

UCLA HEALTH SYSTEM CODE OF CONDUCT

I. UCLA MEDICAL SCIENCE INTEGRITY AND ETHICS PROGRAM

UCLA Medical Sciences is committed to providing quality health care services, health professional training, and biomedical research in compliance with all applicable laws and regulations. At the same time, the University is expected to take responsibility for appropriate ethical and legal behavior in the work place.

This handbook has been prepared as part of UCLA Medical Sciences' Compliance Program ("The Integrity Program"), and is intended to provide guidance to all those who work in the Medical Sciences Enterprise about some basic "*rights and wrongs.*" While much of this information is self-evident to UCLA employees, it nevertheless serves a key function of tying adherence to the law with our every day conduct. To represent our program and our commitment toward excellence, our logo is the TORCH. The TORCH stands for Trust, Openness, Responsibility, Confidentiality and Honesty and represents the values of the program and organization, and our actions!

The scope of The Integrity Program of UCLA Medical Sciences includes the following sub-programs: HIPAA Privacy and Security, Home Health Compliance, EMTALA Compliance, Lab Compliance, Hospital Compliance, Clinical Research Compliance and Professional Billing Compliance. The Program supports our three hospitals, all outpatient areas, including clinics, the School of Medicine and the Faculty Practice Program. Each employee, faculty member and student shares in the responsibility for supporting The Integrity Program and carrying the TORCH for UCLA Medical Sciences!

Why Do We Have a Compliance or Integrity Program?

Health care has become more complex in recent years, with an increased emphasis on financial considerations. In addition, federal and State governments, have placed growing importance on preventing and detecting instances of fraud and abuse in violation of state and federal health care laws and regulations. The primary method of preventing health care fraud and abuse has been the creation of **compliance programs** at the corporate level as a method of self-policing by members of the health care sector.

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 healthcare but to further the fundamental mission of all healthcare entities, which is to provide quality healthcare 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. UCLA has taken up this mandate in part to serve as a role model for good corporate citizenship in health care in the 21st century. UCLA began its compliance program in 1997 with the creation of standard documentation rules for physician professional billing, along with a monitoring capability to insure that these rules are being adhered to throughout the healthcare enterprise. UCLA has expanded its compliance program to cover all components of the UCLA Medical Sciences enterprise.

Goals and Objectives of the UCLA Medical Sciences Integrity and Ethics Program

- Reduce UCLA Medical Sciences' risk of fraud, abuse and waste
- Prevent and detect misconduct and violations of the Compliance Program
- Educate UCLA Medical Sciences Employees about the Compliance Program and their responsibilities under the program
- Develop an ethical infrastructure to help guide staff and faculty behavior and activities on behalf of UCLA Medical Sciences

In a larger sense, the ultimate goal of the Program is to provide the means for making compliant, ethical behavior part of the standard operations of all parts of UCLA Medical Sciences. This is based on a belief that both “doing things right” and “doing the right thing” make good business sense.

The Purpose of the UCLA Medical Sciences Integrity and Ethics Program

The Program has been developed in the context of UCLA Medical Sciences' core mission, which is “to develop and maintain an environment in which the educational and scientific programs of the Schools of the UCLA Center for Health Sciences are integrated with exemplary patient care.”

The specific purposes of the Program are to:

1. Maintain and enhance quality of care;
2. Demonstrate sincere, ongoing efforts to comply with all applicable laws;
3. Revise and clarify current policies and procedures in order to enhance compliance;
4. Enhance communications with governmental entities with respect to compliance activities;
5. Empower all responsible parties to prevent, detect, and resolve conduct that does not conform with applicable laws, regulations and the Program; and
6. Establish mechanisms for employees to raise concerns about compliance issues and ensure that those concerns are appropriately addressed.

UCLA Medical Sciences Integrity and Ethics Program Structure

The Program covers the UCLA Medical Center, the David Geffen School of Medicine at UCLA, the Stewart and Lynda Resnick Neuropsychiatric Hospital at UCLA and the Semel Neuropsychiatric Institute, Santa Monica UCLA Medical Center, the UCLA Ambulatory Care Clinics and Primary Care Network (*collectively referred to in this handbook as the “UCLA Medical Sciences”*). The Program has been formally adopted by the clinical, academic, and administrative leadership of UCLA Medical Sciences as policy.

As part of the Program, the University has developed the Code of Conduct (“the Code”) to provide employees with a “compliance context” to their daily activities, as well as enable employees to recognize and respond appropriately to situations that may arise during the course of their duties.

A Chief Compliance & Privacy Officer (“CCO”) has been appointed by the Vice Chancellor and Dean to administer the Program, ensure that it is kept up to date, facilitate education of all employees about compliance issues and investigate compliance questions. Compliance Directors have been appointed to oversee Professional Compliance and Hospital System Compliance activities. The Compliance Directors are senior management personnel, and report to the CCO. An Enterprise Compliance Committee provides advice and counsel to the CCO and the Compliance Directors in their work.

Code of Conduct Handbook and Other Compliance Policies

This *Code of Conduct Handbook* provides corporate guidelines for compliance and ethical behavior by those covered under the Program (see below). Its publication is, however, neither a one-time event nor the only written materials or policies that will be developed on compliance. A number of Compliance policies have been developed relating to the organizational structure of the Compliance Program, Conflict of Interest, auditing and monitoring standards, HIPAA Privacy and Security, Home Health Compliance, EMTALA Compliance, Lab Compliance, Hospital Compliance, Clinical Research Compliance and Professional Billing Compliance policies. Additional detailed UCLA Medical Sciences policies will be developed in specific areas of clinical and academic operations, such as hospital finance, coding, and research. UCLA Medical Sciences Compliance policies can be found at <http://www.mednet.ucla.edu/Policies/policies.asp>. Supplemental materials and training will be provided throughout UCLA Medical Sciences as higher and more detailed levels of knowledge are developed. The evolving nature of our understanding of compliance issues and the broader implications of developing a framework for organizational ethics, in addition to changes in existing laws and regulations, will lead to the periodic renewal and revision of the Program. In order to be successful, the Program must be dynamic and responsive to the environment in which we work and live.

As part of the larger University of California community, UCLA Medical Sciences workforce members are also expected to follow the University’s Statement of Ethical Values that are listed in Appendix A. The University has also provided additional guidance in the form of the University’s Standards of Ethical Conduct, listed in Appendix B. These standards are consistent with the values and standards outlined in the UCLA Medical Sciences Compliance program.