Honesty, Integrity, and Fairness should guide each member of our community in all actions and decisions.
P R E S I D E N T ’ S M E S S A G E

UT Southwestern recognizes that its academic, health care, and research operations involve significant legal and ethical responsibilities, and we have an unequivocal commitment to act ethically in all our efforts. Our mission cannot be wholly achieved without this commitment.

Each day our patients, students, and the public count on us to deliver the very best in patient care, state-of-the-art research, and outstanding medical education. As a University, we strive to meet and exceed these goals. By fostering a culture of compliance with established policies and standards, we reassure the community of our commitment to adhering to all applicable laws, rules, and policies.

The Office of Compliance provides employees and departments with resources to help strengthen existing compliance programs and to promote the highest standards of ethical behavior in furthering the University’s mission and strategic plan. The Office of Compliance has several tools to keep us informed about important compliance concepts, issues, and activities. The Standards of Conduct, Compliance Speak (the quarterly compliance newsletter), and various compliance training programs outline operational and ethical standards for the Medical Center. The University’s Policy Office also provides an important resource to the campus community, and the Handbook of Institutional Policies and Operating Procedures provides essential guidance about the policies and procedures all offices and individuals at UT Southwestern are expected to follow.

It is important that everyone know that the institution’s compliance program and responsibilities extend beyond the Compliance Office to encompass all who work and study at UT Southwestern. Our culture rests on each person’s integrity, professionalism, understanding of responsibilities, and efforts to uphold the highest ethical standards in carrying out the Medical Center’s health care, research, and educational activities. These responsibilities and efforts include the duty of all students, faculty, and staff to bring to attention lapses in compliance—and the administration’s responsibility for establishing a campus culture that ensures that there is no retribution or fear of retribution for doing so.

As President of UT Southwestern, I am committed to upholding the highest compliance and ethical standards for the University. I ask each of you to share that same commitment. You are a critical key to the success of the compliance program and to the ongoing success of our Medical Center.

Compliance is everybody’s business.

Daniel K. Podolsky, M.D.
President, UT Southwestern Medical Center
The Standards of Conduct (SOC) is an abbreviated guide to UT Southwestern expectations and standards of behavior and provides 13 basic principles by which University business is conducted. More comprehensive guidance on each of these principles is provided in the University’s Handbook of Institutional Policies and Operating Procedures, which is accessible on our intranet site, My UTSouthwestern, at utsouthwestern.net/policyhandbook. It is the University’s expectation that all offices and individuals will, at all times, follow the policies and procedures included in the Handbook.
Individual Responsibility and Accountability

All members of the UT Southwestern community (employees, faculty, students, vendors, contractors, volunteers, and governing bodies) are expected to exercise responsibility appropriate to their positions and delegated authorities. They are responsible to each other, to UT Southwestern, and to the public for their actions and their decisions not to act. Each person is expected to conduct business using sound judgment and serving the best interests of the UT Southwestern community.

Compliance with Laws, Regulations, and Standards

Because academic medical centers are subject to many laws and regulations, UT Southwestern employees and affiliates are expected to become familiar with regulations bearing on their areas of responsibility. Failure to comply can have serious adverse consequences both for the individual and for UT Southwestern, affecting reputation, finances, or the health and safety of members within the community.

UT Southwestern employees may also be governed by the ethical codes or standards of their professions or disciplines, such as those for attorneys, auditors, or physicians.

Academic Honesty and Scientific Integrity

As members of an academic community that values truth and the pursuit of knowledge, UT Southwestern students are expected to be honest in their academic lives and to present as their own work only that which is genuinely theirs. Each individual has the responsibility to refrain from cheating, plagiarism, or any other form of academic dishonesty.

Similarly, at the core of UT Southwestern’s highly respected research program is a strong commitment to research integrity and ethical scientific methodologies.
Safe and Healthy Workplace

UT Southwestern endeavors to create a safe and healthy environment for employees, patients, and visitors. Safety practices have been put in place to reduce the likelihood of accidents and to minimize exposure to hazardous or infectious materials. UT Southwestern monitors hazardous situations and keeps records of all workplace injuries and illnesses. Employees must immediately report unsafe or unhealthy working conditions to their supervisors or to the appropriate office.

For the health and well-being of our community, UT Southwestern has adopted a tobacco- and drug-free campus policy. Additionally, all students, staff, and faculty are urged to take an active interest in their environment and to immediately notify the University Police of any suspicious persons or activities.

Respect for Others

UT Southwestern prohibits discrimination and harassment against all employees and applicants. We provide equal opportunities for all employees and applicants regardless of race, color, national origin, religion, sex, age, ancestry, sexual orientation, gender identity, gender expression, pregnancy, physical or mental disability, medical condition, marital status, citizenship, or status as a veteran. Degrading or humiliating jokes, insults or slurs, intimidation, or other harassing behaviors are not acceptable at UT Southwestern. We promote an atmosphere of courtesy and respect.

Sexual harassment, which includes sexual advances or requests for sexual favors in conjunction with employment decisions, is prohibited. Verbal or physical conduct of a sexual nature that interferes with work performance or creates an intimidating, hostile, or offensive work environment will not be tolerated. Additionally, romantic or sexual relationships between faculty and their students are prohibited.

Responsible Use of Resources

Each employee is responsible for preserving the organization’s assets, including time, material, supplies, equipment, and information. As a general rule, the personal use of any UT Southwestern asset without prior supervisory approval is prohibited. The occasional use of items such as copiers, telephones, or fax machines, where the cost to the University is insignificant, is permissible. Any use of UT Southwestern resources for personal financial gain unrelated to the organization’s business is strictly prohibited.
Avoiding Conflicts of Interest

A conflict of interest occurs when an individual is involved in multiple interests, one of which might compromise objectivity or professional judgment. Conflicts of interest can arise in the contexts of business relationships, purchasing decisions, use and appropriation of UT Southwestern assets, or research activities. The existence of a conflict of interest can create an appearance of impropriety that can undermine confidence in the person or the institution.

All actual and potential conflicts of interest must be reported and evaluated so that UT Southwestern can take steps to reduce, manage, or eliminate the conflict.

Declining Gifts, Gratuities, and Kickbacks

Faculty and staff should not personally accept any material gifts, gratuities, or other payments, in cash or in kind, from any vendor currently doing or seeking to do business with UT Southwestern.

Privacy and Confidentiality

Many employees have access to sensitive, confidential, or proprietary information. Federal laws and UT Southwestern policies prohibit the unauthorized seeking, using, or disclosing of such information, including confidential information contained in student, employee, and patient records. Such information is to be accessed, used, or disclosed only when authorized and required to complete assigned job duties.

Patient Rights and Quality of Care

UT Southwestern Health System recognizes and supports the rights of all patients to high-quality care without discrimination due to race, creed, religion, national origin, disability, age, payor source, or ability to pay, within the limits of our financial ability. UT Southwestern will always treat patients and their families with consideration, respect, and recognition of their dignity and right to privacy.
Billing and Coding Integrity
UT Southwestern Health System rigorously follows established guidelines in assigning diagnosis and procedure codes that are supported by the health care record. Billing will reflect truth, accuracy, medical necessity, and consistency with quality of care standards. Claims that are known to be false or fraudulent will not be submitted for payment or reimbursement. If an error is discovered, regulatory authorities will be promptly notified.

Professional Behavior
All members of the UT Southwestern workforce are expected to behave in a manner that is consistent with professional, courteous conduct and supportive of excellence in the workplace. Unacceptable behavior includes demeaning, disruptive, or threatening actions or any actions that interfere with the ability of others to do their jobs. Any such behavior will not be tolerated and should be reported to management.

Voicing Concerns
External standards or policies are no substitute for an individual’s internal sense of fairness, honesty, and integrity. Employees who encounter a situation or a course of action that does not feel right are encouraged to discuss the situation with management, the Office of Human Resources, the Compliance Office, or the Compliance Hotline at 877-507-7319.

Hotline service is provided by an external company with operators available 24 hours a day, seven days a week. Complaints may also be filed via the Internet at utsouthwestern.net/hotline. Hotline users may choose to remain anonymous. There will be no retribution or discipline for anyone who reports, in good faith, a possible violation or misconduct.

Employees should never assume that management is aware of a situation or that it is someone else’s responsibility to bring attention to an issue. Maintaining the highest ethical standards is a shared responsibility and one of the privileges of association with UT Southwestern Medical Center.

For further information:
Compliance Office: 214-648-6024, compliance@utsouthwestern.edu
Policy Office: policyoffice@utsouthwestern.edu
Office of Human Resources: hradministration@utsouthwestern.edu
UT Southwestern Office of Compliance
Paul M. Bass Administrative and Clinical Center
3rd Floor, BL3.100
6363 Forest Park Road
Dallas, Texas 75390
214-648-6024
utsouthwestern.edu/compliance

Chief Compliance Officer
Natalie A. Ramello, JD, CHC, CHPC, CHRC, CCEP

Compliance Hotline
You may choose to remain anonymous.

• 877-507-7319
• utsouthwestern.edu/hotline