

FLORIDA INTERNATIONAL UNIVERSITY

ACADEMIC HEALTH CENTER

FIU-HCN

CODE OF CONDUCT

The Florida International University Academic Health Center ("AHC") is a component of Florida International University ("FIU" or "University"), a public institution, and is comprised of the Herbert Wertheim College of Medicine, the College of Nursing and Health Sciences, the Robert Stempel College of Public Health and Social Work, and the clinical departments and units of the College of Arts and Sciences (the "AHC Colleges") and such other departments and units of the University as may be designated as part of the AHC by the President or his designee. The AHC is committed to the highest standards of ethics and integrity in education, research and patient care. The Florida International University Academic Health Center Health Care Network Faculty Group Practice, Inc. ("FIU-HCN") provides administrative support services to the AHC clinical enterprise. The Faculty Group Practice is comprised of those clinical faculty members, other FIU employees, and independent contractors providing clinical or administrative services on behalf of or supporting the AHC clinical enterprise for which the FIU-HCN is providing billing and collection services. This Code of Conduct is a key part of the AHC / FIU-HCN Compliance Program. These principles reflect the AHC and FIU-HCN's core principles of ethical standards that guide all clinical faculty members, other FIU employees, and independent contractors providing clinical or administrative services on behalf of or supporting the Faculty Group Practice. The purpose of the Code of Conduct is to:

- Establish a set standards and principles to be followed by all employees providing clinical or administrative services on behalf of the Faculty Group Practice;
- Communicate to employees the ethical standards they are to follow; and
- Communicate methods of reporting incidents of concern in order to prevent, detect and correct activities that are not consistent with the Code of Conduct.

As an essential component of our compliance efforts, the AHC and the FIU-HCN expect all employees and independent contractors to act ethically and legally in discharging their responsibilities to the Faculty Group Practice. This Code of Conduct has been adopted to ensure that these expectations are understood and met.

The basic principles of conduct are as follows:

BE HONEST AND ETHICAL. Every employee is expected to adhere to high ethical standards when he or she acts on behalf of the Faculty Group Practice.

SPECIAL RESPONSIBILITIES OF LEADERSHIP In addition to following the Code of Conduct, the AHC, the FIU-HCN, and University leaders have a special responsibility to set an example by adhering to and promoting the highest ethical standards. As leaders, you will ensure that:

- Your conduct is consistent with the highest ethical and legal standards.
- The individuals reporting to you are aware of our ethical standards.
- The individuals reporting to you are aware of the laws, rules and regulations that apply to their jobs.
- The individuals reporting to you are aware of their obligation to report suspected violations of policies, laws rules and regulations.
- You create a work environment that is open and receptive to discussion and reports of possible ethical violations.
- You take the appropriate action when a potential violation is reported to you.
- You prohibit retaliation against anyone who reports a potential violation to you.

OBEY THE LAW. There are many laws, regulations and policies that govern the activities of the Faculty Group Practice, particularly those relating to billing. The AHC and FIU-HCN have developed policies to help explain these requirements. If you are not certain about what the law requires, you should ask for help. Guidance can be obtained from your supervisor, from the AHC Compliance Officer by calling the AHC Compliance Officer at (_____), or by going to the University reporting hotline, Ethicspoint at <http://www.ethicspoint.com/> or by calling 1-888-286-5154 (24 hours a day, 365 days a year).

BE TRUTHFUL. Particular care should be taken to ensure that all communications within the AHC and to outside agencies (including government representatives) are truthful, accurate and complete.

HONOR CONFIDENCES. Our patients rightfully expect that their private medical information be handled appropriately. Confidential information relating to the AHC should also be protected. Comply with the FIU and AHC / FIU-HCN policies governing confidentiality of patient and student information.

REPORT CONDUCT THAT CONCERNS YOU. If you believe that you have information about an activity that may be illegal or unethical, you should report such issues to a Departmental official, to the AHC Compliance Officer at 305.348.4737 or through the confidential FIU Ethics and Compliance Hotline at <http://www.ethicspoint.com/> or by calling 1-888-286-5154 (24 hours a day, 365 days a year). Such reports can be made anonymously.

Everyone, regardless of his or her employment position, must comply with the standards established by this Code of Conduct. Failure to comply is a serious matter that may lead to disciplinary action up to and including termination. In addition, employees who violate a law may be subject to legal prosecution.

Please review the Code thoroughly. If you have questions regarding the Code or encounter any situation that you believe may violate the Code, you should immediately consult your supervisor, your AHC Compliance Officer 305.348.4737. You also may call the FIU Ethics and Compliance Hotline at <http://www.ethicspoint.com/> or by calling 1-888-286-5154 (24 hours a day, 365 days a year). There will be no retribution for asking questions, raising concerns about compliance or for making a good-faith report of possible improper behavior.

Acknowledgement of Code of Conduct Policy

My signature on this form acknowledges that I have received Florida International University Academic Health Center and Florida International University Health Care Network Policy on Code of Conduct. I agree to read the Policy and carefully seek clarification when necessary.

I understand that the Code of Conduct Policy is mandatory and I will fully comply with the Code. Further, I understand that any violation of the Code by another employee or agent of FIU Academic Health Center and FIU-HCN must be promptly reported to my manager, administrator or the AHC Compliance Officer.

I confirm that I have not been excluded from participation in any health care program, nor to the best of my knowledge, have I been proposed for exclusion. I agree to notify the Compliance Officer or the Office of Legal Services immediately upon receiving written or verbal notification that I am proposed for exclusion from any governmental healthcare program.

Signature: _____ Date: _____

Printed name: _____ Panther ID#: _____

Position: _____ Department: _____