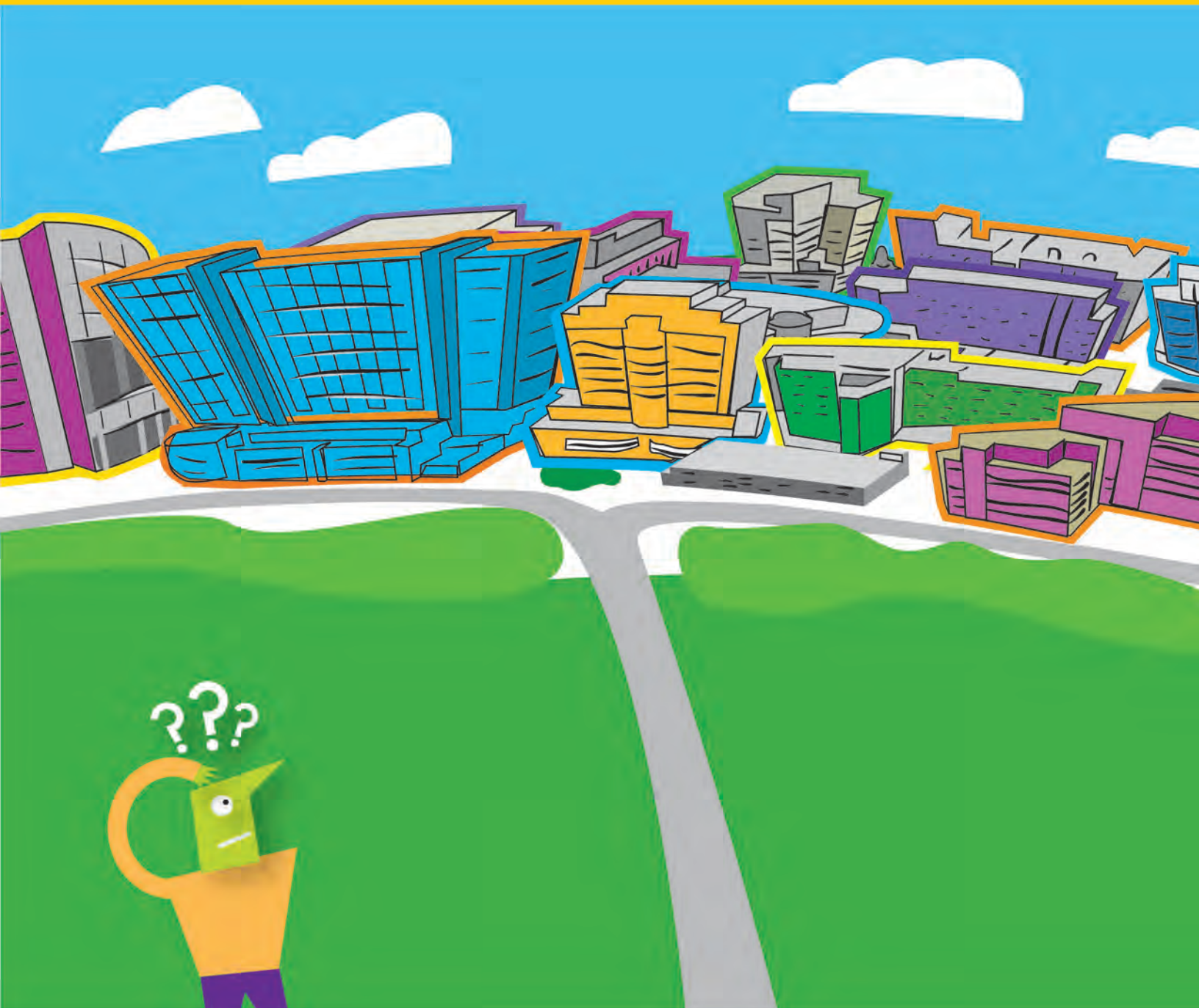




CODE OF CONDUCT AND COMPLIANCE PROGRAM





A message from the Office of the Executive Vice President for Medical Affairs

This Code of Conduct booklet presents the principles and guidelines for everyone who works within Michigan Medicine. Our vision is to create the future of health care through discovery. In doing this, we strive for the highest ethical standards in the way we serve our patients, in the way we conduct research, and in the way we provide education. Michigan Medicine's Code of Conduct and Compliance Program provide the framework to ensure we live up to these high ethical standards throughout our organization – by knowing right from wrong, following our moral compass, and “doing the right thing” each and every day.

Your role in ensuring the highest standards of ethical behavior is crucial to our culture and our continued success in earning the trust and respect of our patients, our students, our colleagues, and the communities that we serve. Please refer to the Code of Conduct when you have questions about any part of the Compliance Program. By “doing the right thing,” we will continue to live our mission through every action we take as members of Michigan Medicine.



Introduction to the Michigan Medicine Compliance Program

The Michigan Medicine Code of Conduct provides guiding principles for every member of the Michigan Medicine's workforce, including faculty and staff, students, trainees, visiting observers, scholars, volunteers or vendors with whom we work to carry out our individual roles here at Michigan Medicine. Our mission is to provide excellence in patient care, research and medical education. By following our Code of Conduct and working in conjunction with the Michigan Medicine Compliance Program, each one of us assures that we carry out our mission with the highest standard of ethics.

The Michigan Medicine Compliance Program applies to Michigan Medicine, which includes UM Health and the University of Michigan Medical School.

What is compliance?

Compliance is "doing the right thing" by following the rules – rules of law, regulations, accreditation standards and our policies. It means we ask questions, report a concern when something doesn't seem right to us and address issues to make sure we are doing things accurately, truthfully and with integrity.

Who is responsible for compliance?

Every workforce member is responsible for compliance. Our workforce includes all Michigan Medicine faculty and staff, students, trainees, volunteers, and those with whom we do business. Every one of us is responsible for compliance.

What should you do if you think a law or a policy is not being followed?

You not only have a right to report your concern, you have a duty to report your concern.

The Michigan Medicine Compliance Program encourages you to speak with your supervisor or manager first. But if you don't feel comfortable speaking with your supervisor or manager, there are several other ways to report your concern:

- Report the issue through your chain of command (to your supervisor or manager's direct manager);
- Call or e-mail the Michigan Medicine Compliance Office at **734-615-4400** or **Compliance-group@med.umich.edu**; or
- Call the U-M Compliance Hotline at **866-990-0111** or submit an online report through the Network Web Reporting System at **<https://compliance.umich.edu>**.

You can remain anonymous when reporting to the Michigan Medicine Compliance Office or to the U-M Compliance Hotline.

What will happen if you report a concern?

Know your concern will be investigated and addressed appropriately, and you are protected by the Michigan Medicine Reporting Compliance Concerns/Non-Retaliation policy. You cannot be retaliated against if you report a compliance concern in good faith.

Table of Contents

Section

1

The Michigan Medicine Code of Conduct and Compliance Program (page 4)

- The Code of Conduct and U-M, Michigan Medicine, and departmental policies
- The Compliance Program
- What should you do if you think a law or policy is not being followed
- The Compliance Hotline
- What will happen if you report a concern
- Expectations of consultants and vendors

2

Respecting others (page 10)

- Treating patients with dignity and respect
- Interacting with colleagues
- Respectful and caring work environment
- Providing the ideal education and teaching experience
- Safe research activities



3

Honor and integrity in our actions (page 14)

- Privacy and confidentiality of patient information and other sensitive data
- Communications
- Conflicts of interest and conflicts of commitment
- Political activities and lobbying
- Government, regulatory and accrediting bodies surveys, reviews and investigations

4

Prudent business practices (page 18)

- Recordkeeping
- Coding and billing
- Preventing fraud, waste and abuse
- Financial reporting
- Safeguarding our assets
- Contracts and interactions with others

5

Your feedback is important (page 22)

- Compliance is a partnership and we are all responsible
- Tell us what you think

SECTION 1

The Michigan Medicine Code of Conduct and Compliance Program

The Michigan Medicine Code of Conduct and U-M, Michigan Medicine and departmental policies

The Code of Conduct provides you with information about what is expected in the workplace. The Code of Conduct applies to every member of the Michigan Medicine workforce – every faculty and staff member, student, trainee, visiting observer, scholar, volunteer and those with whom we do business. It is incorporated into the Compliance Program and must be followed.

The Code of Conduct cannot possibly cover every situation. Rather, it provides guidance to help you determine the appropriate actions to take and to assure compliance with our policies and procedures. Additionally, there are a number of policies that govern our activities.

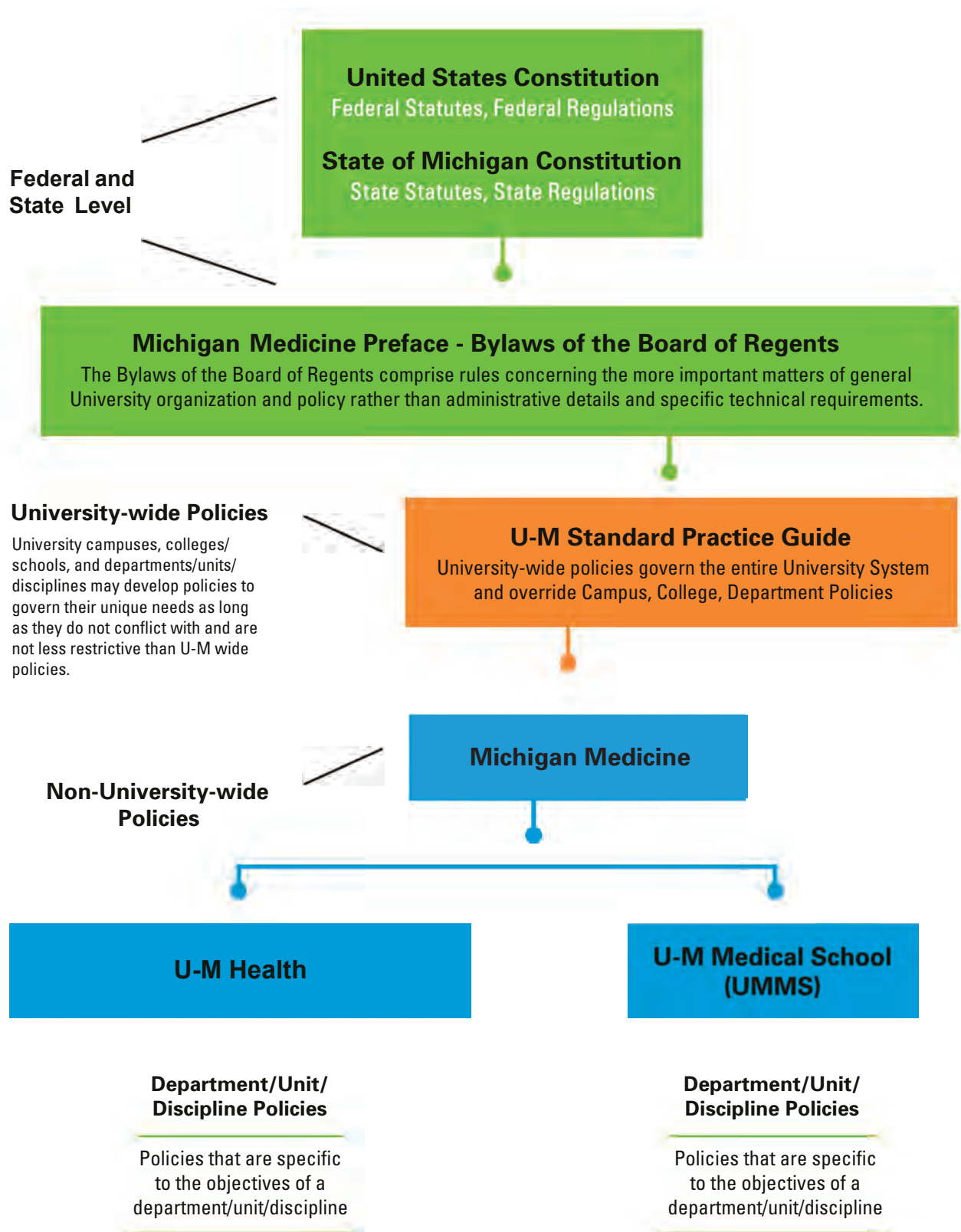
These policies can stem from the University of Michigan Standard Practice Guide and policies applicable to all of Michigan Medicine, as well as your individual unit or department.

For further information you can look to:

- U-M Standard Practice Guide: spg.umich.edu
 - Michigan Medicine policies: <https://michmed-clinical.policystat.com>
 - Departmental or unit policies: Ask your supervisor where you can locate these policies.
-

Notes:

Hierarchy of Legal/Regulatory and Policy Authority



The Compliance Program

The Michigan Medicine Compliance Program operationalizes Michigan Medicines' commitment to conduct its affairs in accordance with all applicable laws, regulations and internal policies. The program is committed to advancing high standards of ethics and integrity. The program monitors, coordinates and supports compliance efforts within Michigan Medicine and provides expertise, resources, policies and procedures, and training related to the numerous laws and regulations that apply to the broad activities performed at Michigan Medicine.

The program's purpose is to maximize compliance with laws and regulations to minimize risk within Michigan Medicine. You can always consult the Compliance Home Page: med.umich.edu/compliance for further information.

The Michigan Medicine Corporate Compliance Program is intended to reasonably achieve the following purposes:

1. Promote the Michigan Medicine Code of Conduct and an ethical workplace which encourages compliance with laws and regulations.
2. Promote alternative methods of communication to encourage employees to participate in the Michigan Medicine Compliance Program without fear of retribution.
3. Promote standards in medical, research, business and legal practices through adherence to Michigan Medicine policies and procedures.
4. Convene a multidisciplinary Compliance Committee representing key operating units and high-risk areas to provide recommendations to the chief compliance officer.
5. Prevent, detect and report civil/criminal conduct concerning internal compliance policies, applicable statutes, regulations or federal health care program requirements by Michigan Medicine employees and third-party affiliates. Assure enforcement of appropriate and consistent disciplinary action for policy violations.
6. Develop a compliance work plan and audit plan to systematically detect and monitor risk areas and assist in the reduction of identified risk. Provide periodic reporting on risk areas and Program effectiveness to governing bodies.
7. Maintain the compliance hotline at **866-990-0111**, investigate complaints promptly and promote procedures that protect anonymity of complainants and protect whistleblowers from retaliation.
8. Educate Michigan Medicine workforce members about their role in the Michigan Medicine Compliance Program.



There are many laws and rules that apply to our work and the Compliance Program. We do everything in our ability to comply with laws, regulations, accreditation standards and policies that apply to Michigan Medicine. The areas addressed include, but are not limited to, adherence to health and safety laws, protecting the confidentiality of patient information and other sensitive data, environmental protection, protection from harassment, discrimination and disruptive or disrespectful behaviors in the work environment and regulation of controlled substances.

What should you do if you think a law or policy is not being followed?

You not only have a right to report, but as a workforce member with compliance responsibility, it is your duty to report. You should report anytime you feel that a law or a policy is not being followed.

Suspected violations or concerns could involve suspected fraud, abuse, falsification or even criminal activity. Possible examples might include:

- Dishonest or inaccurate documentation about care being rendered to a patient
- Dishonest or inaccurate documentation of research results
- Inaccurate coding of health care services

- Acceptance of bribes or kick-backs, or self-referral violations
- Suspicious or fraudulent billing practices such as billing for a service that was not provided
- Patient privacy violations
- Unprofessional, intimidating or disrespectful conduct that creates a hostile work environment



Essentially, you should report any actual or suspected violation of law, regulation, this Code of Conduct and/or policies. You are encouraged to speak with your supervisor or manager first. But, if you don't feel comfortable speaking to your supervisor or manager, there are several other ways to report your concern:

- Report the issue through your chain of command (to your supervisor or your supervisor's direct manager);
- Call or email the Michigan Medicine Compliance Office at **734-615-4400** or **Compliance-group@med.umich.edu**; or
- Call the U-M Compliance Hotline **866-990-0111** or submit an on line report at **<https://compliance.umich.edu>**

Notes:

What is the Compliance Hotline?

If you do not feel comfortable reporting through your chain of command or directly to the Michigan Medicine Compliance Office, the U-M Compliance Hotline is available for you to raise concerns.

You can use the Compliance Hotline by calling **866-990-0111** or by submitting an online report through the On-line Reporting System at **<https://compliance.umich.edu>**. You can remain anonymous if you choose, but be sure to provide as much detail as possible to assure a complete investigation.

The Compliance Hotline can be accessed 24 hours a day, seven days a week. Multi-lingual staff is available to assist you with your compliance concerns.

To learn more about the hotline, please visit the Compliance Hotline website at **compliancehotline.umich.edu**.

What will happen if you report a concern?

Your concern will be investigated and addressed appropriately. If the investigation confirms a violation of a law, regulation, the Michigan Medicine Code of Conduct or applicable policy, disciplinary action will be taken, up to and including termination of employment or a contractual relationship.

Note that retaliation is prohibited. You cannot be retaliated against if you report a compliance concern in good faith, and you are protected by the Michigan Medicine Reporting





Compliance Concerns/Non-Retaliation policy. If you believe retaliation has occurred, you should immediately report it to the Michigan Medicine Compliance Office or to the Compliance Hotline. You also are protected by federal and state whistleblower protection laws.

Any workforce member who violates this prohibition on retaliation against another workforce member will be subject to disciplinary action up to and including termination.

Expectations of consultants and vendors

Consultants, vendors and independent contractors (“Vendors”) provide goods and services to us or on our behalf. They, too, must participate in the Michigan Medicine Compliance Program, follow the Michigan Medicine Code of Conduct, and abide by all applicable laws, regulations, and accreditation standards when providing services. Vendors are required to comply with the U-M and Michigan Medicine policies designed to promote ethical conduct and facilitate regulatory compliance. To ensure this occurs, all Vendors must register and complete the necessary training before entering our facilities. They must abide by our vendor policies, which are available at **med.umich.edu/vendors**.



SECTION 2

Respecting Others


We are committed to treating all persons with care, dignity and respect. This includes:

- Keeping patient information confidential
- Providing the ideal work environment with respectful interactions with our co-workers
- Interacting with other health care providers with the highest standards of ethics
- Providing the ideal educational environment
- Following the highest ethical standards in any research activities involving humans and animals

Treating patients with dignity and respect

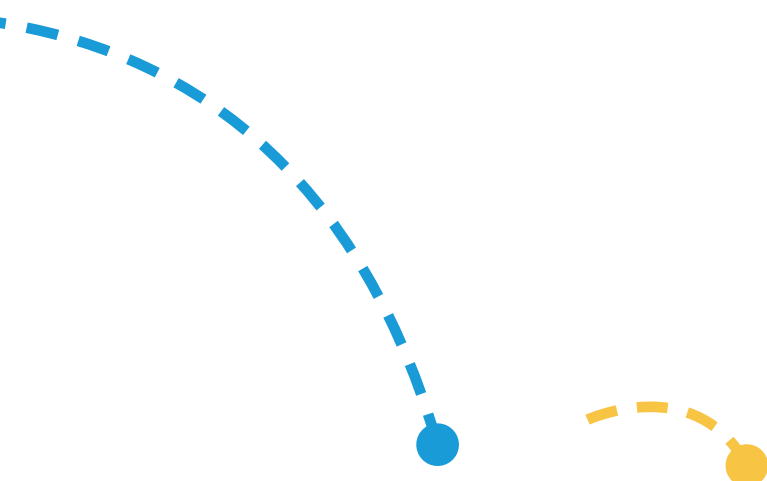
We are committed to treating all patients with optimal dignity and respect. Each of us can do this by:

- Providing compassionate, high-quality care to our patients, without discrimination and while respecting their dignity, values and beliefs
- Honoring patients' rights to participate in and make decisions about their care
- Providing patients with information about their illness, treatment, pain, alternatives and outcomes in a way they can understand

- 
- Identifying ourselves to our patients by telling them our name and our role in their health care
 - Providing patients the opportunity to participate in research or to decline participation in research, and honoring their decision, without compromising their access to care, treatment or services
 - Following the legal requirements to ensure that we respect our patients' rights to private and confidential treatment and the protection of their medical information
 - Encouraging our patients to express their concerns and complaints so we can address them
 - Ensuring that access to care, treatment and services is not compromised when patients share their concerns or complaints

Additional information about patient rights is available in the Michigan Medicine policies at <https://michmed-clinical.policystat.com> including:

- Michigan Medicine Policy 06-01-001 Patient Rights and Responsibilities
- Michigan Medicine Policy 06-01-005 Patient/Representative Complaint/Grievance Management Process



A complete list of Patient Rights and Responsibilities is available online at <https://www.uofmhealth.org/patient-visitor-guide/patients-rights-responsibilities>

Interacting with colleagues

Michigan Medicine strives to act with the utmost integrity in accepting patient referrals and interacting with our colleagues. Federal and state laws govern the relationship between hospitals and physicians who may refer to those hospitals. We accept all patient referrals and consulting based on medical needs. We do not pay, offer or provide benefits to anyone for giving or asking for a referral or consultation. Clinical decisions are based on identified patient health needs including preventive care, and not on financial incentives or lack of reimbursement.

If you have any questions regarding relationships between Michigan Medicine and any referring physician, you can contact the Michigan Medicine Compliance Office or the Office of the General Counsel, call the Compliance Hotline at **866-990-0111** or review our policies on Self Referrals and Kickbacks.



Respectful and caring work environment

Michigan Medicine strives to provide a productive, healthy and safe work environment where everyone is treated with respect and dignity. This is accomplished by adhering to specific standards, including:

- We follow all federal, state, and Equal Employment Opportunity laws and regulations for recruiting and retaining employees. We adhere to all applicable laws, the U-M Standard Practice Guide and Michigan Medicine policies concerning workplace requirements.
- We are committed to promoting the diversity of our work force through recruiting and hiring practices that reflect the diverse community we serve.
- We maintain a harassment-free work environment and conduct ourselves appropriately, treating each other with dignity and respect, without harassment of a sexual nature or based on race, religion, ethnicity, national origin, disability, sexual orientation, gender or age.
- We maintain an Occupational Safety Program designed to provide a safe and healthful environment for staff, including fire, chemical, biological, ergonomic, radiation and electrical safety.
- We adhere to our Violence in the Work Place and our Disruptive or Inappropriate Behavior policies to

provide a work environment that is safe, comfortable and free from all types of threats and violence from visitors and co-workers.

- Our Emergency Operation Plan is in place to effectively respond to any internal or external emergency, such as weather and disasters, that could affect our ability to provide care and continue our operations. The plan also provides a community-wide role in relation to local and state emergency response.
- We maintain a smoke-free campus to create a healthier environment by refraining from smoking on all campus grounds and in all buildings.
- We report to work free of impairment from drugs or alcohol.
- We make sure that medical waste and hazardous materials are handled, transported and properly disposed.
- We follow practices that reduce the spread of infection, including appropriate hand washing, following isolation procedures and wearing personal protective equipment.

Human Resources and Environment/Safety policies are available at <https://michmed-clinical.policystat.com>





Providing the ideal education and training experience

We have been passionate about education and teaching since 1850 when we opened our doors to our very first group of medical students. In addition to training all kinds of students in the health care professions and in research, we provide continued learning for our personnel. We also educate patients and their families and other caregivers about the patient's condition and care. The quality education we provide translates to excellent patient care and innovations in health care.

Safe research activities

Michigan Medicine is dedicated to the safe conduct of research involving human subjects and humane treatment of animals involved in research.

Michigan Medicine is dedicated to the safe conduct of research involving human subjects and humane treatment of animals involved in research.

We follow the highest ethical standards and comply with all federal and state laws and regulations – and our own policies – governing research, investigations and clinical trials involving human subjects or animals.

For more information on specific research compliance areas, applicable policies and source information, or further contact information you can visit **research.medicine.umich.edu**.

SECTION 3

Honor and Integrity in our Actions

Privacy and confidentiality of patient information and other sensitive data

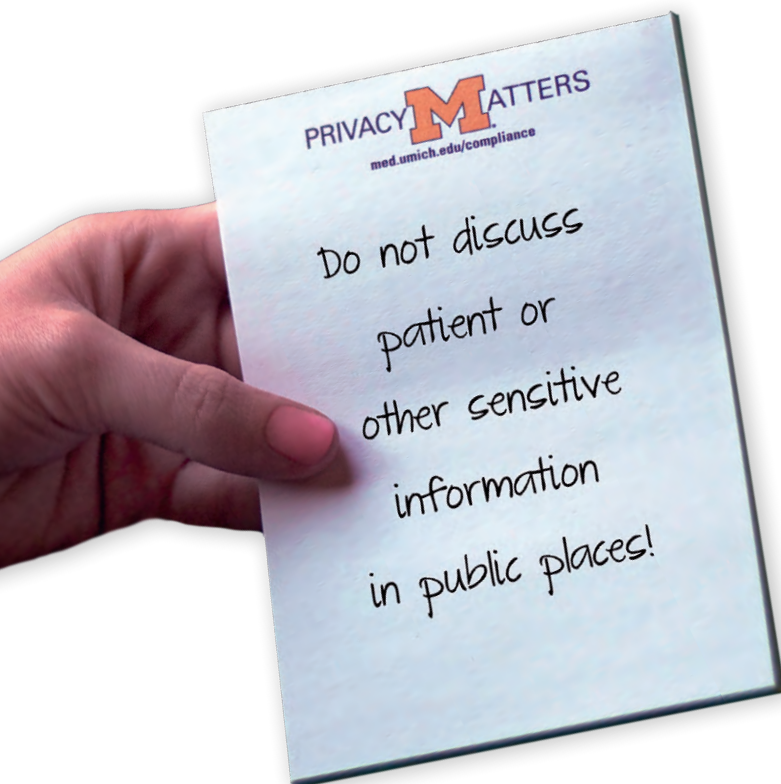
We use confidential information – information that should remain private, whether medical, staff-related, business, financial, or personal – only as needed to do our jobs. We respect and maintain the confidentiality of sensitive information, including our patients' protected health information (PHI), research and student data.

PHI is any health information that could identify a particular person, living or deceased, in any form – electronic, paper or verbal. Examples include hard copy

and electronic patient records, radiology images, billing statements and conversations about patients. We ensure the confidentiality and integrity of all sensitive information with appropriate physical, technical and administrative safeguards in compliance with all of our privacy and information security policies and procedures.

We each have a duty to protect patient and other sensitive information. This means we:

- Access patient information on a need-to-know basis to perform work and nothing more
- Only share information with others for legitimate work-related reasons
- Keep sensitive information from being viewed by unauthorized persons
- Use strong passwords, we do not share them with others, and we adhere to all information security policies and procedures
- Dispose of sensitive information in a secure manner such as shredding or placing in a locked confidential bin
- Log off our workstation before leaving our work area
- Refrain from discussing patient information in public areas such as elevators, waiting rooms and the cafeteria



We also maintain the confidentiality of other sensitive information. For example, this means that we protect the confidentiality of:

- Employee information such as documentation of personnel disciplinary actions
- Non-public financial and research information (inside information)
- Intellectual property (inventions) of the U-M or Michigan Medicine that is not intended for public disclosure and similar information of other entities that has been shared with us on a confidential basis
- Contractual information with vendors and other entities with whom we have signed an agreement

We each have a duty to protect patient and other sensitive information.

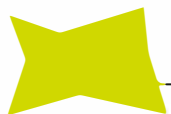
SHHH!



Communications

We use all forms of communication appropriately to provide and receive information between co-workers, those with whom we conduct business and the public. Communication may occur verbally, in writing, via e-mail or fax, through voicemail, by computer transmission, by audio or video recording and publication.

We release information only through appropriate channels and in accordance with applicable laws and policies. We present all communication regarding our services, including marketing, in a truthful and informative manner that provides an accurate representation of our services and care provided.



Conflicts of interest and conflicts of commitment

We are required to act with honesty, integrity and in the best interest of the University when performing work on behalf of Michigan Medicine. We cannot use our knowledge or position to personally profit or assist others in profiting at the expense of the U-M or Michigan Medicine – doing so would constitute a conflict of interest or conflict of commitment.

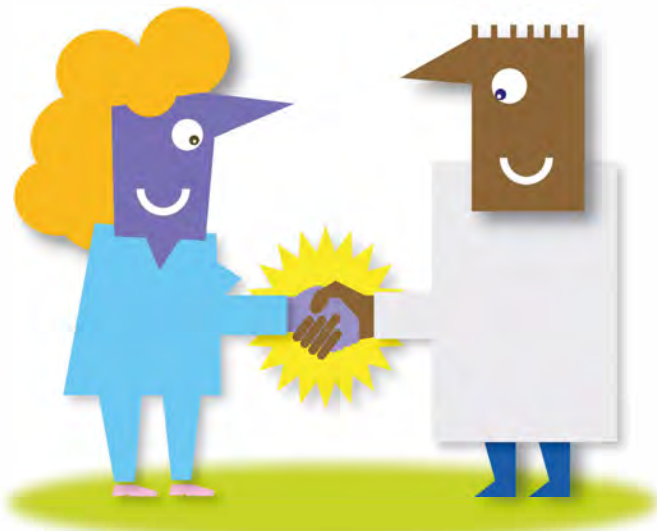
A “conflict of interest” exists whenever personal, professional, commercial or financial interests or activities outside of the University or Michigan Medicine have the possibility (either in actuality or in appearance) of:

- Compromising a Michigan Medicine workforce member’s judgment
- Biasing the nature or direction of scholarly research
- Influencing a workforce member’s decision or behavior with respect to teaching and student affairs, appointments and promotions, uses of University or Michigan Medicine resources, interactions with patients or human subjects, or other matters of interest to the University or Michigan Medicine

- Resulting in a personal gain for the workforce member or for his/her family members’ gain or advancement at the expense of the University or Michigan Medicine.

A “conflict of commitment” exists when a Michigan Medicine workforce member’s external relationships or activities have the possibility (either in actuality or in appearance) of interfering or competing with the University’s or Michigan Medicine’s missions of education, research and clinical care, or the Michigan Medicine workforce member’s ability or willingness to perform the full range of responsibilities associated with his or her position.

The Michigan Medicine policy regarding conflict of interests and conflict of commitment requires different methods and types of disclosures of outside interests and/or conflicts of interests by personnel and their spouses, domestic



partners, and dependent children, depending on the employee's role at Michigan Medicine. It may be okay to have a conflict of interest or conflict of commitment, but it must be disclosed and managed appropriately. For more information on conflicts of interests, or for further assistance, you can visit the Conflict of Interest website at www.med.umich.edu/u/compliance/regulatory/coi.html

Political activities and lobbying

Political activities

As Michigan Medicine workforce members, we are encouraged to exercise our civic duty and take part in the political process. But we cannot use Michigan Medicine or U-M property or funds to support a political cause, party or candidate.

We cannot use Michigan Medicine or U-M assets, such as computers, e-mail system, telephones, copy machines, or our work time to support any political activity.

We are clear that the political views we express as individuals are our own and are not representative of Michigan Medicine or the U-M.

Lobbying

The University's Government Relations offices in Ann Arbor and Washington, D.C., are available to give guidance on lobbying and to help faculty and staff develop strategies for effective interactions with elected and appointed officials regarding legislation and policies affecting the University.



Government, regulatory and accrediting bodies surveys, reviews and investigations

Michigan Medicine strives to maintain continuous compliance with applicable laws, regulations and accreditation standards and continuous readiness for routine, for-cause, and law enforcement surveys, reviews and investigations. We cooperate fully with any appropriate request by a government agency for information. Any non-routine inquiry, civil investigative demand, subpoena or request of another agency regarding Michigan Medicine facility, department, division, or person associated with Michigan Medicine should be reported immediately to the Office of the General Counsel or by paging the Attorney-on-Call.

OUR COMMITMENT

We are committed to conducting business with the highest standards of business ethics and integrity. As Michigan Medicine workforce members, we accurately and honestly represent the Michigan Medicine and will not engage in any activity intended to defraud anyone of money, property or services.

SECTION 4

Prudent Business Practices

Recordkeeping

- We store medical and billing records in a safe and secure place as required by law and our policy.
- We do not falsify any record, contract or other document.
- We truthfully and accurately maintain all paper and electronic data.
- Only authorized individuals can access medical and billing records.
- We maintain and retain documents such as billing and medical records, as required by law.
- Our cost reports comply with federal and state laws, regulations and guidelines.

Coding and Billing

Coding is how we identify and classify health information based on the care provided as documented in a patient's medical record. Submitting these codes in the billing process is the way we identify charges for services we have provided. We strive to comply with all laws governing federal and state-funded health care programs and the coding and billing rules required by insurance companies.

- We only provide services that are medically necessary, and we only bill for services that have actually been provided and documented.
- We are committed to timely, complete and accurate coding and billing.
- In selecting billing codes to describe services rendered, we select the codes that we believe, in good faith, correspond to the services rendered as documented in the medical record and in accordance with regulatory requirements and guidance.

- We address and respond to billing and coding inquiries and questions in a timely manner.
- We make every effort to correct inaccuracies in billing in a timely manner as required by applicable laws, regulations and policies.

If you have a concern about our coding and billing practices – whether actual or suspected – report it to your supervisor or through your chain of command, or to the Michigan Medicine Compliance Office at **734-615-4400** or the Compliance Hotline at **866-990-0111**.

Preventing fraud, waste and abuse

The Deficit Reduction Act of 2005 requires us to establish policies that provide information about state and federal fraud and abuse laws, and to educate our employees and contractors about these policies. State and federal fraud and abuse laws protect government programs from effects of fraud, waste and abuse of resources through the payment of excessive or inappropriate claims.

The Federal False Claims Act (FCA) protects the government from false or fraudulent claims for payment or reimbursement by a health care provider. The FCA defines a claim as a “request or demand for money or property” made to the government or to a third party that is reimbursed by the government. A claim is “false” if the person or organization presenting it has actual knowledge that the claim is false.



A claim also may be false if the person or organization acts in deliberate ignorance or reckless disregard of the truth or falsity of the information.

The State of Michigan also has enacted laws prohibiting false claims and statements. The Medicaid False Claims Act prohibits a person or organization from making false statements for use in determining rights to a Medicaid benefit or making or inducing false statements with respect to its qualifications as a hospital, home health agency or other facility. The Medicaid False Claims Act also prohibits any agreement or conspiracy to defraud the state by obtaining or helping someone else obtain payment or allowance of a false claim. This law also prohibits the making of any false claim, including any claim that misrepresents the medical necessity of a health care service.

Michigan has also adopted a Health Care False Claims Act which addresses false claims against private health insurance plans.

The FCA includes specific provisions to protect whistleblowers from retaliation by their employers. Any employee who initiates or assists with an FCA case against his or her employer is protected from discharge, demotion, suspension, threats, harassment and discrimination in the terms and conditions of his or her employment if the employer’s actions are taken in response to the employee’s efforts on the FCA case.

Additional information about the fraud and abuse laws that affect Michigan Medicine and Michigan Medicine policy is available online on the Michigan Medicine Compliance website at **med.umich.edu/compliance**.

Financial reporting

Our organization's financial information helps us manage our business so that we can best serve our patients, research participants, colleagues and others. Partnerships, affiliations, joint ventures and other business activities require review by the Office of the General Counsel. All Michigan Medicine financial and business transactions, such as contracts or sponsored agreements, purchase of services, billing and reimbursement for services rendered and income to our workforce, must comply with applicable laws, rules and standards.

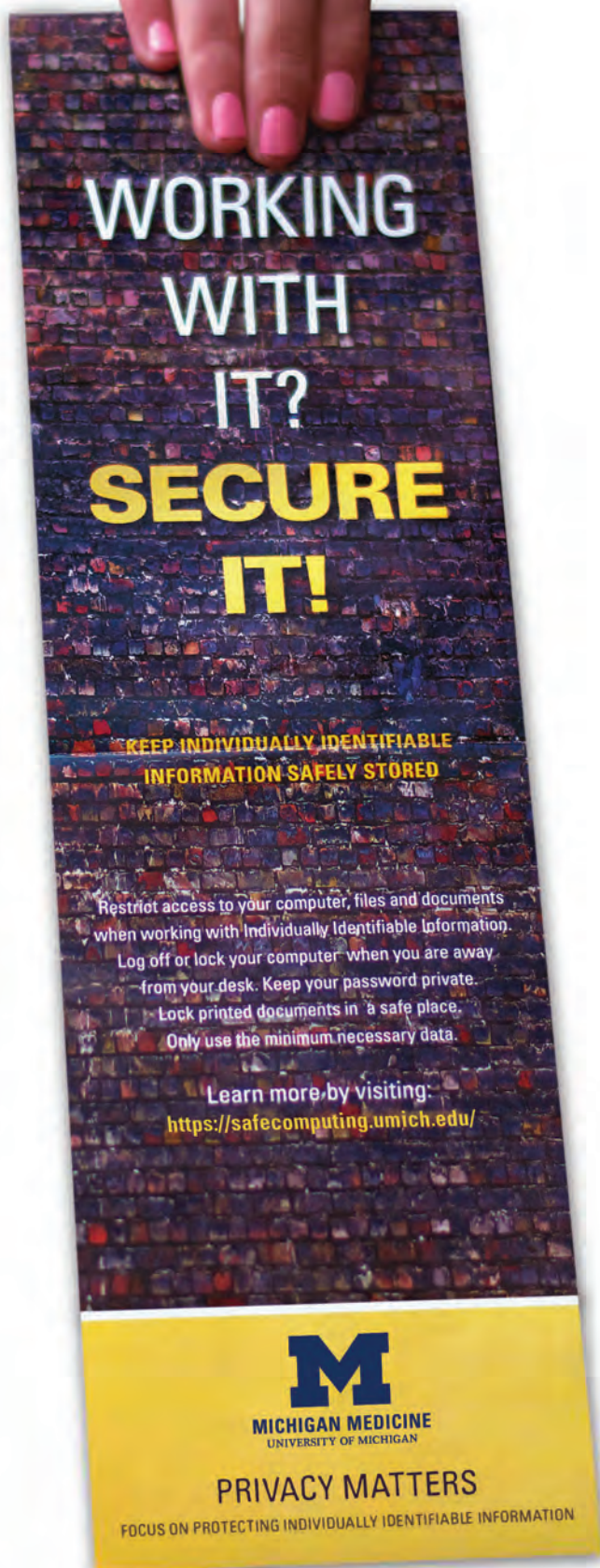
We maintain accounting records in accordance with generally accepted accounting principles and a system of internal controls to ensure accuracy and completeness in documenting, maintaining, and reporting financial information. We cooperate fully with internal and external auditors and any regulatory agencies that examine our books and records.

Safeguarding our assets

Everyone is responsible for using corporate assets properly. Michigan Medicine assets include more than facilities, property, equipment, inventory, endowment, and funds. They also include employee time, financial data, patents, business strategies and intangible intellectual property.



- Michigan Medicine takes steps to protect corporate assets against loss, theft or misuse.
- You should always report loss or theft to your supervisor.
- We handle purchases, transfers or sales of assets in accordance with applicable laws and policies.
- We do not use materials, equipment or other assets for purposes that are not directly related to our business or without prior approval from our respective supervisors.
- We do not photocopy or distribute material from books, periodicals, computer software or other sources in violation of applicable copyright laws.
- We appropriately dispose of our equipment, especially those containing sensitive information.



Contracts and Interactions With Others

We follow the highest business standards in the selection, negotiation and approval of contracts with third parties.

- We maintain confidentiality of pricing and terms of contracts.
- In contracting with vendors, insurance companies and other contractors, we comply with all laws and regulations, including the receipt of fair market value in the payment and receipt of services and products.
- We inform consultants, service providers, vendors and other contractors that they are expected to comply with the Michigan Medicine Code of Conduct.

SECTION 5

Your Feedback is Important



Do Your Part - Do The Right Thing!

Compliance is a partnership between all of us, and we are each responsible as members of the Michigan Medicine workforce.

The Compliance Program and the Michigan Medicine Code of Conduct may be changed to reflect future changes in the laws or Michigan Medicine policies.

We welcome your feedback. If you have any Compliance questions or concerns, please call the Michigan Medicine Compliance Office at **734-615-4400**, send an email to **Compliance-Group@med.umich.edu**, or visit our website at **med.umich.edu/u/compliance**.

Notes:

Michigan Medicine Code of Conduct Attestation

Michigan Medicine is committed to excellence and leadership in patient care, education and research.

As an employee, faculty member, student, trainee, visitor, scholar, volunteer or vendor, I understand that I play a vital role in the success of the Michigan Medicine mission and that I will be held accountable for compliance with applicable law and University and Michigan Medicine policies and procedures. This statement summarizes the standards of conduct that Michigan Medicine requires me to uphold.

☐ **Knowledge, understanding and compliance with the policies and procedures that apply to my work.** I agree to comply with all of the policies and procedures that relate to my work at Michigan Medicine, including the Code of Conduct. I agree that if I do not know whether an action is permitted, I will ask my supervisor or review the relevant policies. Sources include the U-M Standard Practice Guide and Michigan Medicine policies. If I do not know what is permitted or required, I may contact the Michigan Medicine Corporate Compliance Office (734) 615-4400 or the Office of the General Counsel at (734) 764-2178 for guidance.

☐ **Avoiding fraud, waste and abuse.** I will accurately and honestly perform my work for Michigan Medicine, and will not engage in any activity intended to defraud anyone of money, property or services. I will not request or accept payment, either directly or indirectly, that is intended to induce referrals, or to induce the purchasing, leasing, ordering or arranging for any item or service at or from any organization or facility. I will comply with Michigan Medicine policies and University of Michigan Standard Practice Guide on conflicts of interest and on interactions between vendors and faculty/staff. I will report any potential fraudulent or false claims, inappropriate billing practices, or similar concerns to my supervisor, the Compliance Office or through the University of Michigan Hotline.

☐ **Protecting the confidentiality and security of information.** I may have access to proprietary or confidential information about Michigan Medicine operations, workforce members, research subjects, and/or patients (“sensitive information”). All of this information, in whatever form transmitted or received (e.g., oral, fax, photographic, written, electronic), must be treated by me in a confidential and secure fashion. I have completed and understand the Michigan Medicine HIPAA training required for my position.

- ☐ I will not access, release, or share sensitive information unless doing so is necessary as a part of my assigned duties, or otherwise authorized to do so (such as through a signed Release of Information from a patient.) **I understand that my access to Michigan Medicine systems containing sensitive information may be audited at any time**, with or without cause. I understand that I am responsible for any access that occurs using my password.
- ☐ I will protect sensitive information. **I will not share my passwords or access to any Michigan Medicine systems or applications with any other person.** I will be careful to avoid inadvertently revealing sensitive information, including avoiding discussions of sensitive information in public places. I will not remove sensitive information from Michigan Medicine without my supervisor’s permission, and I understand that I am responsible for maintaining the security of such information in accord with Michigan Medicine standards. **If I use a portable electronic device (e.g., laptop, PDA), I will ensure that it meets University of Michigan and Michigan Medicine information security policies and standards.**
- ☐ I understand that when my employment, affiliation, visitation or assignment with Michigan Medicine ends, I may not take any sensitive information with me, and I may not reveal any sensitive information to any third person without authorization (e.g. a signed Release of Information from a patient or by written release from an authorized Michigan Medicine representative (in the case of proprietary information).

Michigan Medicine Code of Conduct Attestation

☐ **Disclosing actual and potential conflicts of interest or commitment and complying with any plans imposed to manage those conflicts. I agree to report any potential or actual conflicts of interest or commitment, and I have reported any current potential or actual conflicts of which I am aware.** An actual or potential conflict occurs if I or a family or household member has an outside personal, professional, commercial, or financial interest. While outside relationships and activities that further the University's academic and clinical missions are encouraged, conflicts can arise. The existence of a conflict is not inappropriate in and of itself. However, in an academic or clinical setting, these relationships or activities can compromise or be perceived to compromise basic values of openness, scientific integrity, independence, and public trust. I understand that for these reasons, actual or potential conflicts must be disclosed and managed to assure that they do not compromise my judgment, bias my research, influence my decisions with respect to academic or clinical matters or University business, result in personal advancement at the expense of the University, or otherwise interfere or compete with the University's educational, research, or service missions, or with my ability or willingness to fulfill my responsibilities. I will disclose actual or potential conflicts of interest and conflicts of commitment as required by University and Michigan Medicine policies. [If I am a vendor employee, I have reported and will continue to disclose any such conflicts to my employer.]

☐ **I agree to treat all Michigan Medicine personnel with respect, courtesy, and dignity** and will conduct myself in a professional and cooperative manner. I understand that collaboration, communication and collegiality in the workplace are essential for the provision of safe and competent patient care. Examples of appropriate and inappropriate behavior are provided in Michigan Medicine's policy regarding Disruptive or Inappropriate Behavior by Michigan Medicine Personnel. I also agree to report any disruptive or inappropriate behavior that I am subjected to or that I observe in the workplace.

☐ **I understand that if I do not comply with University or Michigan Medicine policies and procedures or applicable law, I may be subject to immediate disciplinary or corrective action, up to and including dismissal, termination of contract, and/or loss of access to Michigan Medicine property or resources.** I understand that noncompliance with federal or state law may result in criminal and civil penalties against the University, my employer (if I am employed by another entity) and/or me personally.

☐ **I agree to immediately report suspected noncompliance** to my supervisor, or to the Michigan Medicine Compliance Office at (734) 615-4400. I understand that I may also make such a report through the Compliance Office website (<http://www.med.umich.edu/u/compliance/index.html>), or anonymously to the Compliance Hotline (866-990-0111 or at <https://compliance.umich.edu/report-a-concern/>.) or I agree to cooperate with any investigation of possible noncompliance and not to withhold relevant information. I will immediately report to my supervisor and Medical Staff Services (if I am a member of the medical staff, physician's assistant, or advanced practice nurse) or Human Resources (if I am licensed, certified, or registered as a health professional) any suspension, restriction, termination, or change in status of any health professions license that I hold. Michigan Medicine does not tolerate retribution or retaliation against anyone reporting suspected noncompliance in good faith.

BY SIGNING BELOW, I CERTIFY THAT I AM IN COMPLIANCE WITH ALL UNIVERSITY AND MICHIGAN MEDICINE POLICIES AND PROCEDURES, INCLUDING THOSE THAT REQUIRE ME TO REPORT ANY SUSPECTED NON-COMPLIANCE.

Name	Date
Signature	Employee ID # or Vendor Employer ID #



Executive Officers of Michigan Medicine: Marschall S. Runge, M.D., Ph.D. Executive Vice President for Medical Affairs, Dean, Steven L. Kunkel, Ph.D. Executive Vice Dean for Research, David C Miller, M.D., M.P.H, Executive Vice Dean for Clinical Affairs, Debra F. Weinstein, M.D., Executive Vice Dean for Academic Affairs.

Regents of the University of Michigan: Jordan B. Acker, Michael J. Behm, Mark J. Bernstein, Paul W. Brown, Sarah Hubbard, Denise Ilitch, Ron Weiser, Katherine E. White, Santa J. Ono, *ex officio*.

The University of Michigan, as an equal opportunity/affirmative action employer, complies with all applicable federal and state laws regarding nondiscrimination and affirmative action. The University of Michigan is committed to a policy of equal opportunity for all persons and does not discriminate on the basis of race, color, national origin, age, marital status, sex, sexual orientation, gender identity, gender expression, disability, religion, height, weight, or veteran status in employment, educational programs and activities, and admissions. Inquiries or complaints may be addressed to the Senior Director for Institutional Equity, and Title IX/Section 504/ADA Coordinator, Office for Institutional Equity, 2072 Administrative Services Building, Ann Arbor, Michigan 48109-1432, 734-763-0235, TTY 734-647-1388, institutional.equity@umich.edu. For other University of Michigan information call 734-764-1817.

© 2022, The Regents of the University of Michigan.