

# CODE OF CONDUCT



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# WELCOME LETTER

## DEAR UCLA HEALTH COLLEAGUES,

Welcome to UCLA Health. We are committed to working together to continuously improve our organization and demonstrate our mission, vision and values in all that we do. Our mission is to deliver leading-edge patient care, research, education and community engagement. We value and appreciate the collective work of our staff, faculty, researchers, educators and trainees who work here.

The following Code of Conduct is designed to help guide the path for your everyday decision-making. As a supplement to the [University of California's Standards of Ethical Conduct](#), these guidelines will provide you with tools and resources to navigate the specific rules and standards required in health care.

Thank you for carefully reviewing these materials and adhering to the Code of Conduct requirements.

We appreciate the continued teamwork in advancing UCLA Health and meeting our regulatory and compliance standards.

Sincerely,

### [John C. Mazziotta, MD, PhD](#)

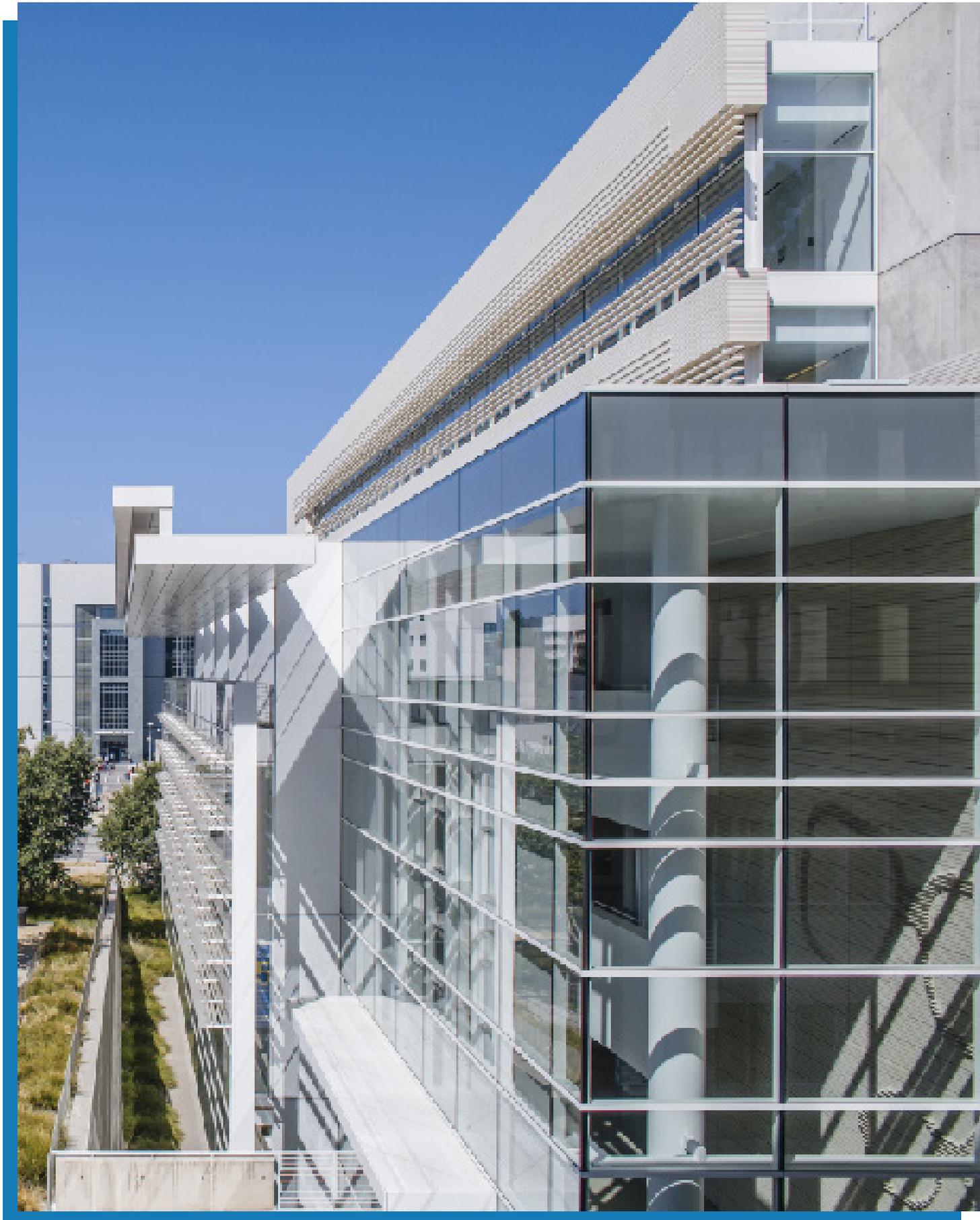
Vice Chancellor, UCLA Health Sciences  
CEO, UCLA Health

### [Johnese Spisso, MPA](#)

President, UCLA Health  
CEO, UCLA Hospital System  
Associate Vice Chancellor, UCLA Health Sciences

### [Steven M. Dubinett, MD](#)

Interim Dean, David Geffen School of Medicine at UCLA



# OUR COMMITMENT TO SERVICE EXCELLENCE

At UCLA Health, we are committed to providing a compassionate, collaborative and professional environment of care for our patients, families and each other. Together, the [CICARE Service Excellence Standards](#), the [We Listen We Care](#) commitments to patients, and the David Geffen School of Medicine (DGSOM) at serve as a guide in our everyday interactions and behaviors at, and on behalf of, UCLA Health.





# WHO WE ARE

## We are healers

We heal humankind, one patient at a time.

We are UCLA Health: a devoted team of internationally regarded professionals. We are dedicated to the discovery of new medical frontiers, to the teaching of future generations, and to delivering the finest, evidence-based care.

## We are innovative

As an academic health system, we provide our communities with access to the latest technologies, innovative therapies and groundbreaking clinical trials. Our commitment to patient care, research, education and community engagement means that our patients benefit from the latest diagnostic and treatment techniques in virtually every area of medicine.





## **We are diverse**

UCLA Health is committed to creating an inclusive and diverse work and learning environment aimed at promoting personal growth and education, fostering unique talents, and serving the diverse health care needs of our communities across the globe.

## **We are inclusive**

We strive to make a positive impact on each other, our patients and our community by creating an environment where everyone feels comfortable, welcome, included and heard. We treat each other with dignity and respect, and hold ourselves accountable for our actions. We do not tolerate harassment or discrimination against any individual for any reason.

UCLA Health is committed to providing an equal-opportunity work environment, free of unlawful behavior and harassment. Discrimination is prohibited in any work-related decision or hiring practice on the basis of race, color, national origin, religion, gender, physical or mental ability, medical condition, marital status, age, sexual orientation, citizenship or status as a veteran. We comply with non-discrimination laws, regulations and policies.



## We are a safe and fair workplace

### OUR CULTURE IS RESPECTFUL

We foster a culture where everyone is treated with fairness, dignity and respect. We define violence as any actual or attempted aggressive or threatening actions or comments intended to cause or create the potential for psychological and/or physical harm or injury to others. Violence of any kind, including threatening and/or aggressive behavior, is strictly prohibited. We are committed to providing a safe and healthy environment for all students, trainees and workforce members.

### → REMEMBER

#### What does aggressive/threatening behavior include?

- Insulting, hurtful, disrespectful, negative, degrading or rude comments about others
- Condescending language or demeaning comments
- Threatening, intimidating, aggressive or abusive language
- Passive-aggressive or threatening behavior which can be verbal or nonverbal
- Reluctance to answer questions, return calls or follow policies and procedures



## TITLE IX OFFICE/SEXUAL VIOLENCE, HARASSMENT AND OTHER FORMS OF PROHIBITED CONDUCT

UCLA Health has no tolerance for sexual misconduct and other types of discrimination based on gender, sexual orientation, gender expression and pregnancy. We are committed to providing all workforce members with an environment free of harassment, intimidation and exploitation. All workforce members must complete sexual violence and sexual harassment training bi-annually and are expected to report any suspicions of such conduct. Title IX prohibits discrimination based on sex or gender in education programs or activities receiving federal financial assistance. Report any discrimination allegations based on gender, sexual orientation, gender expression and pregnancy, including sexual harassment and sexual violence, to the Title IX Office.

If you would like confidential help, contact your local CARE Advocate or Employee Assistance Program. We created the advocate office to provide survivors of sexual violence with emotional support and assistance.

***Q: What should I do if I witness a violation of UCLA Health's principles or policies and I'm worried about retaliation if I report?***

A: We believe in creating and promoting an environment where reporting any known problems, concerns, mistakes and/or other issues can be shared without fear of retaliation. We view these instances as opportunities to learn and encourage team members to report them through the Compliance Hotline, 800-403-4744, via email ([CompOffice@mednet.ucla.edu](mailto:CompOffice@mednet.ucla.edu)), or on the [Compliance Online Reporting page](#). Additional [reporting resources](#) are available to DGSOM employees.

## KEEPING YOU SAFE

UCLA Health is committed to promoting the occupational health of its students, trainees and workforce by providing necessary and required protective measures. We always prioritize the safety of our patients, students, trainees, workforce members and visitors. In order to do so, we require all members to abide by our policies related to safe use of workforce equipment, disposal of hazardous materials and infection prevention. All workforce members, both clinical and non-clinical, are required to complete an annual training which includes information regarding patient safety, workplace safety and handling of hazardous chemicals. We expect all workplace injuries and unsafe or hazardous work conditions to be reported immediately. [A Safer U Toolkit](#) is available to support the well-being and safety of our workforce members.

## We Are a Tobacco-, Alcohol- and Drug-Free Workplace

When reporting to your position at UCLA Health, you must do so free from the effects of alcohol and drugs. We ensure the greatest well-being of our community by promoting a safe and fair learning environment and workplace for our students, trainees and workforce members, and ensuring the safety of our patients, families and visitors.

In an effort to promote healthy living, UCLA's campus is a smoke- and tobacco-free environment. This includes all indoor and outdoor areas of our hospitals and campuses. Use of tobacco products including, but not limited to, vaping, hookah use and smoking cannabis is strictly prohibited. The use, possession and sale of cannabis in any form on all university property is prohibited. Violating the university's policies may result in discipline, up to and including dismissal, or corrective action which may include required participation in a treatment program.

In support of this initiative, some UCLA Health professionals have pledged to be UCLA Smoke Free Champions. They serve as advocates to assist patients, their families and our workforce with the transition to a smoke-free environment.



## We are sustained by three pillars

UCLA Health participates actively in the UCLA Sustainability Program. We comply with applicable environmental laws and regulations and aim to sustain the earth's natural resources that are essential to protecting human health and all forms of life. Our sustainability program aims to strengthen the environment and improve the health of our communities by minimizing our environmental footprint.



## We are prepared for emergency

The Office of Emergency Preparedness is responsible for developing plans for external emergency and disaster response. This is done in support of the local and regional patient population.

It is important that you follow instructions and familiarize yourself with safety procedures and emergency plans for your area.

The Office of Emergency Preparedness offers Community Emergency Response Team Training (CERT), which equips workforce members with basic lifesaving, rescuer-safety and response-organization skills.

### EMERGENCY CONTACT LINES

#### Outside Hospital:

310-267-7100 (Westwood)  
424-259-9100 (Santa Monica)

#### In Hospital:

Extension: 77100 (Westwood)  
Extension: 99100 (Santa Monica)

#### Non-Emergency contact lines:

310-825-1491 (Westwood)  
310-458-8491 (Santa Monica)

For more information, please visit the [incident reporting page](#).

# THE CODE OF CONDUCT

## How to live our values

Our mission, vision and values are brought to life through our team members who champion our principles every day. Each of us has a responsibility to follow this Code of Conduct.

At UCLA Health, we constantly seek out diverse voices to ensure our high standards are met. It's our responsibility to raise questions and help solve problems. Our trainees and workforce members are required to abide by applicable Health System, Campus and University of California Office of the President policies, as well as applicable laws and regulations.





## How to model ethical behavior

We expect all members of our community to model our values in all interactions.

We are expected to model ethical behavior and hold each other to the same standard. Our leaders are committed to creating an environment where it is safe to ask questions and raise concerns without fear of retaliation. If you are unsure whether certain acts are legal or ethical, ask for guidance from your direct supervisor, department leaders or the Office of Compliance Services (OCS).

### How to treat patients with respect

The following principles are intended to guide clinical and patient care support staff in our everyday interactions, observations and behaviors at, and on behalf of, UCLA Health.

#### PATIENT EXPERIENCE

UCLA Health is committed to delivering safe, high-quality, patient-centered experiences across the patient journey by empowered and resilient caregivers.

#### OUR MISSION

is to deliver leading-edge patient care, research, education and community engagement.

#### OUR VISION

is to heal humankind, one patient at a time, by improving health, alleviating suffering and delivering acts of kindness.

#### AND EVERY TIME WE ENGAGE WITH PATIENTS AND FAMILIES, WE PROVIDE **CICARE**:

- **Connect** with the patient, family and colleagues by addressing them by their preferred names and pronouns.
- **Introduce** yourself and your role.
- **Communicate** what you are about to do, how long it will take, and how it will impact the patient, family or colleague.
- **Ask** and anticipate questions from the patient, family and colleagues.

- **Respond** with immediacy to questions and requests from the patient, family and colleagues.
- **Exit** every encounter with empathy and share what will come next.

Our collaborative contribution is reflected in our patient and family experience. Each of our individual actions impacts our patients' overall experiences at UCLA Health. Your individual capacity reflects on the overall rating of the health care system. Whether that means welcoming someone to UCLA Health, preparing a meal, transporting a patient, keeping a patient area clean or providing clinical care — we are all working together to act on our vision by improving health, alleviating suffering and delivering acts of kindness.

#### → **KEY TAKEAWAYS:**

- Connect with the people around you, including: colleagues, patients and families.
- Look for ways to help your colleagues and all those we serve.
- Do not take your breaks in patient waiting areas.
- Do not take a nap in public spaces inside the hospital.
- Wear your badge above your waist.
- Represent UCLA Health with professionalism and kindness.
- Appreciate the gift of health.





## PATIENT SAFETY

We are committed to providing patients a safe environment to improve their health. We have policies and trainings related to safety in diverse areas of health care, providing us with appropriate standards and guidelines. We all play an essential role in this education; together we can identify gaps, potential errors and near misses.

Disclosure and transparency regarding errors and unexpected outcomes are vital components of change and education. UCLA Health is committed to fostering a culture of open communication, wherein everyone feels comfortable reporting errors without fear of consequence or retaliation.

## QUALITY OF CARE

At UCLA Health, we know that each patient has individual needs. It's our job to make safe, smart, timely, efficient, and medically appropriate and necessary decisions that reflect personalized care. We strive to involve our patients, their families and caregivers in making difficult medical decisions, and offer alternative treatment options. Each patient has the right to make choices about their care, including the choice to forgo treatment. We provide culturally sensitive, equitable, quality care to every patient — regardless of their background or their ability to pay. We base medical recommendations and decisions on scientific evidence, leading to the patient's health care goals. Our primary ethical obligation is to ensure the well-being of our patients. We are also obligated to promote public health and equitable access to care. Thus, we are prudent stewards of the shared societal resources entrusted to health care providers. Managing health care resources responsibly for the benefit of all patients is compatible with our primary obligation to serve the interests of individual patients.

## THE CODE OF CONDUCT

### CONTROLLED SUBSTANCES AND OTHER MEDICATIONS

UCLA Health complies with all regulatory requirements regarding the safe administration and management of medications to patients. This includes preventing, detecting and responding quickly to suspected mismanagement or diversion of drugs.

#### → REMEMBER

- It is a crime to participate in drug diversion.
- If you are working in an area that has access to controlled substances (narcotics), know the signs of abuse, addiction and diversion.
- Follow policies and procedures regarding the correct handling of drugs and biologics, including controlled substances.
- UCLA Health has systems in place to monitor and detect drug diversion in our care settings.
- You must immediately bring your concerns to the attention of your leader, Human Resources, the organization's safety teams, and the Office of Compliance Services if you suspect, or are concerned, that someone you work with may be diverting or mishandling drugs, or working under the influence.

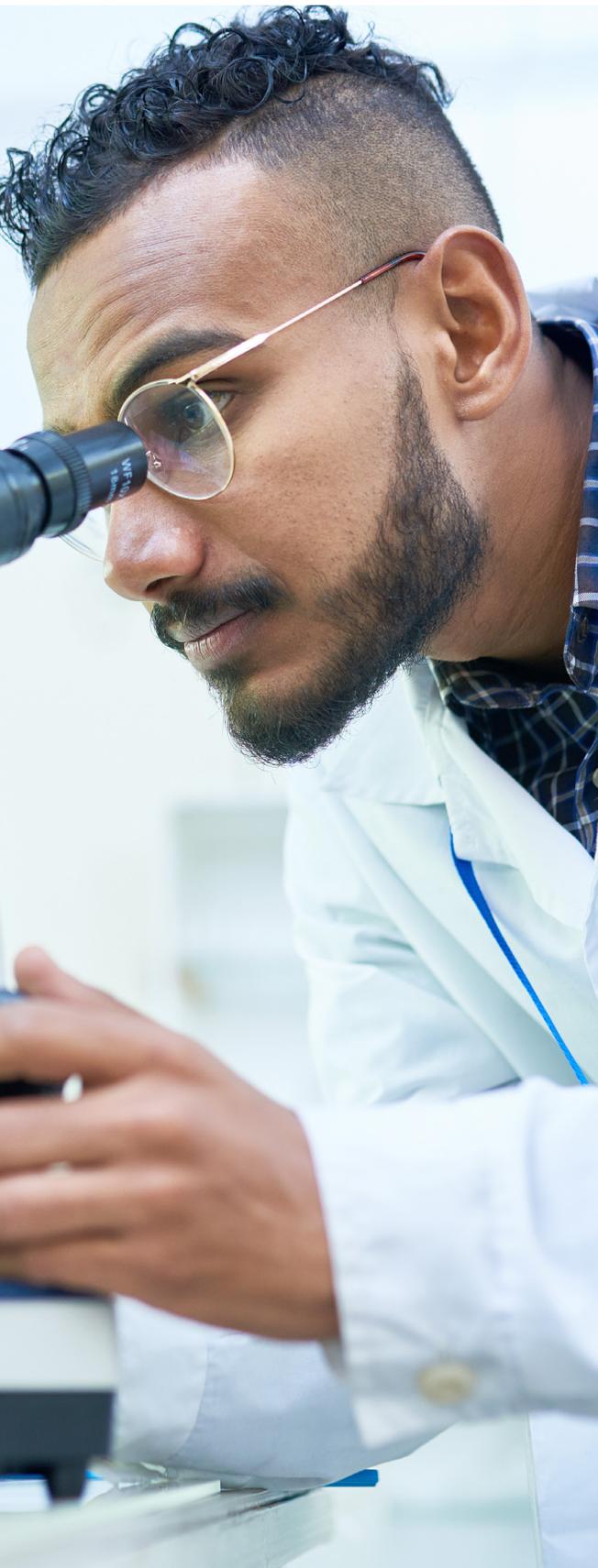
### EMERGENCY TREATMENT

We abide by the requirements of the Emergency Medical Treatment and Labor Act (EMTALA). We have a duty to treat and stabilize patients under emergency conditions, regardless of the patient's ability to pay or their insurance status. We are committed to ensuring that, prior to transferring patients, the medical advantages outweigh the risks. We transfer patients only when we do not have the capacity or capability to ensure the patient's medical needs are met. Patients are transferred once they have been stabilized and accepted by an alternate facility with the ability to meet the patient's medical needs.

### PARTICIPATING FEDERAL PROGRAMS

UCLA Health is committed to following the requirements and regulations set by state and federal health care programs. We provide care to private insurance beneficiaries, Medicare, Medi-Cal, TRICARE and other government health care program beneficiaries. Each of us plays a part in providing necessary, quality care that is coded and billed correctly.





## How to conduct research ethically

At the David Geffen School of Medicine at UCLA, research and education are vital parts of medicine and improving health. Faculty, scientists, educators, staff and trainees all play essential roles in our organization.

We conduct research ethically to advance the healing of humankind and improve our patients' outcomes. We do so in compliance with the regulations and policies set forth by UCLA Health and sponsors, as well as state and federal laws and statutes. As an academic health system, UCLA Health expects that students follow all policies and ethical behaviors while conducting research and providing patient care.

Patients place their trust in us when they participate in clinical research. We therefore have an extra responsibility to preserve the trust of our patients as well as the public in all of our research activities. We are committed to helping patients make informed decisions about their care by informing all patients who are considering participation in clinical research about the risks and benefits of their participation, as well as alternative treatment options. We make every effort to protect our patients' rights, well-being and personal privacy. UCLA Health does not tolerate research misconduct, including but not limited to plagiarism, misuse of funds and billing fraud. Clinical research must document all treatment and care provided to patients clearly and accurately.

### → REMEMBER

- Utilize funds intended for research activities appropriately.
- Do not purchase clinical research equipment from vendors with whom you have a personal or financial relationship.
- Protect research participants' privacy as you would any patient.
- Disclose any conflicts of interest including in the conduct of research.





Taking action today  
to build an equitable  
tomorrow

## How to protect sensitive and confidential information

We are committed to respecting and protecting the privacy and confidentiality of the personal and health information of all students, trainees, workforce members and patients. We are committed to following the Health Insurance Portability and Accountability Act (HIPAA), Health Information Technology for Economic and Clinical Health (HITECH) Act, state privacy laws, and all applicable UCLA Health, UCLA and University of California policies.

Protected Health Information (PHI) is any individually identifiable health information, in any form, including but not limited to, media, whether electronic, paper, or oral. “Individually identifiable” refers to health or medical information that contains any element of personal identifying information that would allow identification of the individual. Examples of PHI include medical information, patient billing and health insurance information that applies to a patient’s past, current or future physical or mental health, or treatment.

Electronic Protected Health Information (ePHI) is PHI that is transmitted by electronic media or is maintained in electronic media such as a computer, CD, disk, magnetic tape or other media. This includes all data that may be transmitted over, or stored on, the internet.



### WHAT IS INDIVIDUALLY IDENTIFIABLE HEALTH INFORMATION?



Includes but is not limited to a patient’s:

- Name
- Address
- Electronic mail address
- Telephone number
- Driver’s license number
- Social Security Number
- Full face photos or other identifying images

HIPAA applies to all health care information maintained by health care providers – or covered entities – such as UCLA Health. The HIPAA Privacy rule applies to all medical records and potentially identifying information in all forms, including electronic, paper and verbal communication. This includes any information that is created or received by a health care provider that identifies (or could reasonably be used to identify) an individual, related to that individual’s past, present or future health care, physical or mental health or condition, or payment for health care.



## SHARING PATIENT INFORMATION

As a health care organization, we abide by the “minimum necessary” standard when using and disclosing patients’ protected health information.

What is the “minimum necessary” standard?

The “minimum necessary” standard means that our goal is to provide the least amount of patient information necessary to accomplish a job-related purpose. This would include tasks and duties related to payment, treatment or the operational needs of the organization. We only share patient information with authorized individuals who “need to know.” We never discuss confidential patient information with unauthorized personnel,

family members, friends, colleagues, suppliers or others. For the highest-quality patient protection, we may also require UCLA Health contractors, business partners and other parties to sign agreements to protect confidential patient information.

UCLA Health also has policies we must follow regarding sharing information with the media and the public. The release of personal health information to the media or the public is not permissible unless allowed by HIPAA or California law. All media inquiries must be referred to the [UCLA Health Media Relations Office](#).

*Q: : Can I share sentimental or interesting stories of patients with my friends and family if I omit the patients’ names?*

A: No. You may be sharing information that could potentially identify the patient. You should not discuss with others specific scenarios or interactions you encounter with patients or their families.

## THE CODE OF CONDUCT

### → REMEMBER

- Only access patient information necessary for job-related purposes.
- Do not access your own medical record. Use the patient portal, [myUCLAhealth](#), to access your information.
- Do not access your fellow employees' records for any reason, including looking up phone numbers, birthdays or addresses.
- Do not access your family members' or friends' records for any reason. If they are seeking medical records, they must request them through [UCLA Health's Health Information Management Services](#).
- Encrypt all devices used for UCLA business to avoid unauthorized access.
- Do not save or download protected information to a personal device or email it to your personal email address.
- Lock your computer when you step away to avoid unauthorized access.
- Always protect the privacy of our patients, employees and research participants.

*Please note: Patients have a right to inspect and receive copies of their medical records and other protected health information, unless otherwise restricted by law.*

### SHARING UCLA HEALTH RESTRICTED INFORMATION

We do not share proprietary, confidential or business information without proper authorization. In particular, we cannot share such information with non-UCLA Health personnel, including business and family acquaintances, customers, suppliers, corporations, nonprofit entities or others.

If you are unsure of whether sharing certain information, patient or otherwise, is appropriate, please contact the Office of Compliance Services.

### → REMEMBER

Restricted Information may include:

- Passwords
- Patient health or identifiable clinical information
- Cost and financial information
- Social Security Numbers
- Student information
- Intellectual property items and materials
- Employee information

## INFORMATION SECURITY

We protect information through security measures that maintain confidentiality, integrity and appropriate availability of data. This includes protecting patients, research participants, confidential business information, students, trainees and workforce members' personal information.

### → REMEMBER



Do not share your password with anyone, and always click “no” when websites or apps ask to remember your password.



Use encrypted and secure devices when conducting UCLA business. This includes mobile devices.



Do not open emails with attachments and/or links from an unknown sender. Attackers can send “phishing” emails which impersonate trusted people or companies to try to get your protected information, such as passwords. Forward any suspicious emails, especially emails you suspect may be phishing emails, to [DangerousEmail@mednet.ucla.edu](mailto:DangerousEmail@mednet.ucla.edu). Report the loss or theft of any devices immediately to your department administrator and the Office of Compliance Services ([CompOffice@mednet.ucla.edu](mailto:CompOffice@mednet.ucla.edu)).



## How to Represent UCLA Health

### **SOCIAL MEDIA**

What we post on social media matters. Do not share patient information in public forums. This includes public websites and blogs, and personal social media accounts (Facebook, Twitter, Snapchat, Instagram, LinkedIn, etc.). Do not share stories and photos about a patient, even if the patient is not identified or the account is private.

Be careful and aware of how you share or post information online and on social media. If you express a personal opinion on your personal social media posts, you should do so as an individual and not as a UCLA Health workforce member.

### **BRANDED MATERIALS**

The Regents of the University of California own the UCLA Health brand and iconic images. Use or re-use of the brand or images must be appropriate and protective of the intrinsic value of the UCLA Health name and trademarked logos. You must receive [permission](#) to use the UCLA Health name, trademark or logo.

### **MEDIA INQUIRIES**

Please direct all media or communications inquiries, including but not limited to mail, email, voicemail and social media, to UCLA Health Media Relations ([uclahealthnews@mednet.ucla.edu](mailto:uclahealthnews@mednet.ucla.edu)) for review. Only authorized officials should provide response to media inquiries or put out press releases and/or official statements on behalf of the organization.

### **GOVERNMENT INVESTIGATIONS**

We believe in full cooperation with government inquiries, investigations and legal proceedings. These information requests can come in the form of a subpoena, summons or warrant. Authorized individuals must respond to these requests. We never destroy, alter or change records requested by or related to a governmental or other type of investigation. If you receive a request from a government agency, make sure to immediately tell your supervisor. The UCLA Health Office of Compliance Services and the UCLA Health Office of Legal Affairs will review business-related requests before responding to ensure they are handled appropriately.





## How to Conduct Business Fairly and Ethically

### CONTRACT NEGOTIATIONS

We believe in handling all contracting activities with fairness and transparency. If you are involved in contract negotiations on behalf of UCLA Health, you must act ethically and professionally. You must disclose any actual or potential conflicts of interest prior to the start of any contract negotiations. Individuals who have a conflict of interest must recuse themselves from the negotiation process and allow other individuals to make decisions on behalf of the organization.

## PROCUREMENT AND PURCHASING

We are committed to maintaining the highest level of integrity and professionalism in all supply chain-related activities, including procurement and purchasing. Workforce members involved in these activities are expected to conduct themselves with integrity and do their due diligence when dealing with outside organizations, vendors, suppliers and other stakeholders.

All confidential information must be protected while maintaining an appropriate level of accountability and transparency with key stakeholders.

Workforce members involved in these activities must ensure they do not engage in any activities or behave in a way that could create a conflict of interest or appearance thereof. If you are not sure if engaging in certain activities constitutes a conflict of interest, please contact the Office of Compliance Services.

### → REMEMBER

- Does this align with UCLA Health's mission, vision and values?
- Does this align with my professional responsibilities and/or duties?
- Is this fair for all stakeholders involved?
- How will this be perceived by others? How will this reflect on the organization?
- Is this being conducted with full transparency and honesty?
- Is this legal and ethical?

## How to manage potential conflicts

### CONFLICTS OF INTEREST AND THE RESPONSIBILITY TO REPORT

Our values are a vital part of how we conduct ourselves. We must conduct our business with absolute integrity.

It is important that we do not allow outside influence to interfere with our work. An example of a conflict of interest could involve a friend or family member gaining an advantage from a decision you make in your official role at UCLA Health. This can involve a financial or other personal interest that does not align with your professional responsibilities toward the organization. In short: outside professional activities and employment must not interfere with a workforce member's professional commitment to the organization.

In order to protect yourself and the organization from conflicts of interest, or even the perception thereof, you should always be objective and avoid any personal connections to you, your family members or friends when making business decisions, arrangements or relationships, conducting research, or dealing with vendors, patients and their families, our community and our customers.

UCLA Health workforce members are expected to disclose potential conflicts of interest to their supervisor and the Office of Compliance Services for review prior to making any contracting decisions. If a conflict arises, you should immediately disclose it and excuse yourself from the decision-making process.

### → REMEMBER

#### Examples of Potential Conflicts of Interest:

- Working for, or having financial interest in, another entity, such as a competing organization. (This also applies to your close family members – including your spouse, parents and children.)
- Receiving funds for honoraria or for serving as a director, consultant, partner or employee of an organization doing business with, or wishing to do business with, UCLA Health.
- Purchasing or leasing real estate that may increase in value based on knowledge that UCLA Health may have an interest in the property.
- Receiving special treatment from third parties doing business with UCLA Health.
- Receiving funding for research or a product owned, manufactured or distributed by a company in which you have a financial interest or from which you receive compensation.
- Participating in any other activity where a personal interest or benefit conflicts or interferes with your duties at UCLA Health.

### CONFLICTS OF COMMITMENT

UCLA Health workforce members must be aware of policies regarding conflicts of commitment and outside activities. These policies provide guidelines to ensure that there are no unnecessary limitations to engaging in outside activities, while avoiding conflicts of commitment. These policies also indicate what activities must be disclosed to the University, require prior approval, and/or must be disclosed on an annual basis. There are maximum thresholds placed on time commitments and earnings resulting from outside activities.

To avoid any conflicts of commitment, prioritization of time and efforts must be given to professional appointments by the University of California and toward organizational responsibilities. UCLA Health recognizes that participation in outside professional activities can have personal and professional value. Although this is true, it can also cause real or apparent conflicts of commitment. As such, outside professional activities must not interfere with professional obligations to the University.





## VENDOR RELATIONS

Health care vendors are companies that produce or market drugs, devices, nutritional products or other medical products and services. While vendor representatives may play an important role in patient care, all students, trainees, workforce members and departments engaging with vendors for educational, research, consulting or patient care purposes, should be aware of our policies. They define vendor expectations and reporting obligations. We must avoid all activities and relationships that could influence or bias our judgment and decision-making in the workplace. All vendor representatives visiting UCLA Health facilities must follow our policies and procedures.

*Q: I have a friend who sells medical devices. I am not currently using any of his equipment, but I would like to invite him to attend rounds and meet some of my patients. Is this OK?*

*A: No. Vendors can't enter patient care areas unless they are providing health care support or servicing equipment.*

### GIFTS & ENTERTAINMENT

We must behave with high ethical standards during all relations, actions and transactions we complete on behalf of the organization. To avoid favoritism, or even the appearance of favoritism, we must be careful about giving or accepting personal gifts from those doing business, or seeking to do business, with UCLA Health.

We must avoid any situation where something of value is offered or provided that may appear to influence our decisions or provision of patient care.

**Gifts from Patients/Family Members:** You may not accept or solicit personal gifts of cash, cash equivalents, or otherwise, from patients or patient families. If someone offers you a cash gift, graciously advise them to make a donation to UCLA Health instead. The UCLA Health System Gift Administrator will facilitate these donations, which are processed by the Medical Science Development Office – in cooperation with Gift Services and the benefiting department – to ensure all rules are followed and that the credit for the gift goes to the right people.





## WHAT IS A GIFT OF CASH?

Gifts of cash include currency, coins, checks, money orders or bank drafts.

## WHAT CONSTITUTES A GIFT?

A gift can be any item or service intended for your personal use or entertainment. It is any object or service of value for which the recipient does not provide an equal or greater object or service in return, subject to certain exceptions. Meals and entertainment are considered a form of gift.

## ANTI-KICKBACK LAWS

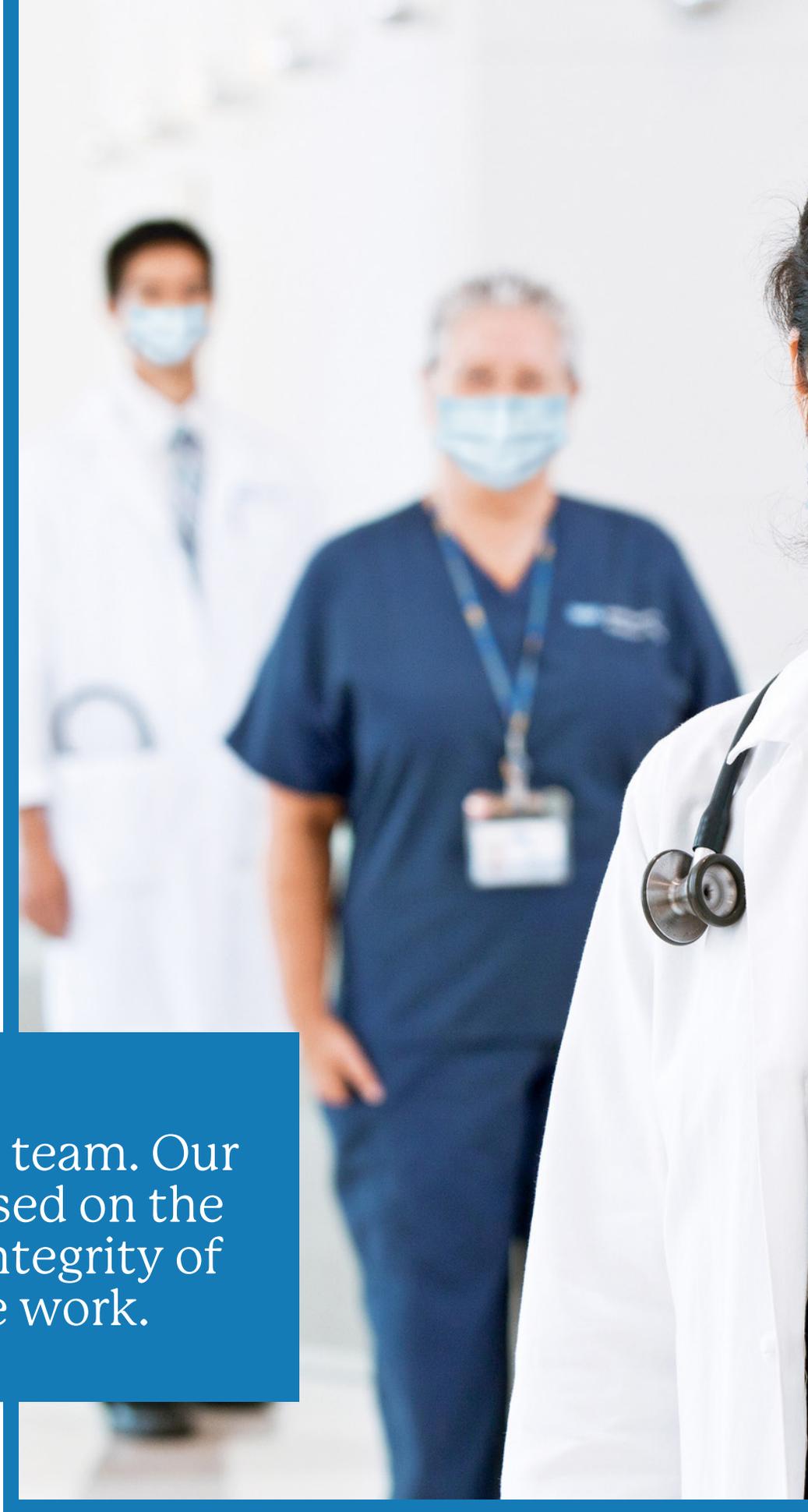
It is important that patients trust that, when we suggest treatment and other services, our recommendations are based on their needs – not our personal benefit. We follow all laws and referral practices by making sure patients receive services appropriate for their care.

The federal Anti-Kickback Law is a health care statute prohibiting individuals and organizations from the exchange of anything of value, in cash or in kind, in return for referrals or to induce referrals for services that are payable by Medicare, Medi-Cal, or any other state- or federally funded program.

In addition, the California Anti-Kickback Statute prohibits individuals and organizations from the exchange of any form of remuneration in return for referrals or inducement of referrals to UCLA Health, regardless of who the payer of services is. If a transaction happens for the sole purpose of patient referrals or the inducement of referrals, it is a violation of the Anti-Kickback Statute.

## → REMEMBER

- Do not solicit, accept or offer anything of value in exchange for patient referrals.
- Do not refer patients to other providers or facilities with which you or your family have a financial relationship or personal interest in.
- Do not offer special benefits or incentives to patients unless those arrangements meet very specific criteria approved in advance by appropriate departments.



We work as a team. Our success is based on the quality and integrity of our collective work.



## THE CODE OF CONDUCT

### FRAUD, WASTE AND ABUSE

We are committed to reducing fraud, waste and abuse through our compliance program and other institutional policies. As an academic health system, we must abide by relevant federal and state laws, some of which are discussed in this section. All workforce members must demonstrate high ethical standards in their everyday interactions and drive toward the organization's goals, in order to prevent instances of fraud, waste and abuse.

### USE OF UNIVERSITY AND HEALTH SYSTEM RESOURCES

University and/or Health System resources may only be used to conduct activities on behalf of the organization in support of our mission, vision and values.

Use of any resources for personal or private gain is prohibited, except in limited circumstances permitted by existing policies. Workforce members are expected to treat the University and Health System property appropriately and with care. Property includes but is not limited to:

- Cash and other assets, whether tangible or intangible; real or personal property
- Receivables and other rights or claims against third parties
- Intellectual property rights and information technology infrastructure

- Efforts of workforce members and of any third parties billing the organization for effort
- Facilities and the rights to use the organization's facilities
- Name and branding
- Records, including student, workforce and patient records

### POLITICAL ACTIVITIES

As a not-for-profit organization, we do not engage in political lobbying activities. If you choose to advocate for, or support, candidates for political office, political parties, political organizations, or political action committees, you must do so as an individual, not as an agent/representative of UCLA Health. You must engage in such political activities during your own time, and fund such activities through your own personal expense. Discrimination against others with differing political views is strictly prohibited.

#### → REMEMBER

- Do not perform political activities using the organization's resources, including time and equipment.
- Do not speak on behalf of



UCLA Health when engaging in political activities.

- Do not use UCLA Health's name, logos or your UCLA Health employment title on any written materials showing your individual or group support for political candidates or political causes.

### ANTITRUST LAWS

UCLA Health values fair competition in line with state and federal laws. Antitrust laws are in place to promote fair competition by encouraging market forces and discouraging price fixing. UCLA Health does not contract with any entity or individual listed by state or federal agencies as excluded or ineligible for participation in federally funded health care programs. As a member of UCLA Health, you should not engage in activities or negotiations that may violate antitrust laws by obstructing fair competition, including but not limited to:

- Denying staff privileges when there is no associated academic programming decision.



- Sharing pricing and other proprietary information not available to the public.
- Artificially setting prices or salaries.
- Disclosing to a competitor information regarding prices charged for services, costs of supplies, equipment and goods.

We are committed to running a fair and honest business. When representing yourself or UCLA Health, you should uphold our mission, vision and values.

### **FALSE CLAIMS ACT**

UCLA Health receives funding from federal programs. Under the False Claims Act, it is a crime to knowingly submit, or cause the submission, of a false claim, statement or record regarding any federal health care program. This would include any program providing health benefits directly, through insurance, or otherwise, funded directly, in whole or in part, by the United States government or any state health care system.

#### **What is a false claim?**

A claim is “false” if the individual or organization has either “actual knowledge” that it is false, or acts with deliberate ignorance or “reckless disregard” of the truth, resulting in penalties.

False claims may include:

- Billing for services that were not provided.
- Billing multiple payers for the same service.
- Submitting false statements to obtain payment for services.

We are highly committed to honesty and accuracy when creating and preparing record entries. You should never make a false entry in, or delete an entry from, a medical record. All patient-related information and records, expenses, reports and other similar documents must be entered, recorded and amended in accordance with UCLA Health policies. If you must make a change,

whether it is a correction or an addition, you must clearly notate the date and the amendment that was made.

You should never include false, fraudulent, deceptive or misleading information in UCLA Health records. It is your duty to report any such acts to your manager, supervisor or the Office of Compliance Services. You may also file a False Claims Act lawsuit. The False Claims Act protects individuals from being fired, demoted, threatened or harassed by their employer as a result of filing a False Claims Act lawsuit.

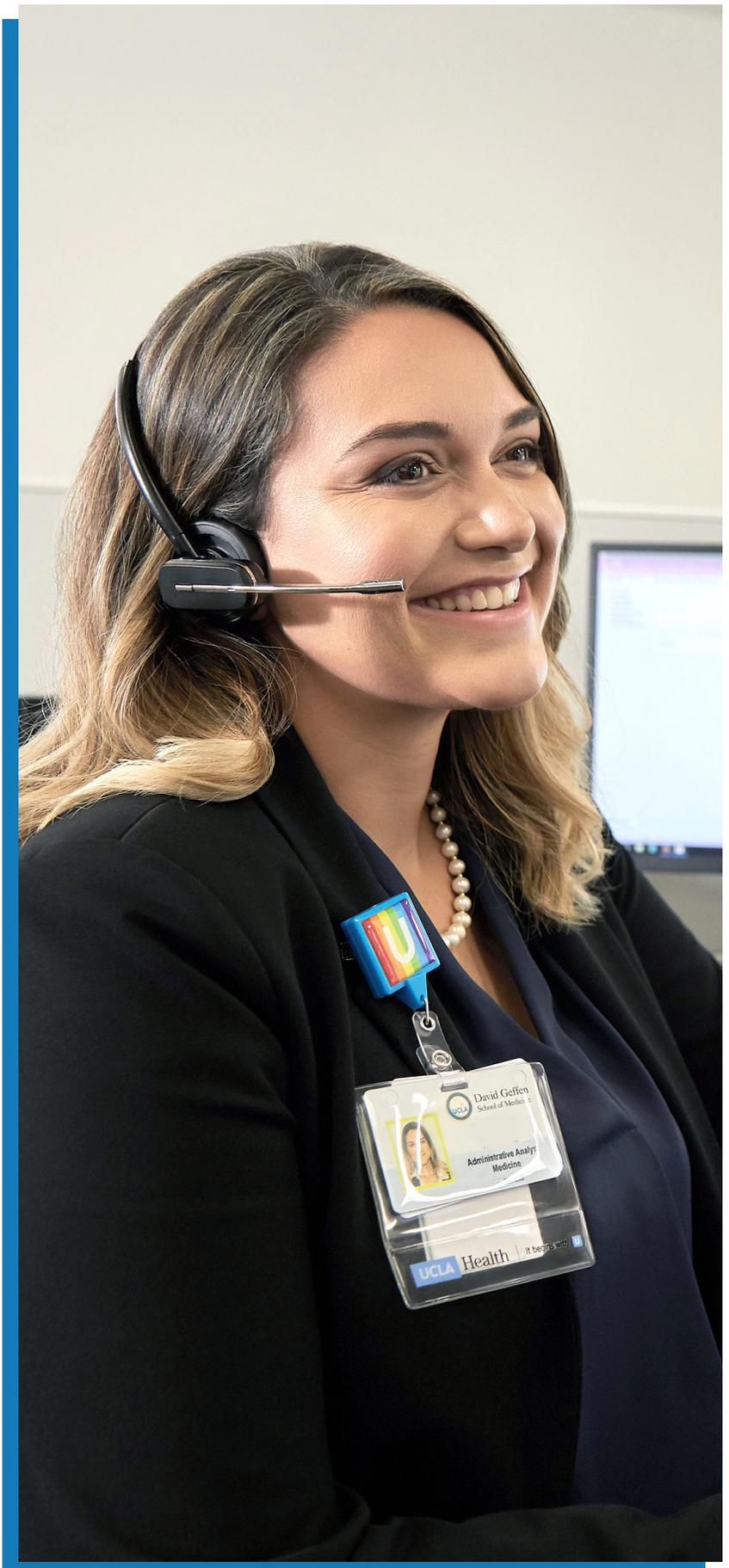
### **CODING AND BILLING ACCURATELY FOR SERVICES**

To provide the most honest care for our patients, we are committed to coding and billing accurately. We should only bill for services rendered, which were medically necessary, and are supported by accurate medical documentation. If we find an error, we must correct it when it is discovered.

We guide you through training, so you can accurately understand coding, billing and documentation, stay up to date on federal and state regulations, and adhere to federal program requirements (i.e. Medicare and Medicaid). To ensure consistency, uniformity and ease, we bill our patients uniformly, we don't overcharge government payers and we apply discounts when appropriate.

#### **→ REMEMBER**

- We are committed to complying with all federal and state health care program requirements, including the False Claims Act.
- We should never knowingly submit a false or fraudulent claim.



## **CORRECT COST REPORTS**

We carefully prepare and review our UCLA Health cost reports before submitting them to a payer. Staff responsible for cost reports ensure that documentation, reports and costs are classified and allocated correctly. If you think you have discovered an error, tell your supervisor or call the Compliance Hotline at 800-403-4744 so it can be corrected. This also provides UCLA Health with a learning opportunity to clarify the information and educate staff, in an effort to prevent recurrences.

## **CREDENTIALING AND PROFESSIONAL QUALIFICATIONS**

We want to make sure our patients are in the most trustworthy hands. To ensure this quality of care, our professionals will be qualified, eligible and licensed to provide the services they perform. We only employ and contract with people and organizations that are appropriately licensed, registered, certified and credentialed, and are eligible to perform their work within the scope of their professional standing.

We are committed to appropriately credentialing our providers and ensuring their licenses are accurate and updated. Credentialing reviews occur before UCLA Health commits to a relationship with a provider. Individual providers are certified according to regulatory requirements. UCLA Health also conducts background checks on medical providers and workforce members upon application to ensure the safety and trust of our patients.

### **→ REMEMBER**

- Maintain your professional licensure, registration and other qualifications in good standing so that you are eligible to perform your work within the organization. This is true regardless of your role – physician, nurse, technologist, language interpreter, attorney, educator, scientist or any other profession.
- Report any professional action that has been started or taken against you, such as a board inquiry, suspension, revocation, expiration, investigatory leaves, lapse of license or eligibility, or exclusion by a health care organization or law enforcement agency.
- Keep appropriate professional relationships with patients and their families, within and outside the care setting. If you are a caregiver, you must follow all standards of professionalism established by your licensing board(s).
- If you have questions about your professional reporting duties, contact Human Resources, Credentialing or the appropriate Medical Staff Office.

**WE ARE READY  
TO LISTEN**





## Compliance programs

UCLA Health is committed to complying with applicable laws and regulations to promote the integrity of the organization as a leading academic health system. This ties to our commitment to providing quality care to all patients and maintaining a safe and fair learning and work environment for all UCLA Health workforce members.

In an effort to further our mission, UCLA Health's Compliance program is committed to providing all UCLA Health workforce members with high-quality education and resources.

The Office of Compliance Services (OCS) is available to answer questions related to appropriate laws, policies and procedures, and to provide guidance on outside relationships with vendors and agents. In addition, OCS provides education regarding privacy, information security, clinical research billing compliance, physician and hospital billing compliance, and other general compliance topics as requested.

## Reporting expectations

At UCLA Health, we have internal controls and operating procedures that aim to detect, prevent and address anything that falls outside of our core values. We want you to feel comfortable voicing your concerns.

As a member of the UCLA Health workforce, you have a personal responsibility to report any activity that appears to violate this Code of Conduct and/or any applicable laws or regulations. UCLA Health expects students, trainees and workforce members to have the courage to be honest if they feel standards have not been met.

## How to report violations

### **COMMUNICATE WITH AN IMMEDIATE SUPERVISOR, DEPARTMENT CHAIR OR EXECUTIVE LEADER:**

Talk through the issue with your supervisor, manager, department chair, institute director or team leader. These individuals should be the most familiar with particular job requirements and business practices. They should give you a quick response or help you find alternative solutions.

### **COMMUNICATE WITH A MEMBER OF MANAGEMENT:**

You can always contact another manager within UCLA Health if you are uncomfortable speaking with your direct supervisor.

### **FIND HELP FROM OTHER UCLA HEALTH RESOURCES:**

You can contact leadership in other departments, including the [UCLA Office of Ombuds Services](#), [UCLA Health Human Resources](#) and [UCLA Audit & Advisory Services](#). *Additional [reporting resources](#) are available to DGSOM employees.*

## **HOW TO CONTACT THE OFFICE OF COMPLIANCE SERVICES**

The UCLA Health Office of Compliance Services is committed to addressing your concerns as soon as possible. Your reports will be investigated or referred to the appropriate personnel to find a solution in a timely manner.

For your safety and privacy, reporters have the option of remaining anonymous. Your privacy is the highest priority and any retaliation or harassment against reporters will not be tolerated. Reporters may contact OCS at any time to raise a question in good faith or for an update on the reported matter. Details of any pending investigation or disciplinary action taken will not be provided to the reporter.

When contacting OCS, make sure to provide as much detail and information as possible to receive the most comprehensive response. To contact the OCS, you can:

**Call:**  
**800-403-4744**

UCLA Health has a Compliance Hotline for you to raise questions, clarify issues or report potential compliance concerns. Independent communications specialists are available 24/7 to assess your situation and document your concerns.

**Email:**  
**CompOffice@mednet.ucla.edu**

OCS maintains an email address where requests for advice can be submitted or for voicing concerns. Emails are triaged to appropriate members of OCS.

### **Online Reporting:**

OCS has additional resources online. You can visit the [website](#) for more information.



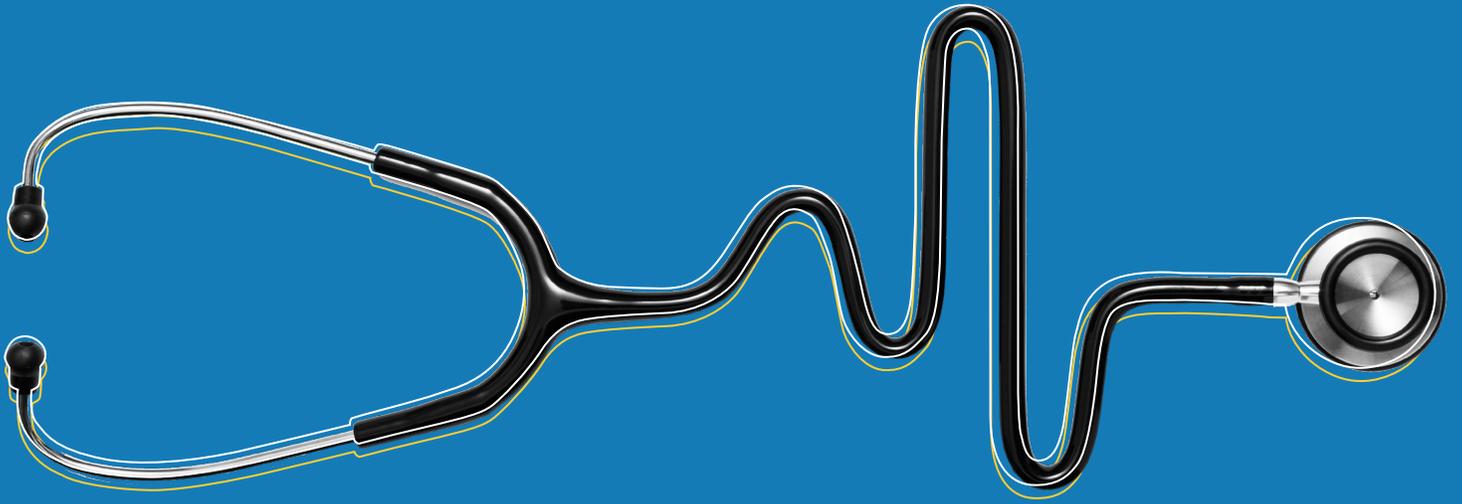
## **WHISTLEBLOWER PROTECTION POLICY**

UCLA Health does not tolerate retaliation against individuals who report issues or concerns to their supervisors or other UCLA offices. If you are concerned that reporting an issue directly could end up causing problems with your supervisor, performance evaluation, future promotions, or retaliation, please call:

**UCLA Health's  
Compliance Hotline:  
800-403-4744**

The False Claims Act protects whistleblowers from retaliation by their employers. It also contains provisions allowing employees with information regarding fraud which involves government health care programs to report such information and file a lawsuit on behalf of the government.

If you have questions about the procedure for filing and addressing concerns, please refer to the [UC Whistleblower Policy](#).



**UCLA** Health

[uclahealth.org](http://uclahealth.org)