

# Code of Conduct



AT THE FOREFRONT

**UChicago**  
**Medicine**

Dear University of Chicago Medical Center Staff,

In our ongoing efforts to ensure that we at the University of Chicago Medical Center (“UCMC”) are able to provide quality care to our patients, it is vital that each member of the UCMC team be committed to ensuring compliance across the UChicago Medicine care environment. Part of this commitment is enshrined in our PRIDE Values, which outline how we expect members of the UChicago Medicine team to behave at work. It is critical that each individual holds him or herself, as well as colleagues, accountable to living the PRIDE Values so that we may deliver the best experience possible to our patients, their families, and visitors.

It is equally important that all of our team members conduct themselves with honesty and integrity, and assure that their colleagues, faculty, and staff do so as well. The practice of behaving honestly, ethically and with integrity is an individual responsibility. In order to fulfill this responsibility, we must all be knowledgeable of UCMC policies and procedures.

The UCMC Code of Conduct is central to our Compliance Program and is designed to give you the information and tools you need to understand and comply with UCMC’s standards for ethical and compliant behavior. The Office of Corporate Compliance and the Chief Compliance Officer oversee and support UCMC’s commitment to compliance. However, we will only be successful if we all commit to acting in compliance with all relevant state and federal laws, rules, and regulations, and UCMC policies, as well as adhering to the standards set forth in the Code of Conduct.

At the University of Chicago Medical Center, our people are our greatest asset. Thank you for your compassion and your dedication to maintaining our reputation for high quality patient care, education, research, and our commitment to ethical and professional conduct. Please carefully review the Code of Conduct and familiarize yourself with its content so that we can each commit to uphold its principles.

**Kenneth Polonsky, M.D.**

Executive Vice President of the University for Biology and Medicine  
President of the University of Chicago Health System

**Sharon O’Keefe**

President, UCMC

**Krista Curell**

Vice President of Accountable Care,  
Chief Compliance Officer

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## I. University of Chicago Medical Center Compliance Program

The University of Chicago Medical Center is committed to fostering a corporate culture of ethical behavior and integrity in all matters related to compliance with the laws and regulations that govern the delivery of health care. This goal is central to supporting patient care, research, and teaching at UCMC.

The University of Chicago Medical Center also is committed to providing quality health care services, education, and research in compliance with all applicable laws and regulations. UCMC has an Office of Corporate Compliance, which, through its Compliance Program, demonstrates UCMC's commitment to ethical conduct and compliance. The Office of Corporate Compliance plays a key role in promoting ethical business conduct and a culture of integrity, and serves as a compass to guide our workforce through the laws that govern the delivery and billing of health care services.

The Office of Corporate Compliance supplies information and tools to support employees, faculty, and students in their efforts to adhere to the Compliance Program and Code of Conduct principles and goals, which include the following:

- *Comply with health care laws and regulations;*
- *Provide medically necessary care to patients;*
- *Maintain accurate and reliable corporate records regarding billing and other transactions;*
- *Manage business relationships appropriately; and*
- *Encourage employee loyalty.*

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### Why do we have a Compliance Program?

Health care has become more complex in recent years, with an increased focus on financial considerations. In addition, federal and state governments have emphasized the importance of preventing and detecting instances of fraud and abuse in violation of state and federal health care laws and regulations. The primary way to prevent health care fraud and abuse has been the creation of compliance programs by members of the health care sector as a method of self-policing.

The Federal Department of Health & Human Services and its Office of the Inspector General (“OIG”) strongly urge all health care providers to implement effective corporate compliance programs not only to further advance the prevention of waste, fraud, and abuse in health care,

but to further the fundamental mission of all health care entities, which is to provide quality health care to patients. The OIG also recognizes that a sincere effort to comply with applicable federal and state standards through the establishment of an effective compliance program significantly reduces the risk of unlawful or improper conduct, and may in fact mitigate the severity of administrative penalties.

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### **Compliance Program Framework**

Effective compliance programs require a clear commitment to compliance that starts “at the top” of the organization. The University of Chicago Medical Center established its Compliance Program in 1998 through a Board resolution. The Audit Committee of the Board maintains oversight of the compliance program and receives quarterly updates in addition to an annual report. The Medical Center President is the chair of the Executive Corporate Compliance Committee, with administrative support from the Chief Compliance Officer and the Office of Corporate Compliance.

The University of Chicago Medical Center and Biological Sciences Division Corporate Compliance Committee is made up of senior management and faculty physician representatives. The Chief Compliance

Officer chairs this committee. The committee meets regularly to address compliance-related issues and establish policy. You may contact the Office of Corporate Compliance for more information about the activities of our Compliance Committees at (773) 834-4733.

The material summarized in this document is reviewed at all Compliance Education sessions, including new employee orientation and continuing education programs.

## **II. Reporting Compliance Concerns and Violations**

UCMC is committed to promoting conduct that is responsible, legally and ethically sound, and compliant with applicable federal, state, and local health care laws, regulations, and ordinances. All UCMC and Biological Sciences Division (“BSD”) employees are responsible for promptly reporting actual or potential wrongdoing, including actual or potential violations of law, regulation, policy, procedure, or the Compliance Program and Code of Conduct.

*You can report compliance concerns in one of the following ways:*

- 1.** Contact the Office of Corporate Compliance directly at (773) 834-4733;

2. Report directly to your immediate supervisor, departmental manager, the Department of Human Resources, or the Office of Legal Affairs at (773) 702-1057/ 24 Hour Pager #: 7602; or
3. Call the Compliance Resource Line at (877) 440-5480, or internally at (773) 834-3222.

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### Compliance Resource Line

The Compliance Resource Line is a toll-free phone line that may be used to obtain answers to questions relating to compliance and to report suspected or potential misconduct, violations of the Medical Center's compliance policies, or violations of the law. The Compliance Resource Line is available to receive messages 24 hours a day to all employees, contractors, temporary staff, medical staff members, and patients. Calls will be returned during normal business hours.

Callers may ask to remain anonymous and the Compliance Resource Line will not use any device that automatically identifies the source of the call. However, callers are reminded that in some circumstances their concerns cannot be adequately addressed unless certain information is revealed that may also reveal their identity.

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### Non-Retaliation, Non-Retribution for Reporting

Any report of a compliance concern will be treated as confidential and no adverse actions will be taken against an employee for the act of reporting concerns in good faith. Any such retaliation, retribution, or harassment is a violation of the UCMC's compliance policy. All instances of retaliation, retribution, and/or harassment must be reported to the Chief Compliance Officer, who along with the Compliance Committee and the Department of Human Resources, will investigate the circumstances and determine the appropriate response.

## III. Code of Conduct

The Code of Conduct is a critical component of UCMC's Compliance Program and guides us in carrying out our daily activities within appropriate ethical and legal standards. The standards set forth in this Code of Conduct require us to follow all applicable laws, rules, regulations, and organizational policies, particularly those related to the scope of each of our duties and responsibilities. The Code enables us to maintain an educational, health care, and business environment that is committed to integrity and ethical conduct.

These standards are mandatory and must be followed. Anyone who violates laws, policies, or our Code may be disciplined, up to and including termination. This is an evolving document that will be updated periodically to respond to changing conditions and to reflect changes in the law, although it is not intended to cover every situation that may be encountered.

Regardless of whether or not a situation is specifically addressed in our Code, it is the responsibility of all faculty and staff to:

- *Know and comply with the standards as they apply to your job;*
- *Avoid involvement in illegal, unethical, or otherwise improper actions;*
- *Seek guidance when confused or in doubt about your responsibilities;*
- *Report any known or potential violations of the Code;*
- *Cooperate in any investigations of any allegations of non-compliance; and*
- *Take responsibility for your actions.*

In some cases, a subject discussed in our Code involves such complexity that additional guidance may be needed. We encourage faculty and staff to raise questions and concerns to leadership and/or the Office of Corporate Compliance.

This Code is a reference point and is to be used in conjunction with other compliance and UCMC policies and is available on the Intranet at <http://home.uchospitals.edu/> and the Office of Corporate Compliance website at <http://compliance.bsd.uchicago.edu/>.

In addition, patients, faculty, and staff can call the confidential Compliance Resource Line with any concerns 24 hours a day at (877) 440-5480, or internally at (773) 834-3222. Calls will be returned during normal business hours.

Other important phone numbers can be found in Appendix A to this Code of Conduct.

## STANDARD 1

### QUALITY OF CARE

The University of Chicago Medical Center is committed to delivering the safest, highest quality, and most effective care to all of our patients. We strive to ensure that we provide each patient with the best possible care to reach optimal recovery from a condition or procedure, and to avoid injuries to patients in providing care that is intended to help them. We collect and report on numerous quality measures, and use this information to measure progress and set goals for the organization.

We treat all patients with dignity, courtesy, and respect. We actively listen to patients and are committed to providing clear, accurate, honest, and transparent information about the quality of care we offer so that they can make informed health care decisions. We provide care that is respectful of and responsive to individual patient and family preferences, needs and values, ensuring that patient values guide clinical decisions to the extent possible.

As health care providers, it is important for us to note errors or deficiencies, even those that seem small or insignificant, in order to improve future care. All UCMC personnel are encouraged to promptly report such matters to their supervisors in order to provide immediate support and

care to the patient when applicable. UCMC also maintains an aggressive Disclosure Program and encourages all staff to report errors to the Department of Risk Management and Patient Safety. Timely and transparent information is provided to the patient and their family members when appropriate. “Near Miss” events are also organized so that prospective improvements can be made.

We comply in all respects with the Emergency Medical Treatment and Active Labor Act (“EMTALA”) and offer an appropriate medical screening examination and stabilizing treatment to all patients who come to UCMC for emergency treatment or who are in labor, regardless of the patient’s ability to pay or insurance status. We transfer emergency patients only when they request a transfer or when we lack the capability or the capacity to provide appropriate treatment, and only after administering the appropriate stabilizing care.

## STANDARD 2

### PATIENT’S RIGHTS AND RESPONSIBILITIES AND FREEDOM OF CHOICE

Patients of The University of Chicago Medical Center have the right to be treated with dignity and respect, and to be admitted and receive quality health care

free from discrimination, regardless of race, ethnicity, culture, language, color, age, sex, sexual orientation, gender identity or expression, physical or mental disability, socioeconomic status, national origin, marital status, veteran status, religion, or any other classification protected by applicable law.

We know how important family members and significant others are in the care and recovery of our patients and are committed to making sure that all visitors enjoy full and equal visitation according to what the patient prefers. UCMC does not restrict, limit, or deny visitation based on gender identity, sexual orientation, or any other classification protected by applicable law.

UCMC will provide all patients with appropriate continuity of care and referrals. UCMC personnel will respect each patient's right to make decisions about their care by:

- *Providing all information necessary for the patient to give informed consent, including informing the patient about proposed procedures/treatment options and any associated risks and benefits, in a language that the patient can understand;*
- *Encouraging patients to make decisions about their health care, including the use or withdrawal of life-sustaining treatment;*

- *Respecting the patient's right to refuse treatment and care and to be informed by the treatment team of any anticipated medical outcome if care is refused; and*
- *Providing patients and their families with access to resources, upon request, to help patients explore options and issues to assist them in making informed health care decisions.*

### STANDARD 3

#### FALSE CLAIMS ACT

The University of Chicago Medical Center's Compliance Program is designed to ensure accurate billing, coding, and documentation for claims submitted to all payers, including federal health care programs such as Medicare and Medicaid.

Federal and state laws, including the federal False Claims Act, Illinois Whistleblower Reward and Protection Act, and the federal Program Fraud Civil Remedies Act protect government programs such as Medicare and Medicaid from fraud and abuse. It is a violation of the False Claims Act to knowingly submit, or cause another person or entity to submit, false claims for payment of government funds. UCMC is committed to submitting claims that are accurate and truthful in all respects and prohibits retaliation against

persons who report suspected violations.

UCMC does not hire employees, accept volunteers, or contract with or bill for services rendered by individuals or organizations excluded from participating in federal or state health care programs. This includes exclusion from those programs administered by the U.S. Department of Health and Human Services, U.S. General Services Administration, and the Illinois Department of Health and Human Services. We conduct initial excluded parties checks on potential employees, medical staff, vendors, and volunteers, as well as periodic excluded parties checks after the commencement of the relationship to ensure continued eligibility to participate in federal and state health care programs. All UCMC personnel have a duty to immediately report any change in their eligibility status to the Office of Corporate Compliance.

#### **STANDARD 4**

##### **CODING, BILLING, AND PATIENT ACCOUNTING**

The University of Chicago Medical Center strives to ensure that its billing and coding for health care services are accurate, complete, and reflect only those services actually provided and documented in the patient's medical record. UCMC will

not—and will not tolerate its employees or representatives to—knowingly present, or cause to be presented, claims for payment that are false, fictitious, or fraudulent.

UCMC and all of its employees and representatives make every effort to ensure that billing codes are assigned in a manner that accurately represents the services that were provided and documented in the medical record without inappropriately unbundling, upcoding, or submitting duplicate bills for the same service. In addition, UCMC submits bills for services provided by residents only when the supervision and presence of a teaching physician is appropriately documented.

When ordering services or items for which reimbursement will be sought, UCMC requires its physicians (or other health care professionals authorized by law to order items or services) to only order those services and items that are medically reasonable and necessary or appropriate. Medical documentation is prepared and entered into the patient's medical record for all services provided at UCMC locations. UCMC does not submit bills for any service that is not appropriately documented in the medical record.

UCMC expects its personnel who are responsible for coding, billing, and documentation to be knowledgeable about all UCMC

policies and procedures, and federal and state regulations regarding those activities. All personnel involved in billing, documentation, or claim submission are provided with appropriate training on a regular basis, but at least annually, so that they understand their obligations under applicable laws, rules, and regulations as well as UCMC policies and procedures.

## **STANDARD 5**

### **INTEGRITY OF COST AND OTHER FINANCIAL REPORTS**

The University of Chicago Medical Center maintains a high standard of accuracy and completeness in the documentation and reporting of all financial records and cost reports. Our financial information fairly represents actual business transactions and conforms to generally accepted accounting principles or other applicable rules and regulations. We maintain a system of internal controls to ensure accuracy and completeness in documenting, maintaining, and reporting financial information.

We cooperate fully with internal and external auditors and any regulatory agencies that examine our books and records. We treat credit balances and bad debt in compliance with applicable state and federal law. We endeavor to accurately track, report, and refund credit balances.

UCMC is committed to ensuring that all cost reports submitted to governmental and private payers are properly prepared and documented according to all applicable federal and state laws. In submitting and preparing cost reports, all costs are properly classified, allocated to the correct cost centers, and supported by verifiable and auditable data. It is our policy to correct any cost report preparation or submission errors and mistakes in a timely manner and, if necessary, we clarify procedures and educate employees to prevent or minimize recurrence of those errors.

## **STANDARD 6**

### **PROTECTION OF PRIVATE AND CONFIDENTIAL INFORMATION**

The University of Chicago Medical Center respects the privacy, and protects the confidentiality, of our patients' medical, demographic, and financial information, as well as the health care and business practices of UCMC.

We collect information about a patient's medical condition, history, medication, and family illnesses in order to provide quality care. We realize the sensitive nature of this information and are committed to protecting patient privacy. We do not access patient information, internally use patient information,

or disclose patient information outside the organization, except as necessary to perform our jobs.

We are committed to complying with state and federal privacy laws, including the Health Insurance Portability and Accountability Act (“HIPAA”), and to assisting patients with exercising their patient privacy rights. In accordance with HIPAA, UCMC personnel will not use or disclose a patient’s protected health information (“PHI”) unless given the patient’s written authorization or when authorized by law to use or disclose this information for treatment, payment, and health care operations. We maintain reasonable safeguards to limit incidental uses or disclosures of PHI, and use caution and professional judgement when handling PHI. We follow a “minimum necessary” standard and make reasonable efforts to limit the PHI used or disclosed to the minimum extent necessary to accomplish the intended purpose of the use, disclosure, or request.

An unauthorized disclosure of a patient’s PHI is subject to corrective action up to and including termination for the first offense, regardless of whether the information is accessed and/or disclosed in writing, orally, or electronically.

UCMC has a dedicated HIPAA Privacy and Security Program, which promotes ethical,

compliant behavior and integrity in all matters related to patient privacy and compliance with HIPAA. The HIPAA Privacy and Security Program provides information and tools to support employees, faculty, and students in their efforts to ensure the privacy and security of our patients’ health information. All employees, students, faculty, and clinical observers are required to complete UCMC privacy and security training at orientation and annually thereafter.

In addition to our requirements to protect the confidentiality of patient information, UCMC personnel have obligations to protect the confidentiality of UCMC’s business records. Unless required by law, UCMC personnel will not reveal or disclose:

- *Confidential medical staff or peer review information;*
- *UCMC’s proprietary or trade secret information to unauthorized individuals, including information that relates to UCMC’s business or financial activities or the activities of a vendor or contractor of UCMC; or*
- *Personnel records of UCMC employees.*

*Privacy concerns can be reported through the Compliance Resource Line at (877) 440-5480, or internally at (773) 834-3222.*

## STANDARD 7

### CREATION AND RETENTION OF PATIENT AND INSTITUTIONAL RECORDS

All University of Chicago Medical Center personnel are responsible for the integrity and accuracy of our organization's documents and records, not only to comply with regulatory and legal requirements, but also to ensure records are available to support our patient care, business practices, and actions.

UCMC complies with all local, state, and federal statutes and regulations, accreditation standards, and good business practices governing the creation and retention of patient and institutional records. All patient and institutional records are the property of UCMC, and the integrity of those records is critical. UCMC personnel responsible for the preparation and retention of records ensure that those records are accurately prepared and do not contain any false, fraudulent, fictitious, deceptive, or misleading information. UCMC securely maintains, controls, and protects records to prevent unauthorized access, alteration, or destruction. Medical and business documents and records are retained in accordance with the law and our records retention policy, which includes comprehensive retention schedules. The unauthorized destruction, removal, or use of records is prohibited.

## STANDARD 8

### GOVERNMENT REQUESTS FOR INFORMATION

It is the policy of the University of Chicago Medical Center to cooperate fully with any lawful government agency in relation to a survey, investigation, or audit, and to promptly and appropriately respond to government requests for information. The Medical Center expects all personnel to extend the same cooperation. Examples of government agencies that may request information or conduct an inspection or investigation include the Illinois Department of Public Health ("IDPH"), the Chicago Board of Health, Joint Commission, Food and Drug Administration ("FDA"), the Occupational Safety and Health Administration ("OSHA"), the Office of the Inspector General ("OIG"), the Federal Bureau of Investigations ("FBI"), and the Chicago Police. Requests for information may come in the form of a subpoena, summons, warrant, letter, or verbal request. Only certain individuals are authorized to facilitate these requests on behalf of the organization.

UCMC maintains a comprehensive policy that details the steps to be taken in the event a representative of any federal, state, or local agency contacts UCMC personnel for any reason related to their employment, such as to request information,

inspect the premises, or conduct an interview. In part, that policy requires UCMC personnel to follow these steps:

1. Ask the representative his name, the name of his agency, and his phone number;
2. Ask for the agent's business card and retain a copy; also ask to see his official identification;
3. Ask the representative the subject matter of the inquiry to help determine the appropriate administrative leaders to notify; and
4. Immediately page a supervisor and also call UCMC Office of Legal Affairs at (773) 702-1057. To page the Office of Legal Affairs, dial (773) 753-1880, then enter pager number 7602 and follow the prompts. If neither the General Counsel nor the Office of Legal Affairs can be reached, page the administrator-on-call through the hospital's operator at (773) 702-6800.

If possible, UCMC personnel should not provide any information, or allow anyone to access any systems or inspect any documents or areas of the Medical Center, before speaking with the General Counsel or the Office of Legal Affairs. If a government representative contacts a UCMC employee or representative to be interviewed or questioned about the Medical Center or Medical

Center business, the UCMC employee or representative may insist on having someone present from the Office of General Counsel or the Office of Legal Affairs before answering any questions. However, at no time should UCMC personnel attempt to impede or unduly delay a legitimate government inquiry or inspection.

In anticipation of, preparation for, or during a survey, investigation or audit, UCMC personnel must never conceal, destroy, or alter any documents, lie, or make misleading statements to the agency representative.

## STANDARD 9

### PREVENTING IMPROPER REFERRALS OR KICKBACKS

The University of Chicago Medical Center does not receive or pay anything of value in exchange for referrals of patients or any other business.

Federal and state laws and regulations, including the federal Physician Self-Referral Act (or "Stark" Law) and the Anti-Kickback Statute, generally govern financial relationships among health care providers. The Stark Law prohibits a physician from referring a patient for certain health care services to a facility with which that physician, or his or her family member, has a financial relationship,

unless a specific legal exception applies. Federal and state law also prohibits individuals and organizations from offering or receiving anything of value in return for, or to encourage, the referral of any patient or business. In addition, federal law generally prohibits anyone from offering anything of value to a Medicare, Medicaid, or Tricare patient in order to influence that person's decision to select or receive care from a particular health care provider.

In keeping with these laws, UCMC strictly prohibits faculty and staff from accepting gifts, favors, payments, services, or anything else of value, which might influence or appear to influence the actions of the organization. UCMC personnel are also strictly prohibited from offering or receiving anything of value to any organization, entity, or individual (including vendors, physicians, other hospitals, etc.) with the intent to induce or encourage referrals of any business or patients to or from the Medical Center or outside facilities.

UCMC provides detailed guidelines in its policies regarding the process for entering into financial arrangements with, and for providing non-monetary compensation to, physicians and other potential referral sources. If you have any questions regarding these requirements, please consult with the Office of Corporate Compliance or the Office of Legal Affairs.

## STANDARD 10

### ADHERENCE TO ANTITRUST REGULATIONS

The University of Chicago Medical Center complies with all applicable state and federal antitrust laws and regulations, and conducts business in a manner that promotes fair competition. We do not engage in activities or negotiate agreements that restrain or obstruct competition. For example, UCMC personnel should not agree, or attempt to agree, with a competitor to artificially set prices or salaries. UCMC is also prohibited from sharing or using with competitors proprietary information that is not normally available to the public, such as pricing information or information about salaries and benefits.

## STANDARD 11

### AVOIDING CONFLICTS OF INTEREST

The University of Chicago Medical Center strives to conduct clinical, health care, and personal business in a manner that will avoid actual or potential conflicts of interest, or the appearance thereof. Our patients and community expect us to make decisions that are not biased by personal interests and UCMC personnel and staff will not use their official positions to influence a UCMC decision in

which they have a financial interest. We take care to avoid actual or perceived conflicts of interest that may compromise our ability to provide patient care, transact business, or make purchasing decisions, or that pose a risk to the operations and reputation of the hospital. One aspect of an appropriate business environment is taking particular care in relationships with those who do business or want to do business with the hospital, seeking to avoid not only actual improprieties, but also the appearance of impropriety.

UCMC places its trust and confidence in its personnel and medical staff members, and these individuals must exercise care in all relationships with vendors or potential vendors of UCMC and refrain from actions that may harm UCMC. Examples of these kinds of activities include:

- *Using funds, property, or resources of UCMC for a non-UCMC purpose;*
- *Using work time compensated by UCMC for personal benefit;*
- *Transacting UCMC business on terms that are less advantageous than those competitively available or those available through arms-length dealing; and*
- *Accepting or soliciting anything of value, either in the form of a gift, contributions, or*

*other items of value from vendors or potential vendors that is not specifically permitted by UCMC policy.*

Various UCMC faculty and staff also provide full disclosure of possible conflicts of interest, in accordance with UCMC and University of Chicago policies.

## STANDARD 12

### EXTERNAL RELATIONS

The University of Chicago Medical Center personnel adhere to fair business practices and accurately and honestly represent themselves and UCMC's services and products. UCMC personnel demonstrate integrity and truthfulness in all marketing and advertising pertaining to UCMC's facilities and services. Vendors who contract to provide goods and services shall be selected on the basis of quality, cost-effectiveness, and appropriateness for the identified task or need, in accordance with UCMC policy.

UCMC negotiates and enters into fair and equitable contractual arrangements with reputable vendors and individuals that meet the needs of our organizations. All arrangements must comply with applicable federal and state laws. Prior to executing arrangements for items and services, we verify that all contracted parties are eligible to participate in federal and state-funded health care programs.

## STANDARD 13

### EQUAL EMPLOYMENT OPPORTUNITIES

The University of Chicago Medical Center provides equal employment opportunity to all applicants and employees without regard to race, ethnicity, culture, language, color, age, sex, sexual orientation, gender identity or expression, physical or mental disability, socioeconomic status, national origin, ancestry, marital status, civil union status, parental status, veteran status, disability status, religion, or any other legally protected classification, in accordance with applicable law.

UCMC is committed to providing a professional, respectful, and safe work environment that is free from harassment or discrimination on the basis of any legally protected classification for all employees, patients, and visitors in accordance with applicable law. UCMC actively promotes diversity in its workforce at all levels of the organization and will not tolerate unlawful harassment or discrimination of those who work at UCMC.

UCMC will make reasonable accommodations to the known physical and mental limitations of otherwise qualified individuals with disabilities in accordance with applicable law.

Personnel records of UCMC employees are treated as

confidential except as required by applicable law.

## STANDARD 14

### CLINICAL RESEARCH

The University of Chicago Medical Center maintains high standards of ethical behavior for faculty, staff, and students involved in research. Integrity in research includes not just the avoidance of wrongdoing, but also the rigor, carefulness, and accountability that are the hallmarks of good scholarship.

UCMC policies and programs ensure protection for research participants. All clinical research conducted by UCMC investigators and involving human subjects, regardless of its source of financial support, is subject to approval by the Institutional Review Board (“IRB”), unless otherwise exempt. UCMC conducts clinical research in a manner consistent with the ethical principles set forth in the Declaration of Helsinki and the Belmont Report. IRB policies and procedures provide guidance for complying with other federal, state, and UCMC standards of accountability required to ensure the integrity of our research programs.

Researchers are expected to protect the rights, well-being, and personal privacy of research participants. All patient participation in clinical research

is voluntary. Patients participate only following a full explanation of the possible risks and consequences and after giving informed consent. A patient's refusal to participate in research projects in no way impacts the quality of care he or she receives.

#### **IV. UCMC's Expectations of Compliance Obligations**

The commitment to compliance applies to all personnel levels within UCMC and its affiliates. Accordingly, corporate officers, senior management, directors, managers, supervisors, physicians who are part of the medical enterprise, and all other employees are expected to comply with, and are expected to ensure that their subordinates adhere to, applicable standards, laws, and procedures. Discipline may be imposed for failing to detect a compliance violation, if the violation is later discovered and an individual covered by this policy could reasonably be expected to have detected the violation earlier, but failed to do so.

#### **V. Compliance Education**

Education is critical to the success of the Compliance Program. Every new employee will be introduced to the Compliance Program within the first 45 days of hire. This introduction takes place through New Employee Orientation and includes an overview of the Code of Conduct, HIPAA Privacy & Security, and the Compliance Program, more broadly. Additionally, residents/fellows, non-physician practitioners, faculty physicians, individuals who hold leadership roles, and employees involved in patient care, medical record documentation, or any aspects of the revenue cycle or financial operations of UCMC are required to participate in annual compliance training.

The Office of Corporate Compliance offers a variety of live sessions, external webinars, and online education options. Outside speakers may be invited to provide sessions covering the latest information on compliance issues within sections/departments or across the institution. These education options are publicized on the Office of Corporate Compliance website <http://compliance.bsd.uchicago.edu/>.

## VI. Conclusion

This Code of Conduct sets forth UCMC's policies and expectation about proper job-related conduct. UCMC cannot, however, anticipate every situation an employee or faculty member may face. Please use the Code of Conduct and affiliated policies to increase awareness in recognizing, understanding, and fulfilling your job responsibilities, as well as preventing and detecting compliance violations. For more detailed guidance, please review UCMC's policies and procedures, available on the Intranet at <http://home.uchospitals.edu/>. If further questions regarding compliance remain, please do not hesitate to contact the Office of Corporate Compliance at (773) 834-4733, or the Compliance Resource Line at (877) 440-5480 or internally at (773) 834-3222. There is no concern too small or unimportant regarding proper conduct.

## APPENDIX A

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### **IMPORTANT PHONE NUMBERS**

#### **Compliance Resource Line**

(773) 834-3222 or (877) 440-5480

#### **Office of Legal Affairs**

(773) 702-1057

#### **Krista Curell**

*Vice President of Accountable Care,  
Chief Compliance Officer*

(773) 702-9785

#### **Erik Decker**

*Chief Information Security and Privacy Officer*

(773) 834-5471

#### **Office Of Corporate Compliance**

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*Tracy Volel*

Associate Compliance Officer

(773) 834-4733

*Leslie Warren*

Associate Compliance Officer

(773) 834-2995

*Tomicia James-Miller*

Director, Compliance Audit Services

(773) 834-1143

*Tasha Osafo*

Director, Compliance Education, Risk and Data Services

(773) 834-3047

## APPENDIX B

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### UCMC MISSION STATEMENT

## Our Mission

Our mission is to provide superior health care in a compassionate manner, ever mindful of each patient's dignity and individuality.

To accomplish our mission, we call upon the skills and expertise of all of our medical professionals, who work together in collegiality to advance medical innovation, serve the health needs of the community, and further the knowledge of those dedicated to caring.

## Our Vision

On a foundation of mutual respect, we will work together to build the University of Chicago Medicine into one of the finest organizations in the country as measured by the quality of patient care, the satisfaction of patients and their families, and the level of pride among everyone who works here.

## Pride Values

The finest, most efficient care is best measured by those who proudly provide it. Those who hold fast to these five key values:

**Participation:** A spirit of teamwork and sharing

**Respect:** A consideration and appreciation for others

**Integrity:** Honesty in our words and actions

**Diversity:** Honoring the power of different backgrounds and perspective

**Excellence:** A commitment to do our best at all times

# APPENDIX C

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## PRIDE VALUES

The PRIDE Values outline how we expect members of the University of Chicago Medicine team to behave at work. It is critical that each individual holds him or herself, and their colleagues, accountable to living the PRIDE Values so that we may deliver the best experience possible to our patients, their families, and visitors.

Each value listed below has a clear, concise definition so that we can all meet those expectations, and make a difference every day.

### **PARTICIPATION**

P

Follows through on commitments, engages with others, offers new ideas to achieve objectives and advance the mission of the organization, works collaboratively with others, demonstrates teamwork and support of co-workers, takes initiative to act and get things done, performs at the highest level every day.

### **RESPECT**

R

Recognizes and appreciates the contributions of others, demonstrates professional behavior, and communicates responsibly to build trust in relationships, shows kindness and compassion to others, focuses on others and their needs.

### **INTEGRITY**

I

Instills trust and confidence in others and acts in a fair and ethical manner to uphold our tradition and invest in our future, respects others' privacy and maintains confidentiality, demonstrates commitment to the organization, takes pride in own work and the work of peers, supports the community.

### **DIVERSITY**

D

Supports an inclusive environment and embraces different backgrounds, perspectives, and customs, develops self-awareness to understand own worldview and addresses own assumptions and biases, understands the worldview of others and develops skills to meet others' cultural needs.

### **EXCELLENCE**

E

Creates ideal experiences and raises standards through personal development, investing in others and continuous improvement to achieve exceptional outcomes, identifies opportunities to make improvements, sets and follows high standards of service and care, participates in performance improvement activities, reduces non-value-add activities.



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