medicine. Today, Title III Grant funds are being used in five areas:

- Academic instruction
- Student services and outcomes
- Development
- Funds and administration management
- Project management

### ACCREDITATION

Besides providing a common set of requirements and standards under which we operate, our [LCME](#), [SACS](#) and [ACGME](#) accreditations foster public confidence in Morehouse School of Medicine as an educational enterprise and assist in gaining federal funding for financial aid and other programs. Morehouse School of Medicine is committed to ensuring the reaffirmation processes for accreditation conform to the highest ethical, professional and fiscal responsibility.

All Morehouse School of Medicine administrators, faculty and staff should:

- Be familiar with and understand the reaffirmation process
- Facilitate measurable, continuous improvement in education, student services, research, administrative services, and community and public service
- Help assess compliance in your area by providing supporting documentation
- Complete follow-up activities requested by accreditation organizations

#### MORE INFORMATION

- [“The Principles of Accreditation: Foundation for Quality Enhancement”](#)
- [Procedures of the Commission on Colleges](#)



## INTEGRITY... IT'S IN YOUR HANDS MOREHOUSE HEALTHCARE

### PROVIDING QUALITY CARE AND SERVICE...

- **Maintain a patient-focused healthcare delivery system** that is culturally sensitive and cost-effective
- Exemplify a firm commitment to our values, support the mission and vision and **consistently adhere to the principles of honesty, fairness and loyalty**
- **Meet or exceed the needs and expectations** of your internal and external customers in all that you do
- **Recognize each person as a distinct individual** with specific needs and concerns and respect his/her dignity with compassion and empathy
- Embrace creativity, innovation and risk-taking to **facilitate measurable, continuous improvements in education, research and service**
- **Accept responsibility** for the consequences of your actions

### IN EVERYTHING YOU DO:

- Follow Morehouse Healthcare's clinical policies, procedures and safety standards
- Uphold professional and accreditation standards
- Conform to all applicable laws and government regulations

### MOREHOUSE SCHOOL OF MEDICINE CODE OF CONDUCT AND ETHICS





## YOUR QUICK GUIDE TO THE MOREHOUSE HEALTHCARE SECTION OF THE CODE

WHAT YOU NEED TO KNOW AND WHY + WHERE TO GO FOR MORE INFORMATION

KEY AREAS OF COMPLIANCE	WHY IS IT IMPORTANT?	LAWS, POLICIES AND GUIDELINES
PATIENT PRIVACY	RESPECT FOR PATIENT'S SECURITY	HIPAA
RESIDENT	TO CREATE A QUALITY LEARNING ENVIRONMENT AND QUALITY PATIENT CARE	ACGME
BILLING AND CODING	SO WE ARE REIMBURSED CORRECTLY FOR THE CARE WE PROVIDE	CENTER FOR MEDICARE AND MEDICAID SERVICES (CMS), PRIVATE PAYER POLICIES
FRAUD AND ABUSE	TO SHOW WE MAKE DECISIONS BASED ON PATIENT NEED	HHS OFFICE OF THE INSPECTOR GENERAL (OIG)



KNOW THE LAW

ACT WITH INTEGRITY

UNDERSTAND YOUR RESPONSIBILITIES

## OUR MOREHOUSE HEALTHCARE COMMITMENT

Excellent healthcare services extend beyond delivering compassionate patient care and employing the latest medical research and techniques. Excellent healthcare services are about creating a caring and secure environment in which:

- A patient's questions and concerns are promptly and courteously addressed
- Healthy living is promoted
- Providers have current credentials and the expertise necessary to provide or support the patient care
- Clinical research is conducted to improve the community's overall health and to uphold the Morehouse School of Medicine values

## QUALITY CARE

We are committed to providing high-quality care and skilled, compassionate, reliable service to our patients and to Atlanta's multicultural community. That means delivering considerate, courteous, and respectful care without regard to race, creed, disability, gender, age, sexual orientation or national origin. That means providing care that conforms to acceptable clinical and safety standards and honoring our Patient Bill of Rights.

- Conduct a proper evaluation of every patient before initiating a treatment plan
- Have the credentials, experience and expertise necessary to perform your duties
- Honor the rights of patients to receive timely information, including charges for services rendered
- Maintain complete and thorough records of patient information to fulfill the requirements set forth in our policies, accreditation standards, applicable laws and regulations



## PATIENT BILL OF RIGHTS

Every patient who comes to Morehouse Healthcare for healthcare has certain rights, and we make every effort possible to guard:

- The right to receive the best quality of healthcare, regardless of the patient's ability to pay
- The right to be treated with respect, consideration, and dignity
- The right to obtain a second opinion elsewhere
- The right to change physicians for any reason
- The right to participate in the decisions made regarding the patient's health
- The right to have all questions answered
- The right to express concerns and suggestions to the management of Morehouse Healthcare with the assurance that legitimate grievances will be promptly addressed and resolved to the patient's satisfaction

## SAFETY

Since safe care is essential to the well-being and recovery of our patients, you should know our health and safety policies and processes, as well as the laws and regulations, which apply to your specific job responsibility.

- Ensure maintenance of equipment used to provide treatment is performed and documented in accordance with manufacturer's instructions
- Properly handle and dispose of infectious materials, including blood and other bodily fluids, used needles and syringes, potentially toxic chemicals and other materials, that may present a hazard to prevent the spread of infection, illness and disease
- Comply with the laws and Morehouse School of Medicine/Morehouse Healthcare policies that govern your work with pharmaceuticals, prescription drugs and controlled substances, including orders, storage, administration and inventory

If you are aware of or suspect a lapse of securing or the inappropriate distribution of drugs, you should report it immediately to your supervisor, Office of Compliance, Office of Human Resources or the Morehouse School of Medicine Compliance Hotline at 404-756-1364.

## Example

I heard Dr. John Doe got a DUI this weekend.

Is that just a rumor or is it a fact?

It's fact.

Then you or Dr. Doe need to notify HR promptly as that could impact his professional license.

For related policy information, [click here](#).



## CONFIDENTIALITY

We are committed to maintaining the trust of our patients through strict enforcement of legal and ethical standards relating to confidentiality. Respect the privacy of both patients and colleagues by carefully maintaining and managing confidential and proprietary information.

- Actively protect and safeguard patient information — in oral, written and electronic form
- Discuss or share medical, clinical or business information only when access is supported by a legitimate clinical or business purpose and is in compliance with Morehouse School of Medicine/Morehouse Healthcare policies and procedures, and applicable laws, rules and regulations
- Do not discuss patient or other confidential information in any public area, including but not limited to elevators, hallways, stairwells, restrooms, lobbies and dining areas
- Do not disclose information regarding our financial performance without appropriate approval

### HEALTH INSURANCE PORTABILITY AND ACCOUNTABILITY ACT HIPAA

#### WHO DOES IT CONCERN?

Patients  
Government  
Morehouse School of Medicine/  
Morehouse Healthcare

#### WHAT DOES HIPAA ACCOMPLISH?

Ensures protection of health information  
Prevents identity theft  
Shows we care and have policies and procedures to safeguard patient privacy

#### WHAT DO YOU NEED TO DO?

Understand the law  
Take the appropriate training  
Follow Morehouse School of Medicine/  
Morehouse Healthcare policies and procedures to ensure patient privacy and to uphold HIPAA

#### WHAT IS PROTECTED HEALTH INFORMATION (PHI)?

PHI includes any information attributed to an individual patient, such as but not limited to:

- Name, social security number, address, and birth date
- Diagnosis and treatment
- Appointment and/or surgery dates
- Insurance information
- Financial status and payment method

Only access PHI if you require patient information to furnish care, perform quality control activities, bill or collect charges for services, or furnish other administrative services unless you are authorized under the law or by the patient.

#### Example

Are you going to Dr. Sanderson's housewarming party?

Yes, but I misplaced her address.

Pull it from Morehouse School of Medicine's database.

I can't do that. That would be a violation of PHI.

[For related policy information, click here.](#)



## BILLING AND CODING

We are committed to ensuring that all billing and coding are accurate and that documentation exists to support the services rendered and the amounts charged. Maintain complete and thorough records to comply with our policies and procedures as well as applicable laws and regulations. Report errors in claims and any billing system in a timely manner to your supervisor or the Office of Compliance.

- Accurately document for all services rendered
- Bill for services according to medical necessity guidelines and submit timely billing claims
- Ensure you have the latest coding and billing updates
- Waive copayments, coinsurance and deductibles only in accordance with established rules, policies and procedures
- Issue statements and other communications that are accurate, complete and truthful and that comply with applicable laws and regulations

## FRAUD IS PROHIBITED

- Do not knowingly submit a false or fraudulent claim for payment to the federal government for Medicare, Medicaid or other federally financed healthcare program
- Do not use false statements or records for the purpose of obtaining an improper payment from the federal government for Medicare, Medicaid or other federally financed healthcare programs or concealing the receipt of such payment
- Do not use false statements or records in claims-related filings and reports

## KICKBACKS

Kickbacks, or other improper inducements to or from anyone for the referral of a patient or for the purchase of healthcare products or services, are prohibited. Know that improper inducements may be indirect (e.g., a payment or concession made to a third party with the expectation that it will be passed onto a referral source). Even the mere offer of a kickback or improper inducement could be a violation of law and subject an employee and Morehouse School of Medicine/Morehouse Healthcare to criminal prosecution.

## Example

A patient just sent a check for treatment covered by insurance.

Are you going to keep the funds and apply them to future medical care?

No, overpayments must be promptly identified and returned to payers.

[For related policy information, click here.](#)



## THE RESIDENT EXPERIENCE

Graduate Medical Education (GME) is at the heart of the Morehouse School of Medicine mission as physicians-in-training, known as Residents, assume their role in Morehouse Healthcare's clinical practice.

All Morehouse School of Medicine administrators, faculty and staff are charged with:

- Providing a positive and supportive learning environment for Residents
- Helping Residents gain the clinical knowledge, competencies and skills required for the effective treatment and management of patients
- Ensuring that the academic and clinical educational experience balances patient care and safety with the welfare and well-being of Morehouse School of Medicine Residents

**Example**

My shift just ended but I forgot to include a note about one patient's care in her chart.

You better go back and add it or call the resident replacing you.

You're right. I didn't properly complete the patient hand-off.

A proper patient hand-off is a critical part of patient care.

[For related policy information, click here.](#)

See - [GME Policy Manual](#)

## RESIDENT RESPONSIBILITIES

Morehouse School of Medicine Residents are expected to be familiar with this Code and abide by the policies and procedures provided in the Morehouse School of Medicine [GME Policy Manual](#).

Morehouse School of Medicine Residents should:

- Demonstrate integrity, accountability, respect, compassion, patient advocacy, and dedication to patient care that supersedes self-interest
- Demonstrate a commitment to ethical principles pertaining to the provision or withholding of clinical care, confidentiality of patient information and informed consent
- Know the limits of their scope of authority and comply with Morehouse School of Medicine policies and procedures, applicable laws and regulations

Additionally, Residents should conduct themselves with the utmost professionalism and be alert to anything that would impair their ability to provide patient care.

## MORE INFORMATION

Refer to the [Graduate Medical Education \(GME\) Policy Manual](#) for detailed policies, practices and procedures for Residents and Morehouse School of Medicine staff who supervise Residents.



## INTEGRITY... IT'S IN YOUR HANDS RESEARCH

TRANSLATING DISCOVERIES TO IMPROVE HEALTHFUL LIVING...

- **Develop robust research programs** that embrace basic, clinical, health services and community-based research endeavors
- **Protect patients and human subjects** and their rights throughout the research process
- **Ensure the humane care and use of laboratory animals** in the research process
- **Safeguard the privacy and security** of your research data

IN EVERYTHING YOU DO:

- Follow Morehouse School of Medicine's policies, procedures and safety standards
- Uphold professional and accreditation standards
- Conform to all applicable laws, government regulations and accreditation standards, as well as sponsor requirements

MOREHOUSE SCHOOL OF MEDICINE CODE OF CONDUCT AND ETHICS





## YOUR QUICK GUIDE TO THE RESEARCH SECTION OF THE CODE

WHAT YOU NEED TO KNOW AND WHY + WHERE TO GO FOR MORE INFORMATION

KEY AREAS OF COMPLIANCE	WHY IS IT IMPORTANT?	LAWS, POLICIES AND GUIDELINES
CONFLICTS; GRANTS AND CONTRACTS	TO SHOW WE ARE RESPONSIBLE FOR ADHERING TO GRANT REQUIREMENTS	DEPARTMENT OF PUBLIC HEALTH
HUMAN SUBJECT SAFETY	TO SHOW WE CARE ABOUT PEOPLE	IRB HHS
LAB AND ANIMAL SAFETY	TO SHOW WE HAVE A SAFE AND HUMANE ENVIRONMENT	EHS IACUC CLAR OSHA
OFFICE OF TRANSLATIONAL TECHNOLOGIES (OTT)	TO SHOW WE ARE ON THE FOREFRONT OF HEALTHCARE	EAR ITAR DoD DHS DEPT OF COMMERCE DEPT OF STATE



KNOW THE LAW

ACT WITH INTEGRITY

UNDERSTAND YOUR  
RESPONSIBILITIES

## OUR RESEARCH COMMITMENT

At Morehouse School of Medicine, research is a key part of our mission to correct health inequities and serve disadvantaged populations. Morehouse School of Medicine is committed to observing the highest ethical standards when developing research proposals and conducting research. Protecting patients and human subjects and their rights during research, investigations and clinical trials is a top priority as is ensuring the humane care and use of laboratory animals in research and education.

### KEY AREAS OF COMPLIANCE/CONCERN

- Conflicts of Interest
- Institutional Review Board (IRB) Compliance
- Environmental Health and Safety (EHS) Standards
- Intellectual Property
- Grants and Contracts



## INVESTIGATOR RESPONSIBILITIES

All research projects must be approved in advance to help ensure adherence to Morehouse School of Medicine guidelines and policies, federal and state laws and regulations, as well as sponsor requirements. Investigators also must complete all necessary training before starting research.

All Morehouse School of Medicine Investigators are charged with:

- Adhering to honest and verifiable methods in proposing, performing, evaluating and reporting research activities
- Assuring research protocols measure up to standards established by federal regulations as well as Morehouse School of Medicine guidelines and policies
- Having the appropriate qualifications and training to carry out the procedures described in the research
- Implementing the necessary safety guidelines

As a Principal Investigator or Mentor, you should:

- Demonstrate integrity and accountability for the entire research process
- Make sure any staff or students participating in your research are adequately trained

## GRANTS AND CONTRACTS

As research grant recipients, Morehouse School of Medicine associates are accountable to the federal agencies and other research sponsors. Morehouse School of Medicine has established multiple internal regulatory committees to ensure all funded research conforms to the highest standards of ethical, compassionate and professional responsibility as well as fiscal responsibility. Even so, individual Investigators are charged with knowing and following all regulations and guidelines established by the agency or sponsor supporting their research.

Morehouse School of Medicine Investigators are required to:

- Submit accurate, truthful and complete accounting, record keeping and billing records
- Certify their own effort reports
- Comply with Morehouse School of Medicine policies and procedures as well as with federal laws and regulations, and sponsor requirements

## Example

I spent 20 hours this week conducting research on Grant A and Grant B.

How much of your time was focused on Grant A?

Only 25 percent of it.

Make sure you only report 5 effort hours to Grant A then.

[For related policy information, click here.](#)

## MORE INFORMATION

For more details, refer to the policies, guidelines and practices of the following federal agencies and to Morehouse School of Medicine policies:

- [National Institutes of Health \(NIH\) Public Access Policy – ensures the public has access to the published results of NIH-funded research](#)
- [Public Health Service \(PHS\)](#)
- [Health and Human Services \(HHS\)](#)
- [Office of Management and Budget \(OMB\)](#)
- [Research Integrity Policy](#)
- [Conduct of Research Policy](#)



## RESEARCH INVOLVING HUMAN SUBJECTS

Morehouse School of Medicine has guidelines and policies in place to protect the safety, autonomy, dignity and privacy of individuals who have volunteered to be human research subjects in studies conducted by Morehouse School of Medicine. To further assure the protection of human research subjects' rights and welfare, the Institutional Review Board (IRB) Committee must review and approve all research activities in advance.

All Morehouse School of Medicine Investigators must:

- Promptly report any unanticipated problems involving risks to human subjects or others
- Complete and pass the Collaborative IRB Training Initiative (CITI) Course to meet the National Institutes of Health's requirement before starting any human subjects research regardless of the funding source
- Comply with the [IRB Guidelines, Policies and Procedures](#) when conducting research

Morehouse School of Medicine is charged with reporting noncompliance with federal regulations, state laws and agency regulations or IRB requirements.

### MORE INFORMATION

Research involving human subjects is also governed by numerous federal regulations, including:

- [Office for Human Research Protection \(OHRP\)](#) – for those projects conducted or supported by the U.S. Department of Health and Human Services (HHS)
- [U.S. Food and Drug Administration \(FDA\) Protection of Human Subjects](#) – applies to all clinical investigations regulated by the FDA
- [FDA Human Subjects Research Regulations](#) – provides guidelines on good clinical practices and trials
- [Department of Health and Human Services Protection of Human Subjects](#) – applies to all research conducted, supported or otherwise subject to regulation by any federal department or agency
- [The Belmont Report](#) – outlines guidelines to ensure ethical conduct for biomedical and behavioral research

### ADDITIONAL TRAINING AND EDUCATION RESOURCES

- [NIH Human Research Protections Course](#) – a free ethics training course for protecting human research participants
- [IRB Educational Handouts](#) – information from continuing education activities

### Example

One of my human subjects just informed us that she is pregnant.

Have you sent a report to the IRB?

Yes, and I've explained how the research will be brought under compliance as to pregnant subjects.

[For related policy information, click here.](#)



## RESEARCH INVOLVING LABORATORY ANIMALS

At Morehouse School of Medicine, we are committed to the humane care and use of laboratory animals for research purposes. Our practices are consistent with the federal laws and policies, including but not limited to those set by the Public Health Service and the National Institutes of Health, and the USDA's [Animal Welfare Act](#). Morehouse School of Medicine has centralized the care of research and teaching animals in the Center for Laboratory Animal Resources (CLAR). Access to the facility is restricted to authorized Investigators with CLAR and Institutional Animal Care and Use Committee (IACUC) approval. All Investigators and CLAR personnel are charged with treating the animals humanely all the time.

All Morehouse School of Medicine Investigators must:

- Obtain approval from the IACUC for all projects and protocols using animals prior to starting any study
- Obtain approval from the Biosafety and/or Radiation Safety Committee when applicable
- Follow all applicable laws and policies, including the Animal Welfare Act, the [Public Health Service Policy on Humane Care and Use of Laboratory Animals](#) and the principles of the [Guide for the Care and Use of Laboratory Animals](#)
- Attend CLAR Orientation and complete required LATA online training
- Update skills and knowledge base as part of a continuing education program offered by CLAR
- Review the Occupational Health and Safety Program (OSHA) and comply with its provisions
- Adhere to all Morehouse School of Medicine policies, procedures and guidelines (i.e. CLAR, IACUC, etc.), as well as federal, state and local laws and regulations

## REPORTING CARE OR SAFETY CONCERNS

If you have any concerns or complaints about care or safety, you should contact the Research Subject Advocate (RSA) at 404-752-1140.

If the issue isn't resolved, contact the Morehouse School of Medicine Chief Compliance Officer at the Compliance Hotline at 404-756-1364.

If the issue cannot be resolved at the institutional level, contact the Joint Commission's Office of Quality Monitoring via email [complaint@caho.org](mailto:complaint@caho.org) or 1-800-994-6610.

## Example

I'm not sure if I need to use an analgesia on the mice or not.

Will the procedure cause more than momentary or slight pain or distress to the mice?

Yes, it will.

Then you need appropriate sedation, analgesia or anesthesia unless the procedure is justified for scientific reasons in writing.

[For related policy information, click here.](#)



## PATENTING INTELLECTUAL PROPERTY

In fostering research, educational and technical endeavors related to the advancement of scientific knowledge, Morehouse School of Medicine recognizes some activities may lead to inventions that can significantly impact the healthcare industry and the way we live. Morehouse School of Medicine encourages patenting inventions made by members of the Morehouse School of Medicine community while using Morehouse School of Medicine facilities, resources and/or funds. As a result, Morehouse School of Medicine established the **Office of Translational Technologies (OTT)** to leverage Morehouse School of Medicine's intellectual property, research, infrastructure, and services and diversify research revenue.

Morehouse School of Medicine Inventors are charged with disclosing their inventions, discoveries and writings to the OTT. Should the invention be approved for patent application, OTT will submit information for patent protection. OTT also will work with the Inventor(s) to develop a marketing and licensing strategy if applicable, and then will execute that strategy.

[Refer to Intellectual Property on page 14 for more information.](#)

### THE BAYH-DOLE ACT

#### WHO DOES THE BAYH-DOLE ACT CONCERN?

Small businesses and non-profit institutions, such as Universities receiving federal funds for research projects

Investigators/Inventors leading those projects

#### WHAT DOES THE BAYH-DOLE ACT ACCOMPLISH?

Creates a uniform policy among federal agencies that fund research and permits small businesses and non-profit institutions, including Universities, to pursue ownership of inventions developed under federally funded research programs (i.e. technology transfer activities)

#### WHAT DO YOU NEED TO DO?

Understand the law

Take the "Proper Conduct of Research Training" online

Work with Morehouse School of Medicine's OTT to evaluate Intellectual Property for patent process

### Example

Did you hear? I received a patent on my discovery.

Congratulations! Be sure to maintain all notebooks, electronic files and other documents pertaining to your research.

I am prepared to give a copy to MSM upon request as required by school policies.

[For related policy information, click here.](#)



## COMPLIANCE CERTIFICATION

## ACKNOWLEDGEMENT OF CODE OF CONDUCT AND ETHICS

My signature on this form acknowledges that I have received the Morehouse School of Medicine Code of Conduct and Ethics. I understand that it fosters a culture of learning and safety and that it represents the mandatory policies of the organization and I agree to abide by it.

Signature: \_\_\_\_\_

Printed Name: \_\_\_\_\_

Position: \_\_\_\_\_

Department: \_\_\_\_\_

Date: \_\_\_\_\_

DRAFT