

## **UCLA HEALTH SYSTEM CODE OF CONDUCT**

### **II. APPLICABILITY OF THE PROGRAM AND RESPONSIBLE PARTIES**

The Program applies to all members of the UCLA Medical Sciences workforce and includes administrators, directors, managers, faculty physicians, health care professionals and staff. All University personnel are required to follow UCLA Medical Sciences' Compliance policies, relevant department, division, Hospital System, School, and University policies, and all applicable government laws and regulations. University Personnel must take responsibility for awareness of compliance policies and procedures relevant to their respective job descriptions and areas of responsibility.

When a UCLA Medical Sciences employee works in an affiliated institution or other institutions in which the University has a contract or affiliation agreement, the employee should continue to follow the ethical and legal standards established by the Program, as well as those of the affiliated institution's compliance program, if such a program exists.

In the case of an outside entity doing business with the University through a contractual agreement, the University employee responsible for negotiation and management of the contract shall provide a copy of the University's Program to the vendor. Vendors must show evidence of an existing compliance program, or declare a willingness to abide by the University's Program.

#### **UCLA Medical Sciences Integrity Program Elements**

The Program encompasses the following elements to enable the primary goal of detection and prevention of potential violations of the Program and applicable federal/state laws and regulations to be realized:

- Compliance standards and policies
- Training to ensure that all Responsible Parties understand applicable laws, regulations and interpretations, as well as potential sanctions and penalties for non-compliance
- Methods by which compliance with standards and policies are monitored
- Systems for communicating changes to compliance standards and policies to Responsible Parties
- System for internal reporting of suspected violations and compliance issues
- Organizational structure for oversight of the program
- Mechanisms to correct identified issues

#### **Professional Fee Billing Compliance Program**

The David Geffen School of Medicine at UCLA Professional Services Compliance Program, implemented in July 1997, is designed to reduce the potential for mistakes to occur in documenting or billing for professional (i.e., physician) services. This program establishes the policy that all professional services rendered by UCLA Medical Sciences physicians and providers shall be provided and documented in accordance with federal and state laws, regulations and policies. Further, the UCLA policy prohibits the

submission of any bill or claim by or on behalf of any faculty member for services participating in University compensation plan that fail to satisfy applicable requirements for payment by government and private payers.

The UCLA Professional Services Compliance Program policies and procedures apply to all University personnel involved in the provision of, and documentation or billing for professional medical and/or health care services.

### **Medical Sciences Compliance Program**

The Medical Sciences Compliance Program includes the Hospital System Program and is designed to incorporate compliance activities occurring in multiple hospital system departments into a comprehensive integrated program in conjunction with the School of Medicine and Faculty Practice Program. The program is designed to reduce the potential for fraud and abuse in hospital coding and billing programs, along with ensuring compliance with multiple other regulatory requirements that impact hospital and hospital based licensed areas including compliance with federal privacy and security regulations, EMTALA regulations, and other regulatory mandates. The program integrates compliance activities in specialized areas including laboratory and pathology, home health, health information management, reimbursement, coding and billing.

The Program policies and procedures apply to all UCLA Medical Sciences Hospitals, including its ambulatory clinics.

### **Compliance and Ethics Requirements for the UCLA Medical Sciences**

As part of UCLA Medical Sciences, members of the UCLA Hospital System have the additional obligation to deal effectively with the ethical dimensions of health care in a rapidly changing environment. The principal hospital accrediting body, the Joint Commission on Accreditation of Medical Sciences Organizations (“JCAHO”) requires accredited institutions to establish and abide by certain “organizational ethics” standards. A key standard requires each accredited health care organization to operate “according to a code of ethical behavior” in order to preserve and enhance patients’ rights. The Program standards form the core of each UCLA hospital’s organizational ethics focus, emphasizing the need for an ethical environment to promote and uphold patient rights.

### **Research Compliance Activities**

Individuals engaged in research activities involving human subjects are subject to requirements promulgated by the University Human Subjects Protection Committee (“HPSC”). The UCLA Office for Protection of Research Subjects has created a comprehensive document entitled the “**Investigators Manual for the Protection of Human Subjects.**” This document should serve as the first point of reference for individuals with questions concerning research compliance activities.