

Globethics Repository

The logo for Globethics, featuring the word "Globethics" in white, sans-serif font centered within a solid blue rectangular background.

Code of Conduct

This page was generated automatically upon download from the Globethics Repository. More information on Globethics see <https://www.globethics.net>. Data and content policy of Globethics Repository see <https://repository.globethics.net/pages/policy>.

Item Type	Preprint
Authors	Oregon Health and Science University (OHSU)
Rights	With permission of the license/copyright holder
Download date	2026-06-11 19:47:40
Link to Item	http://hdl.handle.net/20.500.12424/210330

Code of Conduct



Message from the president

Dear Colleagues:

OHSU has a well-deserved reputation for its clinical expertise, research breakthroughs and academic achievement. Each of us can take pride in that reputation because it takes all of us working in concert to meet the expectations that are intrinsic in our missions. Each of us also plays an important role in establishing and sustaining an environment that is respectful of others, committed to excellence and attentive to meeting the highest ethical standards.

As an academic research university and health care system, we must abide by numerous laws and regulations, as well as the accepted standards of our professions. This is true whether we are teaching future scientists and health care professionals, working in labs to find solutions to complex questions, caring for patients who are in need of our health care services, or providing the services that support our missions.

The OHSU Code of Conduct is designed to help employees understand the philosophy, policies and expectations of the university. The current edition of the code includes OHSU's guiding principles as well as the standards that express the practical application of those principles. Additionally, it provides policy references, quotations, and questions and answers about common situations.

OHSU has experienced remarkable growth over the past few years and is widely recognized as a premier health and science university. As we continue our evolution and realize our vision, it is vital that we remain committed to our traditional missions. Now, more than ever, our continued success depends on collaboration, honesty, respect, and the trust of those with whom we work or serve.

Please join me in carefully reviewing this Code and adhering to the standards it outlines. Thank you.

Joe Robertson, M.D., M.B.A.

President

Oregon Health & Science University

Table of Contents

Message from the president

<u>Introduction</u>	4
<u>OHSU's vision and core values</u>	5
<u>Principles and standards</u>	5
<u>Professional</u>	6
<u>Patient care</u>	6
<u>Research</u>	7
<u>Academic</u>	7
<u>Confidentiality and privacy</u>	10
<u>Intellectual Property Principles and Standards</u>	10
<u>Diversity, equal opportunity and respect in the workplace</u>	11
<u>Public interactions and political activities</u>	12
<u>Personal and environmental health and safety</u>	14
<u>Fiscal responsibility</u>	14
<u>Business, legal, conflicts of interest</u>	16
<u>Asking questions, reporting concerns, and additional resources</u>	18
<u>Code of Conduct Questions and Answers</u>	23
<u>Guiding Principles Summary Page</u>	38

Introduction

The OHSU Code of Conduct guides the behavior and performance of members of the Oregon Health & Science University community. The OHSU Board of Directors, the OHSU Foundation and Doernbecher Children's Hospital Foundation boards of directors, and the FPP Board of Directors have approved this Code of Conduct. It has been adopted as policy and all OHSU Members are held to its standards. As with other OHSU policies, those who violate the Code of Conduct are subject to disciplinary action.

The OHSU Code of Conduct applies to all OHSU Members, defined as:

- Employees (faculty, represented, unclassified administrative and other categories)
- Registered and visiting students
- Volunteers
- Members of OHSU and Doernbecher Children's Hospital Foundation Board of Directors
- Visiting health care practitioners
- Contracted nonpermanent individuals
- Vendors while doing business with OHSU
- Others who work for or on behalf of:
 - OHSU
 - Faculty Practice Plan (FPP)
 - OHSU Foundation
 - Doernbecher Children's Hospital Foundation

“OHSU” refers to Oregon Health & Science University and includes:

- The schools of dentistry, medicine, nursing, and science & engineering
- OHSU Hospital, Doernbecher Children's Hospital, and numerous primary care and specialty clinics
- Multiple research institutes and centers
- Several community service and outreach units
- OHSU Foundation
- Doernbecher Children's Hospital Foundation
- Faculty Practice Plan (FPP)

OHSU's Vision and Core Values

OHSU's fundamental purpose is to improve the well-being of people in Oregon and beyond. As part of its multifaceted public mission, OHSU continually strives for excellence in education, research, clinical practice, scholarship, and community service. Through its dynamic interdisciplinary environment, OHSU inspires the spirit of inquiry, initiative, and cooperation among employees, students, volunteers, and other members of the OHSU community.

The vision of OHSU is to be a national and international leader in health care, education, research, and technology development.

The OHSU community is committed to the following core values:

- Achieving excellence in all we do.
- Providing quality care in a compassionate and culturally sensitive manner.
- Creating new knowledge through human, animal, basic, and applied research and innovation in health and biomedical sciences, environmental engineering, and computation and information technology.
- Providing the highest-quality education for the next generation of health care professionals, scientists, engineers, and educators.
- Providing the highest-quality education for continued professional growth and development.
- Fostering a spirit of collegiality and integrity.
- Advocating for fair and equitable access to health care.
- Maintaining a high level of accountability and stewardship for the responsible use of resources.
- Encouraging, creating, and respecting diversity within OHSU.
- Fostering an environment of open, honest, and respectful communication throughout the OHSU community.
- Standing as a role model for service to the community.
- Stimulating and nurturing the intellectual creativity of the OHSU community.
- Complying with all federal, state, and local laws and OHSU policies including this Code of Conduct.

The principles and standards that guide us

Guiding Principles

Each section of this Code of Conduct contains "Guiding Principles." The Guiding Principles reflect the philosophy, policies, and expectations of the university.

Standards

Each Guiding Principle is followed by statements that express the standards, understanding and support of the OHSU community for that particular concept.

Questions and Answers

The Q&As that are included at the end of the Code of Conduct provide additional information and examples for the purpose of clarification; they are not meant to be complete explanations of applicable policies or procedures. They do not represent actual situations that have occurred; selected examples have been taken from other institutions.

Section A

Professional Principles and Standards

Guiding principle — OHSU Members are honest, ethical, and respectful. We exemplify personal integrity and ethical behavior.

We continually strive to be honest, ethical and respectful at all times, regardless of whether a specific law, OHSU policy or procedure covers the situation. Each of us has a responsibility to conduct activities, and use funds and resources in a responsible and ethical manner.

We comply with all applicable laws and OHSU policies and procedures.

We are accountable for the quality of our job performance and accept personal responsibility for maintaining our integrity when we represent OHSU.

We do not abuse the power and authority we might have based on our title or position.

We uphold standards of professional and ethical practice in all OHSU facilities and programs.

Guiding principle — OHSU endorses the professional standards and requirements that are applicable to the clinical, research, academic, administrative, and other professions comprising the OHSU community.

We observe the standards of our respective professions.

We exercise good judgment and professional objectivity.

We resolve professional differences of opinion through ethical discussions and scholarly debate, which are conducted in a respectful manner.

We allow only qualified and licensed individuals to practice, teach or conduct research.

Section B

Patient Care Principles and Standards

Guiding principle — OHSU is committed to providing compassionate, appropriate, high-quality, cost-effective care in a manner that is sensitive to our patients' individuality, personal beliefs, and culture, and protects patient rights, privacy, and confidentiality.

We pursue excellence in delivering high-quality health care to our patients in a responsible, reliable and cost-effective manner.

We respond to individual, family and community health care needs and advocate for access to equitable and appropriate health care.

We honor the wishes and desires of our patients and, when appropriate, their families in our plan of care.

We recognize the importance of honest disclosure and take note of deficiencies and errors, even those that may seem small or insignificant. We help foster an environment that is open to improvement and system changes by taking prompt action to report deficiencies and errors to the appropriate individual in our department or work unit in accordance with OHSU policies and pertinent professional standards. (See [OHSU Health Care System Clinical Policies and Procedures Manual](http://www.ozone.ohsu.edu/HealthSystems/medstaff/xi-bd.htm) – R&R XI-BD, which is available online at www.ozone.ohsu.edu/HealthSystems/medstaff/xi-bd.htm.)

We do not mislead patients or misrepresent a diagnosis to justify the services we provide. (See [OHSU Health Care System Clinical policies, procedures and guidelines](#).)

We carefully maintain patient records and documentation to comply with legal guidelines and ethical codes, and ensure that all students and residents we supervise do the same.

We do not provide treatment for ourselves or members of our immediate family except in emergencies.

We protect patient privacy and respect the confidentiality of health information. (See [OHSU policy 01-05-](#)

Section C

Research Principles and Standards

Guiding principle — The integrity of OHSU’s researchers and OHSU’s commitment to the ethical conduct of research are critical to the university’s research mission.

We respect human and animal research participants and are committed to their humane treatment.

We protect human research participants, laboratory personnel, laboratory animals and scientific integrity by first securing appropriate institutional review and approval for any research.

We adhere to approved protocols and obtain prospective approval of any changes in those protocols. (*See [OHSU policies, Chapter 4.](#)*)

We engage all human research participants or their appropriate representatives in a meaningful informed consent process.

We protect the scientific integrity and unbiased reporting of our research.

We recognize that we must continually earn our reputation for integrity. Because we are committed to the well-being of our research participants and their families, we create and maintain an environment that fosters privacy, security and comfort. This includes maintaining a safe and healthy research environment and not tolerating acts of plagiarism, falsification, or fabrication of data, or other scientific misconduct. (*See [OHSU policies 04-15-005, 04-15-015, 04-15-020, 04-15-025, 04-15-030, 04-15-035.](#)*)

Our investigators comply with all stated terms and conditions of grant awards to, and contracts with, OHSU and ensure proper recording and charging of all costs to appropriate accounts. (*See [OHSU policy 04-40-001 - 04-40-020.](#)*)

We are familiar with and comply with OHSU’s Roles and Responsibilities in the Conduct of Research and Administration of Sponsored Projects.

Section D

Academic Principles and Standards

Guiding principle — OHSU provides outstanding educational opportunities for those who will be tomorrow’s health care professionals, scientists, engineers, managers, and educators.

Those of us who teach create and nurture a collegial environment in which students are valued and respected, and knowledge is imparted in an accurate, thorough and stimulating manner. Our students will be encouraged to engage in continual scientific inquiry and become lifelong learners.

Those of us who are students honor the learning environment through active participation. We respect our mentors and fellow students.

Guiding principle — OHSU places a high value on intellectual curiosity, academic freedom and integrity, and outstanding professional preparation.

Those of us who teach recognize the responsibility we have to foster our students’ professional growth and ethical behavior. We always treat students with respect, protect our students’ privacy, and ensure a safe and equitable learning environment where students feel safe to express opinions and ask questions. In an atmosphere of scholarship, professionalism, and mutual respect, we will carefully weigh the credentials of each candidate for graduation, ensuring that only those who have exhibited the appropriate level of expertise and demonstrated that they are deserving of the public’s trust are allowed to graduate.

Those of us who are students honestly represent our skills, abilities, and work we have done individually and collaboratively. As students we embrace the ethical expectations associated with our future professions and demonstrate a level of competence consistent with the responsibilities we have chosen to assume.

Academic: Student Financial Aid

As Required Under 34 CFR Part 601.21

The staff of the OHSU Financial Aid Office acts in the best interest of OHSU students. This includes advocating for appropriate and compliant student loan access. Federal regulations, in the form of in the Higher Education Opportunity Act (HEOA), mandate the adoption of a student loan Code of Conduct with respect to any student educational loan. This section of the OHSU Code of Conduct addresses that requirement.

OHSU does not participate in any preferred lender arrangement for any student educational loan. Any OHSU staff member with responsibilities for any educational loan will comply with the provisions of this Code of Conduct.

This Code of Conduct prohibits:

1. Revenue-sharing arrangements with any lender for any student education loan.
2. Employees with responsibilities for any educational loan from receiving gifts from a lender, a guarantor, or a loan servicer.
 - The term gift includes any gratuity, cash (or cash equivalent), favor, discount, entertainment, travel, hospitality, loan, or other item having monetary value. Per OHSU's Individual Acceptance of Gifts, Food, Beverages, Travel, and Entertainment ([10-01-025](#)), even gifts of de minimus value cannot be accepted. This includes a gift of services, transportation, lodging, or meals, whether provided in kind, by purchase of a ticket, payment in advance, or reimbursement after the expense has been incurred. A gift to a relative of an employee, or to any other individual based on that individual's relationship with the employee, is considered a gift if the gift is given with the knowledge and acquiescence of the employee and the employee has reason to believe the gift was given because of the official position of the employee. The term "relative" is defined in OHSU policy [10-01-025](#).
 - The term "gift" does not include any of the following:
 - Standard material, activities, or programs on issues related to a loan, default aversion, default prevention, or financial literacy, such as a brochure, a workshop, or other training;
 - Training, or informational material provided as an integral part of a training session that is designed to improve the service of a lender, guarantor, or servicer, if such training contributes to the professional development of the staff member;
 - Entrance and exit counseling services provided to students to meet OHSU's responsibilities of 682.604(f) and 682.604(g), as long as the staff are in control of the counseling and such counseling does not promote the products and services of any specific lender;
 - Philanthropic contributions from a lender, servicer or guarantor that are unrelated to student educational loans or any contribution from a lender, servicer, or guarantor, that is not made in exchange for any advantage related to student educational loans and that is made to and in compliance with the policies of the OHSU Foundation;
 - State education grants, scholarships, or financial aid funds administered by or on behalf of a State.

3. Consulting or other contracting arrangements. An employee with responsibilities with respect to any educational loan must not accept any fee, payment, or other financial benefit as compensation for any type of consulting arrangement or other contract to provide services to a lender.
4. Directing borrowers to particular lenders or delaying loan certifications.
5. Offers of funds for private education loans. Employees with responsibilities with respect to any student educational loans may not request or accept from any lender any offer of funds to be used for private education loans, including funds for an opportunity pool loan as described in 601.21(c)(5)(ii), to students in exchange for the institution providing concessions or promises regarding providing the lender with:
 - A specified number of private education loans;
 - A specified loan volume of such loans; or
 - A preferred lender arrangement for such loans.
6. Staffing assistance. Employees with responsibilities with respect to any student educational loan will not request or accept from any lender any assistance with call center staffing or financial aid office staffing, except that the preceding does not prohibit acceptance of:
 - Professional development training;
 - Providing educational counseling materials, financial literacy materials, or debt management materials to students, provided that such materials disclose to students the identification of any lender that assisted in preparing or providing such materials; or
 - Staffing services on a short-term, nonrecurring basis to assist with financial aid related functions during emergencies, including State-declared or Federally-declared natural disasters, and other localized disasters and emergencies identified by the Secretary of Education.
7. Advisory Board compensation. Employees with responsibilities with respect to any student educational loan who serve on an advisory board, commission, or group established by a lender, guarantor, or group of lenders or guarantors, must not receive anything of value from the lender, guarantor, or group of lenders or guarantors, except that the employee may be reimbursed for reasonable expenses, as that term is defined in 668.16(d)(2)(ii), incurred in servicing on such advisory board, commission, or group.
8. Actions that create a conflict of interest with the responsibilities of an employee with respect to any educational loan.

Section E

Confidentiality and Privacy Principles and Standards

Guiding principle — OHSU protects the private and confidential information that is provided by its employees, students, volunteers, and other members of the OHSU community.

We never access confidential, private, or personal information about members of the OHSU community unless required as part of the responsibilities associated with our job.

Guiding principle — OHSU's patients and research participants entrust their privacy and personal health information to OHSU employees, students, and volunteers. OHSU must continually earn this trust through strict adherence to confidentiality practices as outlined in federal and state laws and regulations and OHSU's own privacy and security policies.

- We are deeply committed to the privacy and security of health information and other restricted information entrusted to us by our patients and research participants.
- We hold information about patients and research participants in strictest confidence. Patients rely on us to safeguard their information so that they will feel confident giving us the detailed and sensitive information we need to provide the best possible care. In addition to being the right thing to do, protecting the privacy of health information is also required by law.
- Information regarding patients and research trial participants, students and employees, is confidential. We only share this information with those who have a legitimate need to know and who are authorized to receive such information.
- We only access health information as necessary to perform our job or patient care responsibilities at OHSU.

Section F

Intellectual Property Principles and Standards

Guiding principle — OHSU seeks to create new knowledge through basic and applied research and innovation. A hallmark of health and research universities is their commitment to sharing ideas, research findings, and the products of intellectual pursuits with the broader academic community. This sharing furthers our commitment to truth, the diffusion of successful practices, and the advancement of scientific knowledge for the benefit of the community. When research results in potentially commercializable technologies, OHSU tries to ensure that the technology is developed through appropriate relationships with industry.

We commonly share the products of our professional activity with others in the spirit of academic freedom and encourage this collegial interchange.

When we create intellectual property that may have potential commercial value, we recognize OHSU's ownership interest and that OHSU may assert its ownership rights to the intellectual property.

Section G

Diversity, Equal Opportunity, and Respect at the University Principles and Standards

Guiding principle — OHSU encourages and respects diversity within the university. OHSU prohibits discrimination on the basis of race, color, gender, sexual orientation, religion, national origin, physical or mental disability, marital status, age, veteran’s status, or any other status protected by law, in any activity or operation of the institution.

Guiding principle — OHSU is committed to policies of affirmative action and equal opportunity.

- OHSU’s diversity is an asset that enhances creativity, productivity, and effectiveness, helping us realize our vision of being a national and international leader in health care, education, research, and technology.
- Our actions support the university’s pursuit of diversity in patient care, education, research, and employment.

Guiding principle — OHSU values an environment that is free from harassment, discrimination, disrespectful behavior, and violence.

- We do not engage in degrading jokes, slurs, bigotry, physical or verbal intimidation, unwelcome sexual advances, or other disrespectful conduct when interacting with co-workers, students, patients, volunteers, or visitors.
- We help create an environment at OHSU in which we can openly discuss concerns about diversity and equal opportunity without fear of retaliation or retribution, especially from those in positions of power and influence.
- If we experience or observe any form of prohibited discrimination, including sexual harassment, violence, or other unethical or disrespectful behavior or activities, we are encouraged to talk with our supervisor, manager, an integrity officer, the Affirmative Action & Equal Opportunity Department, the Human Resources Department or the Public Safety Department.
- If we experience or observe harassment, discrimination, violence, or other unethical or disrespectful behavior or activities, we will take appropriate action and follow the reporting procedure as explained in Section L of this code.

Guiding principle — OHSU believes in fostering a spirit of collegiality and open, honest, and respectful communication among all members of the OHSU community.

- We treat everyone, including our patients, visitors, and other members of the OHSU community with respect and dignity regardless of their position, station, or relationship. We value courteous, honest, and respectful verbal and nonverbal interpersonal behavior. Through our words and actions we create a

OHSU Diversity Definition

Diversity at OHSU means creating a community of inclusion. We honor, respect, embrace and value the unique contributions of all employees, patients, students, volunteers and our local and global communities.

Diversity includes age, culture, disability, ethnicity, gender, national origin, race, religion, sexual orientation, diversity of thought, ideas and more.

Diversity maximizes our true potential for creativity, innovation, quality patient care, educational excellence and outstanding service.

OHSU Business Case for Diversity

Diversity is fundamental to OHSU’s ability to attract and retain top talent, promote innovation and creativity, flourish in a competitive market, maximize the return on our investment in people, and ensure flexibility to thrive.

In short, diversity is essential to realize our multifaceted mission and to set the example for integrity, compassion and leadership in health care, education, research and community service.

professional work environment that will be apparent to employees, patients, students, volunteers, and visitors.

- We respect differences of opinion and address conflicts and concerns in a professional manner and recognize that honest disagreement expressed politely is not disrespectful.
- We refer significant differences to appropriate supervisors, managers, or department or university personnel for resolution.
- We share and expect to receive constructive feedback or other corrective action or discipline privately and in an atmosphere of mutual respect.
- We create an environment in which members of the OHSU community may raise ethical and compliance concerns and openly discuss those concerns without fear of retaliation.

Section H

Public Interactions and Political Activities Principles and Standards

Guiding principle — OHSU recognizes the important role it plays as a member of a broader community and supports the community and civic involvement of its employees, students and volunteers. Every public interaction and acknowledgement of OHSU has the potential to enhance or harm the reputation and integrity of the university and those who are associated with it. OHSU has delegated the responsibility of coordinating its public contacts and messages to Public Affairs and Marketing & Communications.

- We work with the university to foster a positive relationship with local, state, and national communities.

Government relations and political activities

Guiding principle — As a public corporation with a mission that is set by Oregon statute and in order to avoid real or perceived conflicts of interest, state law provides guidance for the political activities of OHSU employees.

- We do not use our OHSU titles or affiliation to support or oppose a candidate or issue on a ballot.
- We understand our right as members of the OHSU community to express our personal opinions; however, we do not pursue or advocate for our personal political preferences or activities while at work.
- We avoid giving the impression that we are speaking for OHSU while involved in our personal political activities.
- We do not use OHSU resources, such as stationary, telephones, or e-mail for engaging in political activities unless we are authorized to do so by the Government Relations Department.
- We are also required by Oregon law to abide by the restrictions outlined in the following notice:

ATTENTION ALL PUBLIC EMPLOYEES

The restrictions imposed by the law of the State of Oregon on your political activities are that no public employee shall solicit any money, influence, service or other thing of value or otherwise promote or oppose any political committee or promote or oppose the nomination or election of a candidate, the gathering of signatures on an initiative, referendum or recall petition, the adoption of a measure or the recall of a public office holder while on the job during working hours. However, this section does not restrict the right of a public employee to express personal political views.

It is therefore the policy of the state and of your public employer that you may engage in political activity except to the extent prohibited by state law when on the job during working hours.

The restrictions outlined in this notice also apply to volunteers' political activities while on the job during working hours.

Outreach and volunteerism

Guiding principle — OHSU nurtures a close relationship with its immediate neighbors as well as the community at large. The university encourages employees to share their knowledge and expertise with others through interactions in their neighborhoods and throughout the state.

- We seek guidance and assistance from Public Affairs before representing or committing OHSU in volunteer activities.
- We inform Public Affairs about volunteer and community outreach activities that may be of interest to other employees or students, or may be an opportunity for OHSU to provide official support to such activities.
- We share with Public Affairs information about employees and students who are particularly active in their own communities so they can be appropriately recognized for their contributions.

Public access to OHSU information

Guiding principle — OHSU complies with the Oregon Code of Cooperation published by the Oregon Association of Hospitals and Health Systems to facilitate accurate, ethical and timely news coverage of medical and other health-related events. The code balances the patient's right to privacy and well-being with the public's right to receive information.

Guiding principle — OHSU complies with all laws and OHSU policies regarding the requests for information about the activities of the university, or its employees, students, volunteers, patients or research subjects, carefully balancing privacy rights with the public's interest.

- We work collaboratively with Marketing & Communications to share our activities and accomplishments with other members of the OHSU community, as well as with the public through print and broadcast media.
 - We ensure the information we provide Marketing & Communications and representatives of the media is accurate and that our role is honestly portrayed.
 - We seek assistance from Marketing & Communications to ensure a consistent message and visual identity.
 - We adhere to the guidelines that have been developed and seek help so we can avoid confusion and enhance our common mission.
-
- We work collaboratively with Marketing & Communications to share our activities and accomplishments with other members of the OHSU community, as well as with the public through print and broadcast media.
 - We ensure the information we provide Marketing & Communications and representatives of the media is accurate and that our role is honestly portrayed.
 - We seek assistance from Marketing & Communications to ensure a consistent message and visual identity.
 - We adhere to the guidelines that have been developed and seek help so we can avoid confusion and enhance our common mission.

Section I

Personal and Environmental Health and Safety Principles and Standards

Guiding principle — OHSU provides and promotes a healthy, safe environment for employees, students, volunteers, patients and visitors.

- We care about the health and safety of members of the OHSU community, OHSU's physical environment, and the environmental impact of our activities on the broader community.
- We uphold all laws and policies related to the safe use of OHSU buildings, laboratory spaces, chemicals, drugs, equipment and products.
- We take the necessary steps and precautions to safely perform our duties and protect our coworkers, students, volunteers, patients and visitors.
- We perform our duties and protect others in the OHSU community by using sound safety practices, including coming to OHSU free from the influence of alcohol or any illegal drugs.
- We support OHSU's programs that promote healthy lives by encouraging chemically dependent employees and students to enter treatment.
- We promote a healthy environment by following the Tobacco Free policy and abstaining from smoking or using other tobacco products at OHSU.

Section J

Fiscal Responsibility and Billing Principles and Standards

Guiding principle — OHSU is accountable for the money and other resources it receives for patient care, research, and education.

- We will adhere to applicable laws and OHSU policies as we protect, spend and properly account for money and resources with which we are entrusted.
- We do not make or accept payments or decisions that others may view as a bribe, kickback or inducement to influence a decision, such as the purchase of products or services, or which may affect the flow of referrals to or from OHSU clinical facilities.
- We will abide by federal law, OHSU policy and regulatory agency rules in expending and accounting for grant and contract funds.
- We maintain adequate internal controls and procedures for accurate financial reporting, stand behind our financial reports and regularly reassess our internal control structure.
- We review and certify our financial reports at both the school/unit level and the executive level.
- We specifically hold those executives responsible for financial reports to the highest ethical standards and provide clear expectations related to their roles and responsibilities in preparing financial statements.

Preventing and Detecting Fraud, Waste and Abuse at OHSU

A number of federal and state laws are designed to prevent and detect fraud, waste and abuse in government health care programs. Those laws provide for criminal and civil penalties if claims are submitted based on or including false information. They also provide protection for those who report concerns about violations of the law. Those laws include the federal False Claims Act. (See section L of the Code of Conduct for the link to the

False Claims Act)

Consistent with these laws, OHSU has in place policies and procedures to make sure that no violations of the law occur. The policies and practices described in this Section of the Code are intended to prevent and detect fraud, waste, and abuse. Section L of the Code sets out the protections for employees who report concerns about violations of the law.

Guiding principle — OHSU bills only in accordance with applicable laws, third-party payer requirements, and fair and ethical billing practices.

- We only bill for services actually rendered. We accurately code these services to ensure both proper billing and the integrity of the appropriate databases.
- We accurately charge for the health care services we provide, and we comply with all federal, state, and private payer requirements. Our documentation supports our payment requests.
- Our bills are based on substantiating documentation. We understand that if we do not provide the appropriate documentation, the assumption is the service has not been rendered.
- We base patient bills on federal, state, and third-party payer requirements, as well as fair and ethical billing practices.
- In our processes we conform to policies regarding prior authorizations, contractual allowances, bad debt practices, collection methods, recognized billing practices, and other applicable laws and guidelines.
- We refer billing questions or discrepancies to the appropriate office to promptly resolve the issue and to provide the resolution response to the requestor in terms the requestor can readily understand.
- We do not engage in unlawful or inappropriate billing practices such as misrepresenting a diagnosis to justify services, unbundling charges to enhance payment, billing for services that are not medically necessary, or any other form of false billing.

OHSU Integrity, the Federal False Claims Act, and You

OHSU takes fraud and waste seriously. The following is information about federal and state laws designed to prevent and detect fraud and abuse in federal health care programs, remedies & responsibilities under such laws, and protections available to anyone who reports concerns about fraud, waste, or abuse.

The OHSU Board of Directors adopts OHSU policies for preventing and detecting fraud, waste, and abuse as set out in the OHSU Integrity Program Roles & Responsibilities and Program Elements document and in Section I of the Clinical Compliance Program document located at <http://www.ohsu.edu/xd/health/integrity/index.cfm>.

Federal False Claims Act (FCA)

What it Does:

- Allows a civil action to be brought against a health care provider who:
 - Knowingly presents or causes to be presented, a false or fraudulent claim for payment or approval to any federal employee;
 - Knowingly makes, uses, or causes to be made or used, a false record or statement to get a false or fraudulent claim paid; or
 - Conspires to defraud the government by getting such a claim allowed or paid.
- Some examples of false claims:
 - Billing for a procedure knowing that the procedure was not performed;
 - Knowingly billing multiple times for the same procedure;
 - Knowingly billing for a higher level procedure than the procedure actually performed; and
 - Purposely failing to report excess or improper payments received.

Remedies for Violation of the FCA:

- A false claims action may be brought by the federal government.
- An individual may file a qui tam (“whistleblower”) false claims action.
- A violation of the FCA is punishable by a penalty between \$5,500 and \$11,000 per false claim, plus 3 times the damages incurred by the government.
- An FCA claim must be made within 6 years of the violation.

Oregon Law: Under Oregon law, a provider commits a crime if the provider knowingly submits a claim for health care payment to which the provider is not entitled. Oregon law also prohibits knowingly submitting false, duplicate, or previously-reimbursed claims to Medicaid and accepting Medicaid payment for services not actually provided.

Protections for Whistleblowers: Federal and state laws prohibit punishing, disciplining, discriminating or retaliating against an employee because the employee reports or discloses information about false claims or initiates or assists in a false claims action. An employee who believes he or she is the victim of unlawful discipline, discrimination, or retaliation may file a complaint with the Oregon Bureau of Labor and Industries.

What you should do if you think OHSU may have made a False Claim:

- If you learn of a bill or payment request that seems improper or appears to be a false claim, you should promptly:
 - Report the situation to your supervisor, manager, or other superior, an Integrity Officer, or call the Integrity Program Hotline (see reporting procedures in [Section L](#) of this Code of Conduct).
 - You may report the concern directly to the Federal Department of Justice.
 - Section L of this OHSU Code of Conduct contains additional resource information and links to websites that present more information about the FCA and OHSU policies.

Section K Business and Legal Principles and Standards

Guiding principle — OHSU maintains the highest ethical standards in its business and legal arrangements and maintains a high level of accountability and stewardship for the responsible use of resources.

- We are responsible not only to those we educate and care for, but also to the individuals and organizations that provide funding. OHSU’s public mission reflects our accountability to the citizens of Oregon.
- We conduct our business operations in a manner that complies with applicable laws and regulations, and that merits the trust and respect of those we serve.
- We fairly and accurately represent our services and responsibilities to the public.

Conflict of interest

Guiding principle — OHSU recognizes the potential benefits of its employees’ participation in outside activities that may advance the welfare of the community, the university, and the employee.

- Because we support OHSU’s mission and values, we will conduct our outside activities in a manner that is consistent with the well-being of the university.

- Where we are personally involved in outside activities, we will consult OHSU policies, procedures and the appropriate individuals to identify, disclose and resolve potential conflicts of interest that those activities may have with our role at OHSU.
- If we are involved in evaluating and managing the disclosed outside activities of other OHSU employees, we will do so in a way that respects academic freedom and that follows the OHSU Conflict of Interest guidelines. Note: For more information see the [Conflict of Interest](#) web page.

Contracts

Guiding principle — OHSU is fair and ethical in its contracting practices and follows its policies and fair business practices.

- We fairly and accurately represent OHSU’s services and responsibilities to the public. We observe fair business practices in our marketing services, activities using marketing materials that accurately reflect OHSU’s skills and accreditations. We select services on the basis of quality, effectiveness, economy and appropriateness, and design them to meet identified needs while also seeking to avoid unnecessary expense. We employ fair business practices in negotiating, our contracts and making our purchases prior to execution or purchase.
- We understand that only certain OHSU representatives have authority to obligate OHSU under contracts. We contact and work with the OHSU’s Logistics and Legal Departments to assure proper contract language and signature authority for all contracting. Only those individuals with appropriate authority sign contracts.
- We do not fix prices, divide geographic markets, or make any agreement that may artificially raise the prices of OHSU services or otherwise impede competition.
- We seek advice from our supervisors, managers, or department heads, or OHSU legal counsel if we have any questions about business practices.

Gifts

Guiding principle — OHSU receives gifts from a variety of sources. Gifts provide critical support for the university’s missions and make possible our innovative health care, education, research, and outreach activities. OHSU Foundation and Doernbecher Children’s Hospital Foundation are two organizations that have been legally established to accept gifts on behalf of OHSU. While OHSU is grateful for the gifts it receives, OHSU must diligently avoid any real or perceived conflict of interest, or the perception of unfair advantage.

- We follow OHSU policy and use good judgment before soliciting or accepting gifts so our actions do not compromise or appear to compromise our professional integrity or the integrity of OHSU.
- OHSU schools, units, divisions and departments only accept gifts that support one or more of OHSU’s core missions and that do not unduly influence or appear to unduly influence the unit’s activities or decisions. (See [OHSU Chapter 10 policies](#).)
- We do not personally accept gifts from vendors or others who may have a business interest in OHSU. (See [OHSU Policy 10-01-025](#).)

Inside information

Guiding principle — In the course of doing business, OHSU creates and receives information that could directly affect the success of its business ventures or those of its current or prospective business partners. If used, this information also could unduly benefit individuals who have access to that information. OHSU depends on the ethical business practices and personal integrity of its employees to protect this information from inappropriate use and disclosure.

- We will not use, directly or indirectly, inside information for personal gain or the gain of others.

- We will protect information entrusted to OHSU by current and prospective vendors, referral sources, contractors, service providers and others. We will use appropriate precautions when transmitting confidential information electronically.

Physical property

Guiding principle — OHSU’s physical property includes property that is owned by or entrusted to OHSU, office and departmental furnishings, equipment and supplies, vehicles, cash, reports, and records, including clinical and billing records in department offices, computer software, electronic files and data, patents, trademarks and service marks, research data, and records and facilities.

- We diligently protect OHSU’s property and the property of patients, research participants, students, employees, contractors and others who work or are being served at OHSU’s facilities.
- We dispose of supplies, obsolete items, discontinued equipment and other OHSU property in accordance with university policies.

Computer and telecommunication resources

Guiding principle — OHSU’s computer and telecommunication networks are university resources that are provided to employees, students, and volunteers to allow them to transact the business of OHSU. As with all university property, OHSU and those who use the computer and telecommunication networks are collectively and individually responsible for the appropriate use of these resources.

- While OHSU permits incidental personal use of computer and telecommunications resources, we do not allow that use to interfere with our jobs. (See [OHSU Acceptable Use Policy 11-20-010](#)).
- We do not use computer and telecommunications resources for personal commercial purposes or financial gain, nor do we use them to access or distribute material that may be offensive to others. (See [OHSU Acceptable Use Policy 11-20-010](#)).
- We exercise extreme care to keep the OHSU network free from computer viruses.
- We follow all OHSU policies pertaining to confidentiality and acceptable use of computing resources.
- We only use our personal logins when accessing systems and do not share or use our usernames and passwords with others.
- We protect restricted (proprietary, confidential, and classified) information that is maintained by OHSU including patient healthcare information.

Section L

Asking Questions or Reporting Concerns About Improper Behavior

Guiding principle — OHSU encourages and supports an environment where its community members may ask questions about integrity issues and report concerns in a safe, nonthreatening atmosphere.

- We understand our obligation to promptly report questions or concerns about improper conduct to an appropriate OHSU employee following the reporting procedures outlined in this section of the Code of Conduct.

Guiding principle — OHSU’s commitment to fostering a climate of integrity is reflected in its policies and procedures, the many ways it provides for people to ask questions and report concerns, and by the

prohibition against retaliation or retribution.

- We are familiar with the policies and procedures that are relevant to our responsibilities at OHSU. If we have concerns about improper conduct we follow OHSU's reporting process. We welcome the opportunity to listen and respond to the concerns raised by others. If someone raises an uncomfortable question, we address the question as appropriately as possible or seek assistance from others who may help.

Reporting policies and provisions

- OHSU's Integrity Office outlines roles and responsibilities for promoting a culture of integrity, including reporting concerns and prohibiting retaliation or retribution.
- OHSU's policies support both institutional and personal integrity and ethical behavior throughout the OHSU community.
- OHSU contracts with an outside company to provide an Integrity Hotline for the OHSU community. The Hotline provides a confidential and anonymous way to ask questions or report concerns. OHSU integrity officers may also be contacted to share a confidential or identified report.

Reporting procedures

1. If appropriate and you are comfortable doing so, talk to the individual(s) involved.
2. If you are not comfortable talking to the individual(s), discuss the concern with your supervisor, manager, or a faculty member who is close to the situation and best able to help.
3. If you are uncomfortable discussing certain questions or concerns with your supervisor, manager, or a faculty member, or if you have already done so and the situation remains unresolved, you are encouraged to discuss the issue with a higher level of authority, such as a department head or administrator.
4. You also may discuss the concern with a representative from the Human Resources, Legal, or Affirmative Action & Equal Opportunity departments.
5. If you do not feel comfortable with any of these steps, you may call the OHSU Integrity Hotline or one of the Integrity Office staff listed in this section. Although these calls are not recorded, the information is used to respond to callers' concerns, investigate the issues, and track the types of concerns in order to identify ways to improve the culture of integrity at OHSU.

Types of reports

- **Anonymous:** The person taking your report cannot identify you. You will be given a tracking number. To ensure anonymity, use the Integrity Hotline to report your concern.
- **Confidential:** The person taking your report can identify you. You may request that certain other people do not learn of your report, but there may be legal limitations to this confidentiality.
- **Identified:** You provide your name and agree to allow the person taking the report to use it.

OHSU Integrity Office contacts

Jennifer Ruocco, PhD , Chief Corporate Integrity Officer.....	503 494-5589
Ronald Marcum, MD, MS, FACOG , Director of Information Security....	503 494-1710
John Rasmussen , Chief Information Security Officer.....	503 494-8480
Mike Matthews , Clinical Compliance Officer.....	503 494-6113
Bobbie Clawson , Clinical Compliance Officer.....	503 494-6806
Kara Drolet, PhD , Integrity Manager, IRB co-chair	503 494-6727
Nikki Bishop , Integrity Education Manager	503 494-0913
John Burnham, PhD , Director EHRS	503 494-7795
Kathryn Schuff , IRB Chair.....	503 494-1685
E-mail.....	marcumr@ohsu.edu
Mailing address....	mail code L106 IO, 3181 S.W. Sam Jackson Park Road, Portland, Oregon 97239-3098

**OHSU
Integrity
Hotline**

Report a
concern by
telephone or
online

877 733-8313
(toll-free)

<http://www.ohsu.edu/integrity>

(24 hours/day;
7 days/week)

Prohibition against retaliation or retribution

Guiding principle — OHSU fosters a culture of institutional integrity where our OHSU community continually strives to do the right thing. It is only possible to maintain such a culture if all members of the OHSU community accept personal responsibility for reporting concerns, appropriately acting upon concerns that are reported, and suggesting preventive measures and improvements to avoid future problems.

- We encourage reporting of questions and concerns and do not retaliate against those who in good faith report a concern.
- We view reporting as a positive action. Each of us is open to addressing concerns raised, and we treat uncomfortable questions or criticism appropriately, seeking assistance or advice whenever necessary to address and resolve issues.
- We understand that acts of retaliation are subject to discipline.

Expectations during an investigation

Investigations and audits are part of our operating environment. In some cases, government investigators or individuals presenting themselves as government investigators, may contact OHSU personnel at work, during non-work hours or at home. Employees have the right to contact legal counsel before responding to any questions from an investigator. However, OHSU personnel must:

- Never destroy or alter any OHSU document or record in anticipation of a request for the document or record by the government, an outside agency or court.
- Never lie or make false or misleading statements to any investigator.
- Never attempt to persuade any other person to provide false or misleading information to an investigator, or fail to cooperate with an investigation.

During normal work hours, attorneys in the OHSU Legal Department are available at 503 494-5222. Outside normal work hours an OHSU attorney is available by calling the OHSU operator at 503 494-8311, stating that government investigators are present and requesting information, and asking the operator to contact an OHSU attorney.

Additional resources

Telephone numbers

Affirmative Action & Equal Opportunity Department.....	503 494-5148
Center for Ethics in Health Care	503 494-4466
Community Relations Department.....	503 494-4240
Employee Assistance Program.....	800 327-2255, or in Portland 503 228-3223
Employee Communications Line.....	503 494-1400
Employee Wellness Program.....	800 941-5590
Environmental Health and Radiation Safety	503 494-7795
Ethics Consult Service.....	503 494-4466
Government & Community Relations Department.....	503 494-6629
Health Information Management Services.....	503 494-8556
Hotline	877 733-8313
Human Resources Department.....	503 494-8060
Legal Department	503 494-5222
Managed Care Contracting Department.....	503 494-1050
Marketing & Communications.....	503 494-2834
Media.....	503 494-8231
Office of Information Privacy and Security	503 494-8849
OHSU Integrity Office	503 494-8849
Patient Advocate	503 494-7959
Public Affairs.....	503 494-5166
Public Safety – Emergency Reporting Hotline	503 494-4444
Public Safety – Nonemergency Incident Reporting Hotline.....	503 494-7744

Purchasing and Contracting	503 494-1050
Research Integrity Office	503 494-7887
Research Grants and Contracts.....	503 494-7784
Scientific Integrity Committee.....	503 494-8849
Strategic Communications	503 494-8231
Vice president for Research Development and Administration.....	503 494-1084
Volunteer Services (Doernbecher Children’s Hospital).....	503 418-5376
Volunteer Services (OHSU Hospital).....	503 418-5376

Web addresses

Employee Assistance Program	http://www.mybalanceworks.com/
Employee Health	http://ozone.ohsu.edu/employeehealth/
Employee Wellness	http://www.healthfuture.org/ozone/
Environmental Health & Radiation Safety.....	www.ohsu.edu/services/integrity/ehrs/
False Claims Act.....	www.ohsu.edu/integrity/policies/upload/fca.pdf
OHSU Health System Policies	http://ozone.ohsu.edu/healthsystem/pandp.shtml
OHSU Integrity Office	www.ohsu.edu/xd/about/services/integrity/
OHSU Policies and Procedures.....	www.ohsu.edu/integrity/policies/index.cfm
Public Safety Department.....	www.ohsu.edu/pubsafety/
Research Development and Administration	www.ohsu.edu/ra/respolicies.shtml

Regulatory Guidance

Centers for Medicare and Medicaid Services	http://www.cms.hhs.gov/
Department of Health and Human Services.....	http://www.hhs.gov/
Food and Drug Administration (FDA).....	http://www.fda.gov/
The Joint Commission (JC)	http://www.jointcommission.org/
National Institutes of Health	http://www.nih.gov/
Office of the Inspector General (OIG)	http://www.oig.hhs.gov/
Office for Human Research Protections (OHRP)	http://www.hhs.gov/ohrp/
Oregon Department of Human Services – Office of Medical Assistance Programs (OMAP)...	http://www.oregon.gov/DHS/healthplan/index.shtml

Code of Conduct Questions & Answers

General

Q1: What will happen to me if I violate this Code of Conduct?

A1: You are subject to disciplinary action, up to and including dismissal if you violate the OHSU Code of Conduct.

Q2: What other OHSU policies apply to me?

A2: Some or all of these may apply to you.

The OHSU Integrity Program Roles and Responsibility and Program Elements

The OHSU Roles and Responsibility in Research

The OHSU Clinical Compliance Program

The OHSU Policy Manual

The OHSU Health System Policy Manual

Q3: I have a specific concern. Should I call the OHSU Integrity Office right away?

A3: You are welcome to contact the OHSU Integrity Office (See Section L of the Code of the Conduct).

However, you may also wish to use the reporting process and procedures described in Section L.

Q4: What happens when I call an Integrity Officer?

A4: The Integrity Officer will ask you to provide information about your concern, address your questions, and may initiate an investigation.

Q5: Will my call be recorded or traced?

A5: No. Integrity Officers do not record or trace calls, but they will take notes if they need to investigate the situation. In addition to responding to your questions and investigating your concerns, the Integrity Office keeps a record of the types of calls received in order to identify opportunities for system-wide improvements.

Q6: Do I need to identify myself when I report a concern?

A6: No. To make an anonymous report, please call the toll-free reporting Hotline (877 733-8313). You may also make a report to an OHSU Integrity Officer; however, Integrity Officers may be able to determine your identity via caller-ID displays. Sometimes an Integrity Officer will advise you that knowing your identity will be helpful in investigating your report or that confidentiality may be limited due to the specifics of your concern. If you decide to give your name, you may request that it be kept confidential. Your request will be respected to the extent allowed by law.

Q7: Will I be told whether my concern was investigated and the outcome of any investigation?

A7: You will receive follow-up information from any Integrity Officer who is investigating your concern. However, this follow-up may be limited to advising you that the investigation is complete due to OHSU's obligation to protect the confidentiality of all parties involved.

Q8: What happens when I call the Hotline?

A8: If you request anonymity, Hotline employees will give you a tracking number and a call-back date. Hotline employees will be able to identify you only by this number; no one at OHSU will know your identity. If you request confidentiality or identify yourself, someone from OHSU may contact you about your report. In all cases, the OHSU Integrity Office opens an investigation into your report. Progress reports are forwarded to the Hotline staff according to the assigned call-back date. When the OHSU Integrity Office concludes an

investigation or receives a final resolution report from an Integrity Officer, the resolution is reported to the Hot-line staff for your information.

Q9: Can my supervisor or employer retaliate against me for calling an Integrity Officer?

A9: No. If you believe that you are being subjected to retaliation, you should call an Integrity Officer again. A member of the OHSU community who engages in retaliation is subject to discipline up to and including termination of his/her relationship with OHSU.

Q10: What should I do if my supervisor has told me not to worry about a concern that I have raised and I am not satisfied by my supervisor's explanation?

A10: You should follow the reporting procedure described on Section L or call an Integrity Officer.

Q11. What should I do if a law enforcement officer, attorney, or government official asks me about the activities of my department or those of a co-worker?

A11. Contact the OHSU Legal Department. An attorney will assist you. Whether you are contacted at work or at home, you are not required to discuss these matters without legal advice. You may also contact the Integrity Office. (See Section L of the Code of Conduct for telephone numbers).

Q12. What do I do if I receive a subpoena involving OHSU?

A12. Promptly call the OHSU Legal Department for assistance. You may contact Risk Management for subpoenas relating to liability claims. (See Section L of the Code of Conduct for telephone numbers).

Section A: Professional Principles and Standards

Q1: Who is a professional at OHSU?

A1: All OHSU employees are professionals in their respective positions. Professional conduct includes the responsibility that each employee has to approach his or her job with the highest sense of integrity. The Code of Conduct provides the framework for professional conduct for all OHSU Members.

Q2: What types of professional standards apply to OHSU?

A2: Many organizations, associations, agencies, and laws express standards that apply to specific professionals who work at OHSU. For example, many health profession associations have adopted codes of ethics that apply to their professionals. Similarly, these professions are governed by federal and state laws. The OHSU Code of Conduct, together with the legal and ethical expectations of the individual professions, set the professional standards for OHSU employees.

Q3: Is it OK for my supervisor to set department policies or procedures that contradict OHSU's policies?

A3: No. OHSU's policies set the overarching guidelines for the business of OHSU and for those who work for the university. Departmental policies may address specific situations that are unique to the department or work unit, but they cannot contradict OHSU policies (see OHSU policy [01-01-001\(1\)](#)). Periodically OHSU revises its institutional policies to address new issues or to provide additional clarification.

Section B: Patient Care Principles and Standards

Q1: If I see a colleague about to make a medication dosage error, what should I do?

A1: Immediately talk to the individual or take other steps to prevent the error. Because these errors are often system errors, you should also report this to your manager or supervisor so he or she can report it to Quality Assurance. You may also report this error directly to Quality Assurance. If you are a student or resident, you should also report it to a faculty member. Reporting errors can help OHSU implement safer systems. You may also follow the reporting procedures described in Section L of the Code of Conduct.

Q2: I believe a colleague may have made an inaccurate note in a patient chart. What should I do?

A2: Ask your colleague to clarify the note to ensure the patient's chart contains accurate information. OHSU amends health care records in accordance with established procedures when necessary to correct an error or include an addendum, providing more complete documentation. You may also follow the reporting process described in Section L of the Code of Conduct.

Q3: I made a clinical error that has harmed my patient. What should I do?

A3: We value honest communication with our patients and this patient must be advised of the mistake. To assist you in doing this, you should immediately contact the Risk Management Department, which will assist you in providing factual information to the patient and OHSU's remediation of the error. The patient needs to receive this information in a clear and understandable way. The details of how and why this occurred may be reserved for a later discussion after all the facts are known. See [Disclosures of Serious Events, Errors and Near Misses](#).

Q4: I overheard a co-worker tell an acquaintance who is not involved in a patient's care the results of that patient's HIV test. What should I do?

A4: Your co-worker should not share this information with anyone who is not involved in the patient's treatment or the administrative aspects of care at OHSU. If you feel comfortable doing so, you may discuss this breach of patient confidentiality with your co-worker. Otherwise you should follow the reporting process described in Section L of the Code of Conduct. This is a serious breach of sensitive and personal patient information and we are committed to correcting and preventing these types of violations.

Q5: My daughter needs to have a minor procedure performed and will need a prescription afterwards. This is within my scope of practice. Can I perform the treatment?

A5: No. There are many ethical reasons why health care providers should not treat family members. OHSU policy prohibits this unless it is an emergency situation or isolated setting where there is no other qualified provider available. See [Health Care Professional Conduct](#).

Section C: Research Principles and Standards

Q1: May I accept a "finder's fee" for recruiting research participants?

A1: No. These types of incentives violate federal laws and OHSU policy. Funds that are accepted for research activities must be associated with the actual costs of performing that research (see <http://www.ohsu.edu/integrity/policies/research.cfm>).

Q2: If I have questions about conducting research, with whom should I speak?

A2: You could contact your mentor or department chairperson. The Research Integrity Office staffs the Institutional Review Board (human participants), the Institutional Animal Care and Use Committee (animal subjects), the Conflict of Interest in Research Committee, and the Institutional Biosafety Committee. Additionally, you may contact the Office of the Vice President for Research Development and Administration, or visit the [Research Development and Administration](#) Web site. Section L of the Code of Conduct for additional telephone numbers and Web addresses.

Q3: Can I make an anonymous report of scientific misconduct?

A3: Yes. Sometimes, however, the process of investigating the allegation may be less effective if you are not willing to identify yourself to a member of the Scientific Integrity Committee or the Vice President for Research Development and Administration. Those who report scientific misconduct are protected by safeguards that include confidential treatment and a prohibition against retaliation (see Section L of the Code of Conduct). It is important that OHSU's entire scientific community take responsibility for addressing scientific misconduct (see OHSU policies [04-15-005](#) and [04-15-035](#)).

Q4: I want to send questionnaires to my colleagues at OHSU and across the country to find out how they perform a particular procedure and how successful their method has been. Do I have to have my project reviewed by the IRB?

A4: Maybe. If you are going to analyze the results as part of a research project, you must have the protocol, questionnaires, and consent forms reviewed prospectively and approved by the Institutional Review Board. The Institutional Review Board will determine the level of review required for your protocol. Contact the Research Integrity Office or visit the Web site at <http://www.ohsu.edu/xd/research/about/integrity/irb/index.cfm> for more information. (See Section L of the Code of Conduct for telephone numbers).

Q5: A patient in my unit who has diminished capacity to consent seemed to have trouble understanding a research protocol procedure. What should I do?

A5: The principal investigator (PI) must be sure research participants clearly understand and consent to research procedures. (See <http://www.ohsu.edu/xd/research/about/integrity/irb/index.cfm>). If a research subject lacks capacity to consent to research participation, then a suitable legally authorized representative must consent for him or her and the subject must assent. If the subject dissents he or she must not be enrolled in the protocol. If you have concerns about the process used to obtain informed consent, talk with the PI. If you already have spoken with the PI and you still are concerned, follow the reporting procedures described in Section L of the Code of Conduct.

Q6: Can I accept research sponsorship from a pharmaceutical company that requires the company's approval before I publish or present my research results?

A6: No. OHSU values professional integrity and academic freedom. The University will not agree to a restrictive contract that might prohibit publication or the accurate description of the research results. While the company may place reasonable restrictions on the timing of releasing results, it may not prohibit you from presenting the findings of the research, even if those findings are not advantageous for the company's product. (See <http://www.ohsu.edu/research/rda/rgc/docs/randr.pdf>

Q7: A new postdoctoral fellow is joining my laboratory to work on a project that has been ongoing for several years and does not involve animals or human subjects. Does he need to take OHSU's Responsible Conduct of Research Training?

A7: Yes. In addition to training in the protection of humans and animals in research, this training addresses responsible management of grant funds and intellectual property, as well as information regarding what constitutes scientific misconduct. Some of this information is specific to policies at OHSU and Oregon state laws that are applicable to all research at OHSU.

Q8: I work in an area where animals are being used for experiments and I have some concerns about the way the animals are being treated. To whom should I talk?

A8: Any complaint by personnel regarding possible inappropriate care of animals should be made by submitting a written report of the alleged violation to the Chair of the IACUC, Department of Comparative Medicine (DCM); Department of Animal Resources (DAR) Veterinarian; or the Research Integrity Office Associate Director. Anonymous or verbal reports are also acceptable if sufficient detail is provided to allow adequate investigation of the charges. The report should include a factual description with date, time, location,

animal species, numbers and identifications of animals, personnel involved, and any other relevant details. The complainant's identity will be kept confidential when requested.

Q9: I am consulting for a company and am receiving less than \$10,000 annually for this consulting. Do I need to disclose this activity on my Conflict of Interest in Research (CoIR) disclosure?

A9: No. Only significant financial interests need to be disclosed on the CoIR disclosure form. Receiving income for consulting that totals less than \$10,000 annually is not considered a significant financial interest. However, this activity should be disclosed on your Outside Activities Conflict of Interest disclosure if it is related to your job at OHSU. See <http://www.ohsu.edu/xd/research/about/integrity/coi/glossary.cfm#s> for the definition of significant financial interest and <http://www.ohsu.edu/xd/about/services/integrity/coi/oa/index.cfm> for information on the Outside Activities disclosure policy.

Q10: I want to start using a viral vector in my research project but have never worked with this kind of vector before. What should I do?

A10: Contact the Institutional Biosafety Committee (IBC) to initiate the review process (see <http://www.ohsu.edu/xd/research/about/integrity/ibc/index.cfm>). Review and approval by the IBC will be required before initiating work with the viral vector. The IBC will provide advice on the recommended biosafety precautions for work with the vector. You may also contact the Environmental Health & Radiation Safety Department to consult with the Biosafety Officer for additional advice. See <http://www.ohsu.edu/ /integrity/ehrs/>

Section D: Academic Principles and Standards

Q1: I am a student. I believe a faculty member is being unfair in her judgment of my work. Whom may I talk with about this?

A1: If you are comfortable doing so, talk about your concern with the faculty member. Otherwise, discuss the matter with your school's dean of student affairs or another dean, or follow your school's grievance process. (See OHSU policy 02-30-075). Students also may report concerns by following the reporting procedures in Section L of the Code of Conduct.

Q2: What are some examples of student conduct that would lead to disciplinary action?

A2: An OHSU school may discipline or dismiss students for failure to meet academic or nonacademic standards. (See OHSU policy 02-30-010 and 02-30-050 and individual related school policies). Nonacademic violations include misuse of OHSU records and disruptive or unprofessional behavior, such as cheating or criminal convictions.

Q3: I suspect a student has falsely reported his completed requirements. What should I do?

A3: If you are comfortable doing so, discuss your observations with the student to gain additional insights. If you are not comfortable doing this or you have already done this and you are reasonably sure that this student has made a false report, discuss the situation with a faculty member or appropriate dean to ensure the matter is investigated.

Q4: I am a clinical student at OHSU. I think I need closer supervision to perform a procedure. What should I do?

A4: Talk with the instructor who is responsible for the course or clinic. Students should not perform patient care without appropriate supervision and guidance.

Section E: Confidentiality and Privacy Principles and Standards

Q1: I have overheard conversations on the tram and in the elevators about patients. I know this is a breach of patient confidentiality. How can I help?

A1: If you are comfortable doing so, approach the persons having the conversation and remind them to have their conversation in a private area. If this does not solve the problem or if you are uncomfortable talking to them, you may report the violation to the OHSU Integrity Office (See Section L of the Code of Conduct for telephone numbers).

Q2: I went to dinner with my best friend who works in a different OHSU department. He asked me about the medical status of a well-known Portlander who is currently a patient here at OHSU. How should I handle this? What can I tell him?

A2: Do not discuss the patient or the patient's medical status. You should remind your friend that the privacy of all our patients is important. (See OHSU policies [01-05-012](#) and [01-05-010](#)).

Q3: Can I use e-mail to send patient information to another health care facility?

A3: Maybe. OHSU's e-mail system does automatically encrypt information that appears to be Protected Health Information (PHI). OHSU's e-mail system will also encrypt information if the proper steps are taken. Please consult with someone from the OHSU Integrity Office to discuss how to best send this information. (See OHSU information security policy [01-05-020](#) and directive [ISD-700-00007](#)).

Q4: My department wants to send a card to one of our co-workers who was recently in the emergency room and then admitted to the hospital. Can I use the health record to find out why she was admitted and what room she's in?

A4: No. Looking up information about a co-worker in the health record, whether paper or electronic, is a violation of patient confidentiality and may result in disciplinary action. See OHSU policy [01-05-012](#) and <http://ozone.ohsu.edu/HealthSystems/Adm08InfoSys/Adm08-06.html>

Q5: I want to hand out a birthday celebration schedule in our office. I asked my co-worker his birth date so I could include him on the schedule. He said he didn't want to be included and refused to provide his birth date. Can I ask my manager to check his personnel files and give me the date?

A5: No. This would be an inappropriate use of personal information contained in an employment file. Co-workers may have many reasons for not wanting to be included in holiday or special occasion festivities. Their wishes must be respectfully honored.

Q6: I work with students. Recently a student's mother called to ask about her daughter's grades. Can I give them to her?

A6: The [Family Educational Rights and Privacy Act of 1974](#) (FERPA) does not allow educational institutions to disclose academic and health records of students without the express consent of the student. Generally, student records also are exempt from requests for public records.

Q7: I have a smart phone that takes digital photos and videos. Can I use it to take pictures at work and post the images on Facebook to show my friends where I work?

A7: Maybe. Filming may be done with proper permission. However, as a general rule, it is best to avoid taking personal videos or photos at work and particularly to avoid displaying them on social networks. It is very easy to inappropriately include patients, their information or medical equipment in use in your photo or video and be in violation of regulations or OHSU policy. See [Filming on Campus No. 08-10-020](#) ; [Social and Business Networking on the Internet](#); and [Safety Tips for Using Social Networking Sites](#).

Section F: Intellectual Property Principles and Standards

Q1: Does the university own the rights to academic products I develop such as books, journal articles or other curriculum materials?

A1: OHSU owns all rights to items, products, and inventions developed by OHSU employees while using institutional facilities and resources. Exceptions traditionally are made for articles, books, and curriculum materials not specifically commissioned by the university. Most publishers require transfer of copyright to the publisher, and this is permitted.

Q2: Does the university own rights to products and inventions that are developed from a project funded in whole or in part by a federal grant?

A2: Under current law and policy, OHSU can elect to retain title to inventions and materials that result from federally funded research. Otherwise, ownership reverts to the federal government. See OHSU policy [04-90-001](#) and <http://www.ohsu.edu/research/rda/rgc/docs/randr.pdf>

Q3: I invented a new garden tool that I would like to patent. This was done at home and has nothing to do with my role at OHSU. Do I have to tell anyone at OHSU about this?

A3: No. OHSU policy [10-01-015](#) states that you must disclose outside activities that require you to use the academic, professional, or institutional expertise for which you are employed at OHSU; are conducted at OHSU-owned or OHSU-controlled premises; use OHSU facilities or support; or interfere with your duties to the university. Please refer to the policy for other exceptions and definitions. If you are unclear about a particular outside activity, please contact the OHSU Integrity Office or the OHSU Legal Department or the Technology Transfer and Business Development office with respect to issues regarding intellectual property. (See Section L of the Code of Conduct for telephone numbers.)

Section G: Diversity, Equal Opportunity, and Respect at the University Principles and Standards

Q1. After a long period of time unsuccessfully applying for better positions within my department, I believe I am being treated unfairly and, perhaps, in a discriminatory fashion. What should I do?

A1: This could be a form of discrimination. If you are comfortable doing so, discuss your concern with your immediate supervisor or you may report your concern under the reporting procedures described in Section L of the Code of Conduct. You may also call OHSU's Affirmative Action & Equal Opportunity Department. (See Section L of the Code of Conduct for telephone numbers).

Q2: My manager told me I could get larger pay raises if I agreed to see him socially. I am afraid that he will fire me or give me a smaller raise if I say "no" or report him. What should I do?

A2: This may be a form of sexual harassment and could violate OHSU policy [03-05-035](#) and this Code of Conduct. If you are not comfortable discussing this situation with your manager's superior, you may follow the reporting procedures described in Section L of the Code of Conduct or you may call OHSU's Affirmative Action & Equal Opportunity Department. See the Additional Resources section for telephone numbers.

Q3: One of my co-workers tells jokes that contain ethnic slurs. I have told him that I don't think they are humorous or appropriate at work. Other employees laugh at his jokes, so he says that I'm just too sensitive. What should I do?

A3: You did the right thing by talking to him. This employee's behavior violates workplace laws and OHSU policy [03-05-032](#). Discuss this with your supervisor. If you have already spoken with your supervisor and the situation remains unresolved or if you are not comfortable doing this, please contact the Affirmative Action & Equal Opportunity Department or follow the reporting procedures described in Section L of the Code of Conduct.

Q4: What do I do if someone physically threatens me?

A4: If you think you are in immediate physical danger, how you respond will depend on your location. On OHSU Marquam Hill Campus: Call or ask a co-worker to call Public Safety at 4-4444 and ask “Dr. Strong” to come to a specific location. “Dr. Strong” is the code that indicates physical violence is occurring or imminent. Public Safety will immediately dispatch officers to your location. OHSU facilities off the Marquam Hill Campus: Call or ask a co-worker to call 911. Then, as soon as possible call OHSU Public Safety at 503 494-7744 to report the incident.

Q5: What should I do if I see a colleague or co-worker publicly berating another employee or student?

A5: If you are comfortable doing so, discuss your observations and concerns with the person or follow the reporting process described in Section L of the Code of Conduct.

Q6: A co-worker in my department is not a “morning person.” I think she is rude and abrupt with others. I have already spoken to her about this problem. She says she understands there is a problem but she can’t help it. What should I do?

A6: You could speak with her again and tell her that her morning behavior is a real problem and that she might benefit from contacting Human Resources regarding classes on effective and respectful communication or the services provided by the Employee Assistance Program. If you are not comfortable approaching her again, you could speak with your supervisor or follow the reporting procedures described in Section L of the Code of Conduct.

Q7: I want to date an OHSU employee who appears to be interested in me. I don’t want to violate OHSU policy. Can I ask him out?

A7: Yes. According to OHSU policy [03-05-045](#), OHSU personnel are not prohibited from dating or marrying each other. However, if one of the two individuals has power or authority over the other, the person to whom power or authority belongs must report the existence of the relationship to his or her supervisor and steps must be taken to eliminate the professional conflict, including likely removal of the person with power or authority from any direct oversight of the other individual. The supervisor shall consult with the Director of Affirmative Action & Equal Opportunity and then specify what actions need to be taken to remove conflict.

Q8: During a staff meeting my supervisor told me he was unhappy with a project that I had completed. He was very sarcastic and I was embarrassed. What should I do?

A8: If you are comfortable doing so, talk with your supervisor. Work appraisals and criticism should be provided in a constructive and private manner. If you are not comfortable talking with your supervisor, follow the reporting procedures described in Section L of the Code of Conduct.

Q9: My co-worker regularly comes back late from lunch. I have to cover for him, as well as do my own work. What should I do?

A9: If you feel comfortable, talk with your co-worker about your concern. Otherwise, talk with your supervisor or follow the reporting procedures described in Section L of the Code of Conduct.

Section H: Public Interactions and Political Activities Principles and Standards

Q1: I want to write a letter to the local paper encouraging citizens to vote “no” on a ballot measure. May I use OHSU stationery and sign my name using my OHSU title?

A1: No. Although you may send the letter and sign your name with your professional degrees, you must not use your OHSU stationery or indicate your role or position at OHSU. By including your OHSU title you would give the impression that you represent the university’s position on this particular ballot measure. Only the president of the university and his designees are authorized to represent the university in this way. (See OHSU policy [08-10-009](#)).

Q2: My department would like to write a letter or send an e-mail message to the editor of a local newspaper regarding a political issue that impacts OHSU and our department. Can we indicate that the letter is from our department?

A2: You may do this only if you first consult with Government Relations and they approve the letter or e-mail message. Additionally, Strategic Communications reviews these types of letters and e-mail messages before they are sent to outside media. (See OHSU policy [08-10-001](#)).

Q3: What are the allowable political activities in which an OHSU employee can engage?

A3: Oregon law and OHSU policy set limitation on political activities by state employees. Please refer to the list of prohibited and allowable activities at http://www.ohsu.edu/integrity/policies/upload/260-432_quickref.pdf.

Q4: As an employee, can I volunteer at OHSU?

A4: Although OHSU encourages employees to volunteer, volunteering at OHSU cannot interfere with your normal work responsibilities or be in the department where you work. Volunteer Services coordinates hospital volunteer opportunities for OHSU Hospital and Doernbecher Children's Hospital. In addition, OHSU offers employees many opportunities to work together to support volunteer activities, such as Habitat for Humanity, SOLV, the Salvation Army, the Oregon Food Bank, Race for the Cure, and the annual United Way campaign. Other volunteer activities at OHSU include coat, food, and school supply drives. (See Section L of the Code of Conduct for telephone numbers).

Q5: May I offer to talk to groups about my professional expertise and my work at OHSU?

A5: Yes. The OHSU community is recognized for its expertise. Speaking opportunities such as this help the public understand OHSU's mission and programs. Talk with Community Relations about the OHSU Speakers Bureau, about speaking opportunities in the Portland area, and about your responsibilities when representing OHSU in this way. (See Section L of the Code of Conduct for telephone numbers).

Q6: I am active in my neighborhood association. Can I explain OHSU policies and positions at association meetings?

A6: Maybe. OHSU is officially represented at Homestead and Corbett-Terwilliger/Lair Hill neighborhood associations, both located in southwest Portland. Representatives from Community Relations are also willing to attend other meetings or advise OHSU employees who are involved in their own neighborhood associations. If you are actively involved in an organization that has questions about OHSU policies, check with Community Relations for guidance or assistance.

Q7: A reporter asked me questions about a contract I signed and also requested copies of the paperwork associated with the contract negotiations. Do I have to provide that information?

A7: Maybe. First contact OHSU's Legal Department for advice. As a public corporation, some, but not all, information about OHSU and its services and business practices is a matter of public record that must be disclosed upon request. (See OHSU policy [01-10-001](#)). The university reviews and responds to requests to disclose public records on a case-by-case basis. Handwritten, printed, and electronic documents and communications about any subject relating to OHSU's activities and business, or written while using OHSU resources, may be public records. Some records are exempt, such as medical records; employment, discipline, and faculty performance records; some residency data; certain limited types of proprietary information; and Social Security numbers. Generally, student records also are exempt.

Q8: A reporter asked me if I would agree to an interview about a controversial health care issue. Should I agree to the interview?

A8: Maybe. Contact University News and Publications to discuss the invitation and its implications. If you decide to do the interview, University News and Publications will work with you to make the arrangements, and will provide media training to help you become more comfortable talking on camera and with a reporter.

Q9: I am excited about our newest research results. May I call the newspaper to ask them to publish a story about it?

A9: University News and Publications is responsible for carrying out the university's media relations program and approving all contacts with the media for the purpose of disseminating information that represents or relates to OHSU and its academic, clinical, research, and administrative activities. (See OHSU policy [08-10-001](#)). Therefore, your first call should be to University News and Publications so they can advise you about the options for sharing your information with the public and coordinate media coverage. They also can help you increase the amount of coverage you receive and ensure that reporters respect journal embargoes.

Q10: When someone calls about the condition of a loved one who is hospitalized at OHSU, can I give him or her requested information?

A10: There are privacy rules that apply to patient information. If someone calls asking for this information, you may release the patient's condition described in general terms (e.g., good, fair, or serious) and his or her location in the hospital if the patient has not restricted access to this information (opted out of the hospital directory) and the caller inquires about the patient's name. We are not permitted to communicate specific health information about the patient in this circumstance.

Section I: Personal and Environmental Health and Safety Principles and Standards

Q1: I think someone in my department has a problem with alcohol. He misses a lot of work, often complains about being "hung-over," and sometimes comes back from lunch smelling of alcohol. What should I do?

A1: If you are comfortable doing so, discuss your concerns with the employee and provide information about the OHSU Employee Assistance Program. (See <http://ozone.ohsu.edu/hr/benefits/index.shtml>). If you are not comfortable doing this, you may contact one of the employee assistance or wellness resources listed in Section L or follow the reporting process described in Section L of the Code of Conduct. If this employee's behavior places others at immediate risk, call Public Safety right away. (See OHSU policy [07-30-001](#)). If you are a licensed health care professional, you may have additional professional reporting obligations.

Q2: I am taking a prescription antidepressant that makes me feel "out of it" during the day. This is too personal to discuss with my supervisor, and I don't think she could offer any helpful advice. What should I do?

A2: Some prescription and over-the-counter drugs can have side effects that affect your mood and make you less alert. Some herbal supplements also can affect your mood and thinking and make you less alert. You are not required to discuss your medical or mental health history with your supervisor. However, if this prescription drug is affecting your work, you should discuss this issue with your personal health care practitioner. Employee Health may also be able to offer some advice. If, because of your job, this situation places others at risk, you should contact one of these resources immediately to explore alternatives.

Q3: Can beer and wine be served at a department party after work in an OHSU facility?

A3: Maybe. Refer to OHSU policy [07-90-025](#), and then obtain appropriate permission and clearance as specified in that policy. You may contact Risk Management or Public Safety to help ensure maximum safety for your event. (See Section L of the Code of Conduct for telephone numbers). In addition, you should keep in mind there may be individual and institutional liability if someone at the celebration becomes intoxicated and then drives.

Q4: When I began work at OHSU I found several unlabeled bottles and containers left in the lab. I don't know what they contain. Should I pour the liquid down the drain?

A4: No. Some containers may contain hazardous materials. Contact Environmental Health and Radiation Safety at 503 494-7795 to have a qualified person collect the containers for appropriate and safe disposal. (See <http://www.ohsu.edu/integrity/ehrs/>)

Q5: A co-worker frequently does not use the sharps disposal container to dispose of used needles. What should I do?

A5: If you are comfortable doing so, talk to your co-worker about this risky behavior. You also may report this type of incident to your supervisor or directly to Environmental Health and Radiation Safety at 503 494-7795 or follow the reporting process described in Section L of the Code of Conduct to have this issue resolved before someone is injured. (See <http://www.ohsu.edu/integrity/ehrs/>).

Q6: My office is next to a research laboratory. A strong chemical odor comes through the air vent. What should I do?

A6: Please alert your supervisor who will contact Environmental Health and Radiation Safety at 503 494-7795 to have a qualified person evaluate the situation. He or she will determine the source of the odor and work to correct the situation. (See <http://www.ohsu.edu/integrity/ehrs/>).

Q7: I work for OHSU at night. A few of the lights are burned out on the walkway I use to get to my car. I don't feel safe walking by myself. What can I do?

A7: How you request assistance depends on where you work.

On Marquam Hill Campus: Call 503 494-8054 to report the burned out bulbs. Until they are replaced and you feel safer, you may call Public Safety at 503 494-7744 to ask for an escort to or from your vehicle.

On West Campus: Your building administrator for building and grounds maintenance should be able to assist in replacing the lighting or you may call the maintenance dispatcher at 503 494-8054. Call OHSU Public Safety at 503 494-7744 to request assistance contacting the onsite security personnel.

In OHSU buildings that are not located on either Marquam Hill or West campuses: Check with your building administrator for building and grounds maintenance or call the maintenance dispatcher at 503 494-8054 for assistance replacing the lighting. Until the lighting is repaired, walk to and from your vehicle with other co-workers. Call 911 to report suspicious activity or vehicles. If you are in your car and feel threatened, stay in your car and use a cellular telephone to call 911 or drive to a populated, lighted area for assistance.

Q8: I am a new manager at OHSU and have questions concerning what safety training is available for my staff. Whom do I contact?

A8: All occupational health and safety training at any OHSU worksite can be coordinated by contacting Environmental Health and Radiation Safety at 503 494-7795.

Section J: Fiscal Responsibility and Billing Principles and Standards

Q1: A patient I am treating lives a long distance from Portland and does not like to travel to OHSU. Can I refer her to a non-OHSU clinic in her community?

A1: You may do so as long as you or your family members have no financial interest in the other clinic and you are not receiving any type of compensation for the referral. (See OHSU policies [10-01-001](#) and [10-01-020](#)).

Q2: Can I use grant funds to purchase airline tickets to Atlanta for myself and my spouse?

A2: Maybe. This depends on whether the travel is related to the research and is permitted in the grant. You may not use grant or other OHSU funds to pay for travel for a domestic partner, spouse, or family member unless they are part of the approved research protocol personnel (See OHSU policies [04-40-001](#) and [04-40-020](#)).

Q3: I think a charge processing or billing error has been made? What should I do?

A3: Immediately notify your supervisor or other appropriate person who has billing responsibilities or follow the reporting process described in Section L of the Code of Conduct. Billing errors, whether they result in overpayment or underpayment, must be resolved and the circumstances that created the error must be corrected.

Section K: Business and Legal Principles and Standards

Q1: I believe a director is violating OHSU policies related to purchasing and contracting. The director is in a powerful position and would be very upset if I question these practices. What should I do?

A1: No one at OHSU is exempt from the university's policies or this Code of Conduct. If you have good reason to believe that someone is violating acceptable practices, talk with that person's supervisor. If you are not comfortable doing that or if you have done this before and the situation is unchanged, you may talk with the OHSU Integrity Office or follow the reporting procedures in Section L of the Code of Conduct. These reports may be confidential or anonymous.

Q2: I think one of my co-workers is taking office supplies home for her spouse to use for personal business. What should I do?

A2: If you are comfortable doing so, talk privately with your co-worker. If you are not comfortable doing this, talk to your supervisor or follow the reporting procedures in Section L of the Code of Conduct. (See OHSU policy [03-25-080](#)).

Q3: May I take a part-time or consulting job while I am employed by OHSU?

A3: Probably. There may be no restrictions if the second job does not create a conflict of interest or prevent you from effectively performing your job at OHSU. You may have to disclose and obtain approval for an outside job depending on your role and position at OHSU. For complete information about outside activities, refer to OHSU policies [10-01-001](#) through [10-01-035](#) or visit <http://www.ohsu.edu/integrity/coi/oa/index.cfm>

Q4: May I hire my daughter to work in my department during the summer?

A4: Maybe. OHSU does not discriminate in its employment of individuals. You cannot hire a family member into a position over which you have supervisory responsibilities without the prior approval of the Human Resources Department. For more information, refer to OHSU policy [03-05-040](#).

Q5: Can I accept an invitation to be a guest lecturer at another institution, which includes travel reimbursement and an honorarium?

A5: Yes. OHSU Outside Activity policy [10-01-015](#) allows you to accept expense reimbursement and a modest honorarium as long as the activities do not interfere with your duties and obligations to the university. If you are a clinical care provider and the sponsor is someone to whom or from whom you obtain referrals, please seek assistance from the Legal Department or the OHSU Integrity Office before accepting the invitation.

Q6: Can I refer business, clinical research trials, research grant applications, or patient care away from OHSU to other persons or organizations?

A6: Sometimes there is a legitimate reason for referring outside OHSU. For example, a patient may have to be referred to another hospital if OHSU does not offer the required health care services. However, referring business outside OHSU could violate OHSU's Conflict of Interest policy [10-01-020](#). If you are uncertain, please contact your department director or an integrity officer. See Section L of the Code of Conduct for resources and telephone numbers.

Q7: Can I obtain goods or services for OHSU from a business in which my relatives, friends, or I have a direct interest?

A7: Maybe. Such a contract must go through the normal competitive bidding process. You would not be allowed to make or influence the final decision about vendor selection. For additional information, refer to OHSU policies 05-01-025 and [10-01-020](#).

Q8: I am a clinician at OHSU. A managed care organization sent a revised contract for me to sign. Should I sign it?

A8: No. Send the contract to the Managed Care Contracting Department. (See Section L of the Code of Conduct for telephone numbers). Authority to sign contracts on behalf of OHSU is limited by policy to specific Departments and individuals for good reasons. Sometimes such a contract will include inappropriate or obligatory language that OHSU does not endorse. Managed Care Contracting will ensure you and OHSU are protected and are not obligated to abide by inappropriate or unethical contract terms.

Q9: I am an office manager. A local supplier is offering to provide office supplies at a reduced cost if I sign a purchasing contract for one year. This would save our department and OHSU a lot of money. Should I sign the contract?

A9: No. This contract may violate existing contracts with other suppliers. Also, you may not have authority to sign such a contract. (See OHSU policy [01-50-001](#)). Send the contract to the Purchasing and Contracting Department (mail code 354) for assistance.

Q10: I noticed a departmental contract that was signed by an employee who does not have authority to do so. What should I do?

A10: Advise your supervisor or manager. He or she, with assistance from the OHSU Legal Department, will investigate and take any additional, appropriate actions. The person who signed this contract could be held personally responsible for the cost of the contract if he or she does not have authority to sign OHSU contracts. (See OHSU policy [01-50-001](#)).

Q11: I work in a unit that just purchased new, up-to-date therapy equipment. The vendor will be here next month to train staff on how to use the equipment safely. They expect the training to last six hours with a break for lunch. Can my unit accept the vendor's payment for lunch?

A11: Maybe. Vendors who wish to help sponsor educational events at OHSU may provide unrestricted funds to the department, division, school, or unit. The institution may then use those funds to help defray any of the costs associated with the event, including the purchase of food. The vendor's support may be gratefully acknowledged at the event.

Q12: A vendor for my department is offering to sponsor a conference and provide lunch for all the attendees. May we accept this offer?

A12: Maybe. As long as the agenda serves as genuine education, the vendor does not control the agenda or the faculty, and the vendor provides the sponsorship via an unrestricted grant or fund to the department, this would be allowed.

Q13: May I accept a palm pilot or a computer as a gift from a company that is a vendor or that wishes to be a vendor of OHSU?

A13: No. Accepting this gift would violate Oregon law, OHSU policy, and various professional ethical standards.

Q14: A potential contractor who is bidding on a contract for OHSU has offered me two box seats for an upcoming Blazer's game. Can I accept these tickets?

A14: No. Per Oregon law and OHSU policy, gifts of entertainment are prohibited without regard to the value of the gift. [You may purchase the tickets individually for a price equal to the fair market value of the tickets.]

Q15: A grateful patient brought a tray of cookies to the unit. May I accept this gift?

A15: Yes. Gifts of nominal value may be graciously accepted.

Q16: A friend who works at a local hospital thinks that a vendor is charging them more than the vendor charges OHSU for the same product. Can I tell him how much our department pays for this product?

A16: No. Many variables affect pricing. This information is proprietary to OHSU. Also, divulging it may breach OHSU's contract with the vendor. (See [Chapter 5](#) of OHSU's online policy manual.)

Q17: Can I start my own business using confidential or other inside information I've obtained while working for OHSU?

A17: You must obtain approval before using this type of information to begin your own business. (See [Chapter 5](#) of OHSU's online policy manual and OHSU policy [04-50-001](#)).

Q18: I was not involved with a contract in my department. I know about another company that could probably provide the service for less. Can I tell them about the current contract so they could ask to bid on providing the service?

A18: No. However, the information you have may be important to OHSU. Contact Logistics to advise them of the information you have so they may explore the situation further. (See [Chapter 5](#) in OHSU's policy manual).

Q19: If I see a co-worker intentionally damaging or misusing OHSU property, what should I do?

A19: Immediately report this to your supervisor, Public Safety, or another appropriate OHSU authority. If the situation remains unresolved, follow the reporting procedures described in Section L of the Code of Conduct.

Q20: I want to use my OHSU e-mail to send a birthday message to my sister in Ohio. Is this permitted?

A20: Yes, as long as the message is brief and you send it during a break or before or after normal working hours so it will not interfere with your work. (See OHSU policy [11-20-010](#)).

Q21: I have a second job with a local marketing firm. Can I use my OHSU e-mail and telephone to follow up on business related to that job?

A21: No. You cannot use OHSU resources for personal commercial use. (See OHSU policy [11-20-010](#)).

Q22: I like to listen to music while I work. Can I download music files from an Internet site and save them on my OHSU computer?

A22: No. Downloading music files and saving them on an OHSU computer severely hinders OHSU network operations because of the size of the files and the possibility of introducing viruses to the system. This practice also is a violation of United States copyright law.

Q23: A friend sent a movie to me using my OHSU e-mail address. Can I share this with others at OHSU?

A23: No. It is illegal to reproduce, transmit, or receive copyrighted material without express written permission of the owner. Therefore, receiving this movie is potentially a criminal activity and also would violate the OHSU "Acceptable Use Policy." (See OHSU policy [11-20-010](#)).

Q24: A friend sent a poignant, timely story to me at my OHSU e-mail address. Can I share it with others by sending it to OHSU's public e-mail groups?

A24: No. Communications via the e-mail system shall be professional and for the workplace. OHSU policies

specifically prohibit distributing chain letters because they significantly interfere with OHSU's computing resources and infringe on employees' rights to an OHSU e-mail system that is free of "spam" and other unwanted messages.

OHSU's Code of Conduct – Guiding Principles

Professional

- Members of the OHSU community are honest and exemplify personal integrity and ethical behavior.
- OHSU endorses the highest professional standards related to the clinical, research, academic, administrative, and other professions comprising the OHSU community.

Patient Care

- OHSU is committed to providing compassionate, appropriate care in a manner that is sensitive to our patients' individuality, personal beliefs, and culture.

Research

- The integrity of OHSU's researchers and OHSU's commitment to the ethical conduct of research are critical to our research mission.

Education

- OHSU provides outstanding educational opportunities for those who will be tomorrow's health care professionals, scientists, engineers, managers, and educators.
- OHSU places a high value on intellectual curiosity, academic freedom and integrity, and outstanding professional preparation.

Confidentiality and Privacy

- OHSU strictly adheres to federal and state laws and regulations in protecting the confidentiality and privacy of patient and research participant personal health information.

Diversity, Equal Opportunity and Respect in the Workplace

- OHSU encourages and respects diversity within the university and does not allow discrimination on the basis of race, color, gender, sexual orientation, religion, creed, national origin, physical or mental disability, marital status, age, or veteran's status in any activity or operation of the institution.

Personal and Environmental Health and Safety

- OHSU provides and promotes a healthy, safe environment for employees, students, volunteers, patients, and visitors.

Business and Legal

- OHSU bills in accordance with applicable laws, third-party payer requirements, and fair and ethical billing practices.

Conflict of Interest

- OHSU requires the disclosure and management of conflicting interests.

Government Relations and Political Activities

- As a public corporation OHSU follows guidance set forth by state law for the political activities of OHSU employees.

Fiscal Responsibility

- OHSU is a responsible steward for the funding and resources it receives for patient care, research, and education.

Other Applicable Policies and Expectations

- In addition to the Code of Conduct, OHSU issues statements of policy, procedures, and standards of conduct and develops general policies and procedures applicable throughout the institution.

Asking Questions and Reporting Concerns

- OHSU encourages and supports an environment in which its members may ask questions about integrity issues and report concerns in a safe, non-threatening atmosphere. If you have a concern, please follow this reporting procedure:
 - Respectfully talk to the individual(s) involved.
 - Discuss the concerns with your supervisor or an appropriate faculty member.
 - Discuss the concerns with a higher level authority in the unit/school.
 - Discuss the concerns with HR, Legal, Affirmative Action, or Integrity.
 - Call the OHSU Integrity Hotline @ 877-733-8313 (toll-free) or report a concern online at: <http://www.ohsu.edu/Integrity>