



Our
PASSION
is YOU

UMC Health System Code of Conduct & Compliance Program

A MESSAGE FROM OUR PRESIDENT

Our hospital, our health system, and our *Service is our Passion* culture has been built and established over many years. And just like a career, a family or a legacy, what we build is worth protecting. Our Code of Conduct is designed with a singular focus in mind...protecting UMC Health System, its employees and our mission to serve.



Our Code of Conduct rests upon and supports our standards of behavior that define UMC such as compassion, teamwork and safety. Truthfully, compliance is more than a program, it is a consistent effort to *be compliant*, with regulations, laws and good business practices all of which are designed to protect UMC Health System.

Our goals remain clear: to reduce patient and employee harm, to provide an excellent patient experience, and to maximize our financial health, and thus to earn trust – in UMC. I believe our Code of Conduct helps guide each of us toward accomplishment of these goals.

Thank you for reviewing our Code of Conduct. And thank you for *your contribution* to our success. Blessings to you and your family.

Mark Funderburk, MBA, RHIA, FACHE
President and Chief Executive Officer



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1. Program Overview

The UMC Health System Code of Conduct, adopted by the Board of Managers, is a core component of our comprehensive compliance program. The program reduces risk, prevents misconduct, and reinforces a culture grounded in ethics, accountability, patient safety, and operational excellence. It supports effective internal controls and ensures adherence to federal and state laws, as well as program requirements of governmental and private health plans.

The Code summarizes key policies and clarifies the conduct expected of all workforce members. It is intended to help employees make sound, ethical decisions in daily work and to protect patients, the organization, and the integrity of our mission.

2. Scope & Applicability

This Code applies to all members of the UMC Health System workforce, including UMC Hospital and UMC Physicians. Workforce members receive training on the Corporate Compliance Program and the Code of Conduct upon hire, annually, and whenever significant regulatory updates occur. Employees are required to read, understand, and sign an acknowledgment confirming their commitment to comply.

3. Our Mission, Vision, and Standards of Excellence

3.1 Mission

Service is our passion. We serve by providing safe, high-quality care to all, achieving financial performance, and training tomorrow's healthcare professionals.

3.2 Vision

To serve our patients in the best teaching hospital in the country.

3.3 Standards of Excellence

- **Attitude**
- **Communication**
- **Responsiveness**
- **Compassion**
- **Teamwork**
- **Ownership**
- **Safety**
- **Respect**



4. UMC Health System Partnerships

UMC Health System maintains a strong, enduring partnership with Texas Tech, which helps fulfill **our** mission and supports Texas Tech's academic pursuits in education and research. Together with Texas Tech Physicians, UMC Health System has strengthened reputation, expanded services, and grown responsibly through sound financial planning.

5. Our Pillars

- **Service** — Differentiate UMC Health System as the market leader in patient satisfaction.
- **Safety/Quality** — Continually improve as a High Reliability Organization (HRO).
- **Stewardship** — Maximize financial strength in service of our mission.
- **Teamwork** — Build and engage a talented team within our SIOP culture.
- **Growth** — Sustain and enhance the UMC Health System brand throughout the region.

6. General Compliance Standards & Behaviors

Every Employee will:

- Act ethically and professionally.
- Demonstrate honesty, integrity, and fairness.
- Treat patients and colleagues with empathy and respect.
- Complete required compliance education and ongoing training.
- Follow all applicable laws, regulations, policies, and procedures.
- Report suspected violations in good faith.

7. Patient Rights

- To personal dignity and respect.
- To have a family member or representative of choice or physician notified of his/her admission.
- To privacy.
- To know the identity of all caregivers.
- To receive all communication regarding the nature of their medical condition, treatment, and outcomes.
- To participate in their care.
- To be informed about advanced directives.
- To examine and receive an explanation of the bill regardless of payment.
- To have a secure and safe environment.
- To access their medical record.



- To have their pain assessed and managed in a timely manner and to be told about pain relief measures.
- To religious and other spiritual services.
- To expect respect for their cultural and personal values, beliefs, and preferences.
To have a family member or friend to be present for emotional support unless the presence infringes on other's rights, safety, or is medically or therapeutically contraindicated

8. Employee Rights

- A professional, safe work environment.
- Freedom from harassment and discrimination.
- Respect and dignity for all employees.
- Non-retaliation for reporting concerns in good faith.

9. Legal Responsibilities

9.1 Admissions, Transfers, and EMTALA

The Emergency Medical Treatment and Active Labor Act (**EMTALA**), commonly referred to as the “anti-dumping” law, is a federal statute that outlines how hospitals must provide care to individuals who come to the Emergency Center, including pregnant patients. Every person who presents to the Emergency Center will receive a medical screening exam (**MSE**) to determine whether an emergency medical condition exists. At University Medical Center, patients are evaluated based on their medical needs, not their ability to pay. Financial information is collected only after the patient has been assessed and stabilized, when appropriate. If a patient requires transfer to another healthcare facility, stabilization will occur prior to transport.

9.2 False Claims Act

The False Claims Act protects the government from fraudulent claims. Submitting claims to Medicare or Medicaid that you know or should know are false or fraudulent can result in significant civil and criminal penalties, including treble damages and fines, and possible imprisonment.

9.3 Anti-Kickback Statute (AKS)

AKS prohibits offering, paying, soliciting, or receiving remuneration (money, goods, or anything of value) to induce or reward referrals or generate federal healthcare program business. **Employees must not offer or accept payment or items of value in exchange for referrals, recommendations, or purchasing decisions.**



9.4 Physician Self-Referral Law (Stark)

Stark prohibits physicians from referring Medicare or Medicaid patients to entities with which the physician or an immediate family member has a financial relationship, unless an exception applies. Violations may result in denial of payment, refunds, civil penalties, and exclusion from federal programs.

9.5 Reporting Fraud, Waste, and Abuse (FWA)

Employees must report known or suspected violations. **Failure to report can result in disciplinary action** and may be considered participation in the violation.

9.6 Copyrighted Materials

UMC Health System prohibits the use of copyrighted, trademarked, or licensed material. Please contact the UMC Health System Marketing department before using any UMC Health System brands.

9.7 Contracts

All agreements must be in writing, reviewed by the Contracts Group and/or Legal, and signed by authorized individuals. Private understandings are not permitted.

9.8 Ineligible Individuals & Felony Crimes

UMC Health System will not engage with individuals or entities debarred or excluded by federal or state agencies. Employees, providers, and contractors are routinely screened against exclusion databases. On a monthly basis, all new employees, as well as existing employees, providers, and consultants, are reviewed to ensure there is no one individual excluded from any federal program. **UMC Health System uses Streamline Verify, the OIG exclusion data base, the Texas OIG exclusion data base, and the SAM data base to search for any excluded individuals.** Any individual who becomes ineligible must notify Corporate Compliance and Credentialing immediately. Felony charges or convictions must be disclosed to Corporate Compliance without delay.

10. Billing & Coding Practices

10.1 Accuracy of Documentation & Coding

Claims must accurately reflect services and supplies rendered. Bill only for services ordered and performed. Documentation must support medical necessity and coding selection. Suspected improper billing or documentation should be reported to a supervisor, Corporate Compliance, or the Hotline. Overpayments are promptly returned.

10.2 Record Retention

Records required by law must be created, maintained, and retained according to policy. Do not alter, falsify, remove, or destroy records prior to authorized dates. For retention questions, contact the Records



Management Officer at 806-761-0992. ***Never destroy medical records without having proper authority. UMCHS employees are responsible for preparing and maintaining accurate and reliable records.***

11. Confidentiality of Information

11.1 HIPAA Health Insurance Portability Accountability Act (HIPAA) of 1996

HIPAA establishes privacy and security requirements for protected health information (PHI). Board members, employees, volunteers, and contractors must comply with HIPAA and UMC policies that safeguard PHI across all media. Authorization must be obtained before releasing confidential information.

11.2 Usernames & Passwords

Usernames and passwords are confidential and must never be shared. Misuse may result in disciplinary action up to and including termination. Always lock your computer when away from your workstation. ***If you share your username or password with another and an audit is conducted, you will be held accountable for the information access. Always lock or log off your computer while away from your workstation. Pressing the 'windows' key and the letter 'L' at the same time will immediately lock your computer.***

12. Conflict of Interest (COI)

COI arises when personal interests may influence professional judgment. Disclose any potential conflicts for review and resolution. All employees receive COI education and complete annual COI questionnaires.

12.1 Gifts to Employees & Physicians

Employees may accept only nominal gifts (no more than \$25 per calendar year) and must never accept anything of value intended to influence decision-making. Physicians must not receive remuneration in exchange for referrals.

12.2 Entertainment

Social entertainment must not be used to influence business referrals or purchasing decisions. Do not accept personal gifts or complimentary trips from parties in competition with UMC Health System.

12.3 Relationships with Family Members, Contractors, or Vendors

Managers and supervisors must not directly hire or supervise family members. Maintain impartiality with vendors and contractors and disclose any association.



13. Employees

13.1 Harassment or Discrimination

UMC Health System prohibits harassment and discrimination in all forms. Report concerns immediately to Corporate Compliance and/or Human Resources.

13.2 Non-Retaliation

Reporting suspected wrongdoing in good faith is encouraged and protected. Retaliation is strictly prohibited. If you experience or suspect retaliation, report it to Corporate Compliance.

13.3 Employee Assistance Program (EAP)

The Employee Assistance Program (EAP) provides confidential counseling services through The Counseling Center at TTUHSC. Services are available to employees, spouses/partners, and minor children, and onsite counselors are available. EAP counseling is free and is for you and those in your household. To schedule an appointment, call **806.743.1327** or send an email to eap@ttuhsc.edu. ***EAP can help with the following issues: depression, stress, anxiety, alcohol or drug abuse, workplace issues, grief and loss, couple communication, managing family conflict, self-esteem and identity issues, healing from trauma, and much more.***

14. Electronic Media & Social Networking

Use of electronic and social media must never compromise patient privacy, safety, or organizational reputation. Email and internet systems must not be used for illicit, inappropriate, or offensive communications. Posting confidential information or images is prohibited and may result in termination. Only authorized personnel may speak on behalf of UMC Health System per Marketing policy.

15. License & Certification Renewals

Employees in licensed or certified roles are responsible for maintaining current credentials. Lapses may result in removal from duties, counseling, or termination. Some job roles require licensure, such as nursing; therefore, in this case, the nurse would not be allowed to work at the bedside or in any role that involves patient care.

16. Auditing & Monitoring

UMC Health System conducts auditing and monitoring to ensure appropriate patient care, accurate billing, complete documentation, and compliance with regulatory requirements. We strive to be paid for services provided—no more, no less.



17. Education & Training

Board members, employees, volunteers, and contractors receive compliance training at hire, annually, and when laws or regulations change. Orientation covers the Code of Conduct, Patient Rights, EMTALA, billing practices, handling of overpayments, COI, confidentiality and security of information, False Claims Act, Anti-Kickback Statute, Stark, HIPAA, PHI, restricted communications, electronic media, social media, and reporting processes. Annual competency testing is required; certain departments (e.g., Emergency Center) receive additional role-specific education.

18. Reporting Process

18.1 How to Report Suspected or Confirmed Violations

Report concerns to your supervisor, through the Hotline, via written report, or directly to Corporate Compliance. Confidentiality will be maintained to the extent possible.

- Hotline: (888) 329-6445
- EthicsPoint: www.ethicspoint.com or via the intranet red telephone icon
- Corporate Compliance (UMC Hospital): 806-761-0994 or 806-761-0992
- UMC Physicians: 806-761-0986 or 806-761-0992

You may report anonymously. Provide detailed information (e.g., patient medical record or financial numbers when applicable) to facilitate investigation. Intentional misuse of the reporting system or false statements may result in discipline.

19. Failure to Comply

Failure to comply with the Compliance Plan or applicable laws and regulations may result in disciplinary action, up to and including termination. Misconduct includes failure to report known or suspected non-compliance, participation in non-compliant conduct, and failure to be aware of compliance issues within your area. Legal violations may carry civil damages, criminal prosecution, and administrative exclusion.

20. Compliance Contacts

For questions or guidance, contact Amber Poe, Chief Compliance & Privacy Officer, at amber.poe@umchealthsystem.com or 806-761-0992.



Compliance & HIPAA Acknowledgment / Confidentiality Agreement

I acknowledge that I have read and understand the Code of Conduct and Ethical Behavior. I will comply with the standards in the Code and the Compliance Plan and cooperate with the Compliance Committee and Office. I will report unethical or illegal activities to my supervisor and/or the Compliance Office.

I acknowledge that I have read and understand information regarding the Health Insurance Portability and Accountability Act (HIPAA), including but not limited to:

- Hospital information may be confidential by law or UMC policy; I am responsible for protecting it.
- Confidential information includes patient, personnel, financial, administrative, and other information made confidential by law or policy, in any form or medium.
- I will access only the information I need to perform my job duties.
- I will follow security precautions: passwords, logout requirements, access codes.
- I will not disclose confidential information except as required to perform my duties or by law and only to the extent authorized.
- I will handle all confidential information to avoid inadvertent disclosure.
- I will not maintain personal files beyond what is necessary for job performance; such files are UMC property and subject to confidentiality restrictions. Email/internet use must comply with policy.
- Access to confidential information may be audited for potential breaches.
- Breaches may result in disciplinary action, including termination, and may lead to legal action.
- This acknowledgment is effective immediately and applies both retroactively and prospectively.
- I have completed annual compliance education and scored 80% or better.

Print Name:

Signature:

Department:

Date: