

CODE OF CONDUCT

POLICY

The Code of Conduct articulates University Medical Center's (UMC) commitment to comply with all Federal and State regulations, with an emphasis on preventing fraud, waste, and abuse. It also states the organization's mission, goals, and ethical requirements of compliance and reflects a carefully crafted, clear expression of expectations for employees, and members of the workforce

RESPONSIBLE

All Associates
Management (Supervisors, Managers, Directors, Administrators, Officers)
Medical Staff
Board of Managers
Vendors
Members of the Workforce (Students, Volunteers, etc.)

DEFINITIONS

Members of the Workforce- employees, volunteers, students and other persons whose conduct, in the performance of work for UMC, is under the direct control of UMC, whether or not they are paid by UMC.

PROCEDURE

- A. The Compliance Department has established and maintains a process for;
1. Providing a copy of, or the opportunity to electronically review, the Code of Conduct to each new full-time employee including part-time or per diem employee, and members of the workforce within 30 calendar days of his or her employment, affiliation or business status.
 2. Providing orientation Code of Conduct training during new associate orientation (NAO), within 30 calendar days of hire, using training materials and guidance, provided by the Compliance Department.
 3. Collecting a signed Code of Conduct acknowledgement from all persons attending NAO
 4. Publically posting the Code of Conduct on the internal and external website for persons seeking business with UMC to review and for members of the general public.
 5. Internal registration for vendors (in Materials Management Department) provides the Code of Conduct electronically for their review and attestation, with an auditable function.

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6. Conducting a refresher training annually through E-Learning, for all current employees subject to this policy, using training materials and guidance provided by the Compliance Department.
 7. Collecting a signed Code of Conduct acknowledgement from all incoming Residents annually.
 8. Collecting a signed Code of Conduct acknowledgement from all new Medical Staff and newly credentialed Providers monthly.
- B. Code of Conduct Orientation and Refresher training will be tracked by the Compliance Department.
- C. Whenever the Code of Conduct is revised, communication of the changes will be provided by the Compliance Department.
1. To assist in ensuring that employees and members of the workforce continuously meet the expected high standards set forth in the Code of Conduct, the handbook will be regularly updated as applicable statutes, regulations and Federal healthcare program requirements are modified.
- D. Attachment A Code of Conduct Manual (revised 04/2023)

Review/Revision History:

Legal Review	Chief Compliance Officer	CEO	Board Compliance Committee	Board of Managers
06/20	06/20	08/20	08/20	
02/23	03/23	04/23	04/23	04/23

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Approval Signatures:

Dr. Kristina Mena, Compliance Board Committee Chair : 04/23

Cathy Gibson, Chief Compliance Officer: 03/23

Jacob Cintron, Chief Executive Officer : 04/23

Henry Gallardo, Board of Managers Chairperson: 04/23

Committee Approvals:

Legal Review : 02/23

Attachments: [Code of Conduct Manual](#)