



UT Health
San Antonio

Multispecialty &
Research Hospital

CODE OF CONDUCT

Service, Integrity and Teamwork
are the guiding principles for
every action and decision we make.



DECEMBER 2024

Dear Colleagues,

Our shared mission is to Make Lives Better[®] for South Texas and the world. That mission is among the highest possible vocations. The only way we can reach this goal is to be guided by people-centered values. We each harbor these values in our hearts, and these values are made manifest by our shared guidelines for conduct. There is no mission that excuses poor personal conduct, especially when that conduct harms another.



Robert Hromas,
MD FACP
Acting President
UT Health
San Antonio

Therefore, agreed-upon Code of Conduct principles are not only the means to fulfilling our mission, they also embody the values that drive the mission.

When each of us buys a cup of coffee for a friend in distress, assists a lost visitor by escorting them to their destination, patiently listens to a colleague and then asks a follow-up question, or provides a helping hand to a coworker, we live out the values we all hold dear and that guide our Code of Conduct. Codifying Code of Conduct Principles is an opportunity to champion the values that drive our mission to Make Lives Better.[®]

I am proud to introduce the UT Health San Antonio Multispecialty and Research Hospital Code of Conduct because it reflects our core values and our commitment to integrity.



Jeff Flowers, MBA
Chief Executive Officer
UT Health San Antonio
Multispecialty &
Research Hospital

They are the physical manifestation of what is in our heart. Making Lives Better starts with making each other better. As we live out this Code of Conduct, we make each other better. We already do well at this; many surveys have ranked us as one of the best places to work in Texas.

This Code of Conduct is the guide for professional behavior across all facets of our institution. Upholding these Code of Conduct principles fosters our culture of service, integrity and teamwork in our daily interactions and decision-making processes. They are the framework that helps us navigate complex situations with a steadfast commitment to honesty, transparency and accountability. By adhering to these principles, we strengthen not only our individual responsibilities but also increase our capacity to provide exceptional education, research and patient care.

At UT Health San Antonio, we recognize that values-based conduct is the cornerstone of our institution's reputation and success. Together, we can continue to uphold the high standards that define our institution and inspire trust within the communities we serve. Thank you for your dedication to excellence and integrity.

Highest regards,



Robert Hromas, MD FACP
Acting President
UT Health San Antonio



Jeff Flowers, MBA
Chief Executive Officer
UT Health San Antonio
Multispecialty & Research Hospital



BUILDING A CULTURE OF SERVICE, INTEGRITY AND TEAMWORK BEGINS WITH YOU.

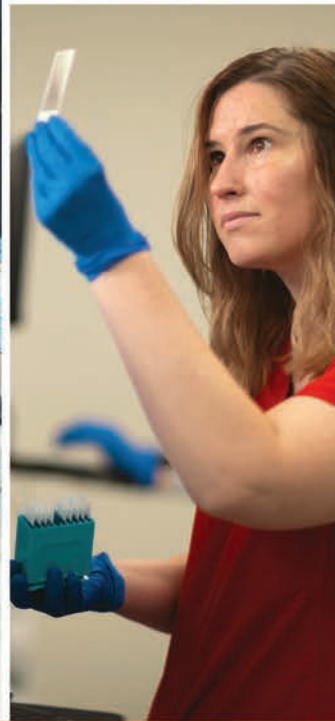
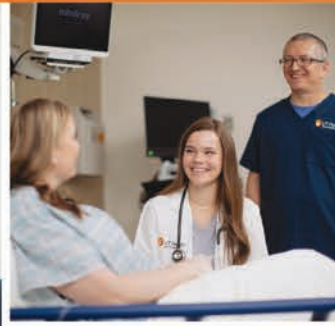
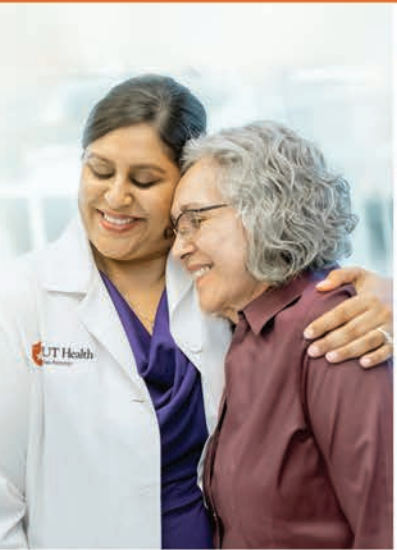


TABLE OF CONTENTS

Purpose	6
Mission, Vision and Values	7
Service with Integrity	8
Integrity in Patient Care	9
Code of Conduct Principles	10
I. Individual Responsibility and Accountability	10
II. Professional Behavior	10
III. Compliance with Laws, Regulations, and Standards	11
IV. Patient Rights and Quality of Care	11
V. Safe and Healthy Workplace	12
VI. Respect for Others	13
VII. Privacy and Confidentiality	13
VIII. Billing and Coding Integrity	14
IX. Avoiding Conflicts of Interest	14
X. Responsible Use of Resources	15
XI. Avoid Gifts	15
XII. Research Integrity	16
XIII. Ethical Responsibility and Voicing Concerns	17
Compliance Support	18



PURPOSE

At UT Health San Antonio Multispecialty and Research Hospital (MSRH), we are committed to upholding the highest standards of ethics and compliance in everything we do. We strive for honesty, transparency and accountability in both the delivery of health care services and the management of our business operations. Our Code of Conduct is a vital component of this commitment, aligning with the hospital's mission, vision and values, and supporting our Institutional Compliance and Privacy Program.

This Code serves as a guide for all hospital workforce members, including members of the medical staff, ensuring that daily activities are carried out in accordance with ethical and legal standards. It emphasizes our core values of Service, Integrity and Teamwork, helping to protect and promote these principles as we work toward achieving our mission and compliance objectives. While the Code provides essential guidance, it is not intended to cover every situation or address medical ethics.

For further details related to the Code of Conduct, please refer to the MSRH Policy Library or contact the Institutional Compliance and Privacy Office.

WHO MUST ABIDE BY THE CODE OF CONDUCT?

The Code of Conduct applies to all operations of the UT Health San Antonio Multispecialty and Research Hospital, including its Hospital Outpatient Departments (HOPD) and any other entity controlled or managed by UT Health San Antonio Multispecialty and Research Hospital (collectively referred to, herein, as MSRH). It applies to all individuals and entities involved in providing services to or on behalf of the MSRH, including but not limited to faculty, staff, members of the medical staff, trainees, volunteers, vendors, board members and others conducting business with or for the hospital.

As the Code of Conduct reflects our core values of Service, Integrity and Teamwork, it is essential that everyone associated with the MSRH adheres to these principles. Disciplinary actions or other appropriate measures will be taken against anyone who fails to comply with the principles outlined in the Code.

MISSION, VISION AND VALUES

Tomorrow's Medicine Begins Today at UT Health San Antonio Multispecialty and Research Hospital

Fueled by our commitment to excellence and discovery, this patient-centered hospital will deliver a singular healing advantage for the people of South Texas, ushering in a game-changing, fundamental shift to proactive, personalized medicine.



MISSION

To deliver hope and healing by uniting the power of discovery with the humility to serve.

VISION

Transforming health care through healing discovery.

VALUES

Our core values are Service, Integrity and Teamwork. We encourage our team to create meaningful moments with every interaction.

RELATIONSHIP-BASED CULTURE

We are committed to creating a healing culture by focusing on key relationships with:

- » Patients and Family
- » Colleagues
- » Self
- » Community

PILLARS OF PERFORMANCE

We will operationalize our mission by:

- » Inspiring Hope
- » Driving Innovation
- » Delivering Excellence



SERVICE WITH INTEGRITY

At UT Health San Antonio MSRH, we are fully committed to adhering to all relevant laws, regulations and ethical standards. To ensure we meet these commitments, it is essential that we all conduct ourselves in accordance with the principles outlined in our Code of Conduct.

The Code of Conduct serves as a clear guide to the expectations and standards of behavior for all who are part of the MSRH team. It sets forth key principles that govern how we conduct our business and deliver patient care with integrity. For more detailed guidance, please refer to the **Institutional Handbook of Operating Policies** and the **MSRH Policy Library**, both available on the UT Health San Antonio Policy Administration Office website at <https://wp.uthscsa.edu/pao/policy-libraries/>.

MSRH expects all individuals—whether providing patient care, conducting business or engaging in any other activities on behalf of the hospital—to fully comply with the principles, policies and procedures outlined in this Code of Conduct.

SERVICE THAT MEETS OUR STANDARDS

We Are All Required To:

- » Read and understand the Code of Conduct within 30 days of employment and on an annual basis
- » Use the Code in your daily decision making
- » Follow MSRH policies and procedures
- » Lead by example and promote integrity in your work areas
- » Contact the Institutional Compliance and Privacy Office with questions or to report potential violations. **Compliance Hotline 877-507-7317**

INTEGRITY IN PATIENT CARE



PATIENT SAFETY AND QUALITY OF CARE

Ensuring patient safety and quality of care is MSRH's highest priority. Our first responsibility is to the patients we serve and their families.

MSRH employees have a responsibility at every level of the organization to maintain integrity and quality in our job performance. We work in a complex environment where errors can sometimes happen. To help our organization learn from safety events, and near-miss issues, all persons working at MSRH are expected to report patient safety issues and errors in a timely manner using the online patient safety reporting system and normally within 24 hours of the incident.

PATIENT RIGHTS

The MSRH continuously strives towards a culture of Service, Integrity and Teamwork. We are focused on prioritizing patient safety and delivering world-class care to all our patients. Caregivers are expected to honor the rights of patients and to treat patients with dignity and respect while promoting a safe care environment.

We will not discriminate against any patients based on age, race, ethnicity, religion, culture, language, physical or mental disability, socioeconomic status, sex, sexual orientation, or gender identity.

Patient confidentiality must also be respected at all times. Patient information, including photos, must not be posted to a website, social media page or public forum without appropriate authorization from the patient. Caregivers must always protect patient information by knowing and following the requirements of the MSRH's privacy and security policies and procedures.

RESEARCH

The MSRH is committed to following ethical standards in full compliance with federal and state laws and regulations in any research, investigations, and clinical trials conducted. MSRH is committed to integrity in disseminating appropriate, valid scientific results in accordance with applicable regulations and guidelines. It is the MSRH's priority to protect the rights of its subjects. As in all financial accounting and record keeping, MSRH's policy is to submit accurate and complete costs related to research grants.

“WE ARE ESTABLISHING A NEW FRONTIER IN HEALTH CARE EXCELLENCE FOR COMPLEX SURGERIES, ADVANCED CANCER TREATMENT AND GROUNDBREAKING CLINICAL RESEARCH THAT WILL TRANSFORM THE PATIENT EXPERIENCE FOR THE PEOPLE OF SAN ANTONIO AND THE ENTIRE REGION OF SOUTH TEXAS.”

- UT SYSTEM CHANCELLOR JAMES B. MILLIKEN



CODE OF CONDUCT PRINCIPLES

I. INDIVIDUAL RESPONSIBILITY AND ACCOUNTABILITY

All members of the MSRH workforce—employees, faculty, members of the medical staff, students, vendors, contractors, volunteers and governing bodies—are expected to act with responsibility and accountability in accordance with their roles and delegated authority. Each individual is accountable to their colleagues, the hospital, and the public for their actions, as well as for their decisions not to act.

Every person is expected to exercise sound judgment, prioritize the best interests of MSRH, and uphold the highest standards of integrity in all business and clinical activities. This collective responsibility ensures that we work together to achieve our mission and maintain the trust placed in us by those we serve.

II. PROFESSIONAL BEHAVIOR

All members of the MSRH workforce are expected to conduct themselves with professionalism, courtesy, and respect, fostering a positive environment that supports our values of Service, Integrity and Teamwork.

Unacceptable behavior, including demeaning, disruptive or threatening actions, or any behavior that hinders the ability of others to perform their duties, will not be tolerated. It is essential that everyone contributes to a respectful and collaborative workplace. Any instance of such behavior should be promptly reported to management for appropriate action.



III. COMPLIANCE WITH LAWS, REGULATIONS AND STANDARDS

All activity by or on behalf of the MSRH is to comply with all applicable federal, state and local laws and regulations. Failure to comply can have serious adverse consequences both for the individual and for the hospital, affecting reputation, finances or the health and safety of patients and the community.

MSRH policies and various federal and state laws prohibit fraudulent claims activity. The federal False Claims Act and state fraud and abuse prevention laws prohibit conduct such as knowingly submitting a false or fraudulent claim or using or making a false statement to get a false or fraudulent claim paid. Performing routine audits or reviews and monitoring, along with internal controls, helps MSRH prevent and detect fraud, waste and abuse.

MSRH expects workforce members to report known or suspected activity of this type to the Institutional Compliance and Privacy Office. Individuals who lawfully report false claims or other fraudulent conduct or who otherwise assist in an investigation or action are protected from retaliation to the furthest extent possible under both federal and state laws.

IV. PATIENT RIGHTS AND QUALITY OF CARE

The MSRH recognizes and supports the rights of all patients to high-quality care without discrimination due to age, race, ethnicity, religion, culture, language, physical or mental disability, socioeconomic status, payor source, sex, sexual orientation, or gender identity. The MSRH will always treat patients and their families with consideration and respect, and recognize their dignity and right to privacy.



V. SAFE AND HEALTHY WORKPLACE

The MSRH endeavors to create a safe and healthy environment for employees, patients and visitors. The MSRH requires and ensures that all aspects of its employment practices are in full compliance with applicable laws and regulations, including those concerning hours, compensation, opportunity and working conditions.

MSRH will not employ or conduct business with individuals or entities that have been denied, debarred or excluded through relevant sanctions or regulations, or who are otherwise ineligible for participation in federal or state healthcare programs. As a condition of employment, MSRH workforce members are required to notify Human Resources immediately if they are currently, or to the best of their knowledge, will be in the future, listed by the federal Department of Health and Human Services Office of Inspector General, the General Services Administration or the applicable state Medicaid Exclusion and Suspension List as a person who is excluded from participation in federal or state health care programs.

Safety practices have been put in place to reduce the likelihood of accidents and to minimize exposure to hazardous or infectious materials. The hospital monitors hazardous situations and keeps records of all workplace injuries and illnesses. Employees must immediately report unsafe or unhealthy working conditions to their supervisors or the appropriate office.

For the health and well-being of our employees and patients, the hospital has adopted a tobacco-and drug-free campus policy. Additionally, all workforce members are urged to take an active interest in their environment and to immediately notify the UT Health San Antonio Police Department of any suspicious persons or activities.

VI. RESPECT FOR OTHERS

We recognize the important role our workforce plays in ensuring our ability to deliver on our mission. We are committed to creating a workplace where all individuals are treated with dignity, respect and fairness.

The MSRH promotes an atmosphere of courtesy and respect. We will provide a work environment for all free from harassment and discrimination, in accordance with MSRH policies.

Prohibited harassment includes, but is not limited to, unwelcome behavior where the purpose or effect of the behavior:

- » Creates an intimidating, hostile, abusive, or offensive work environment
- » Unreasonably interferes with an individual's work performance
- » Otherwise adversely affects an individual's employment opportunities

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

Individuals who believe they have been the victims of prohibited discrimination or harassment or who believe they have witnessed such conduct that may violate MSRH's policies against such conduct should promptly report the behavior to their supervisor, Human Resources, and/or the Compliance Hotline.

VII. PRIVACY AND CONFIDENTIALITY

All workforce members are responsible for safeguarding patient privacy and confidentiality in accordance with federal privacy laws (HIPAA) as well as MSRH policies and procedures. Many employees have access to sensitive, confidential or proprietary information. Confidential information, including patient records, should only be accessed, used, or disclosed when explicitly authorized and necessary to fulfill assigned job duties.

If you suspect any breach of violation of patient privacy or confidentiality, it is critical that you report it immediately to the Institutional Compliance and Privacy Office. Prompt reporting allows the hospital to investigate and address any potential issues quickly, ensuring compliance with privacy laws and protecting patient trust.

Reports can be made directly to the Institutional Compliance and Privacy Office, via the Compliance Hotline, or through the appropriate reporting channels. Retaliation against individuals who report in good faith is strictly prohibited.

CODE OF CONDUCT CHECK:

BY TREATING EACH INDIVIDUAL WITH DIGNITY AND UNDERSTANDING, WE STRENGTHEN OUR ABILITY TO WORK TOGETHER AND FULFILL OUR MISSION OF COMPASSIONATE CARE AND DISCOVERY.

VIII. BILLING AND CODING INTEGRITY

At MSRH, documentation of medical records, business records, and billing practices must align with our core values of Service, Integrity and Teamwork. Accurate, complete and timely documentation and billing are essential to demonstrating our commitment to providing high-quality patient care while maintaining the trust of our patients and colleagues.

To ensure consistency with these values, MSRH has developed policies and procedures for documentation and billing practices that comply with all applicable federal and state laws, as well as requirements for private payors. These policies require that all medical and business records be accurate, complete and free from false information. Additionally, patient billing claims must fully and accurately reflect the health care services provided, as documented in the medical record.

The Civil False Claims Act prohibits knowingly submitting false or fraudulent claims for payment or approval. Improper documentation or billing practices may be deemed fraudulent and could result in corrective actions. This includes actions against individuals who, despite having knowledge of improper practices, fail to report such behavior.

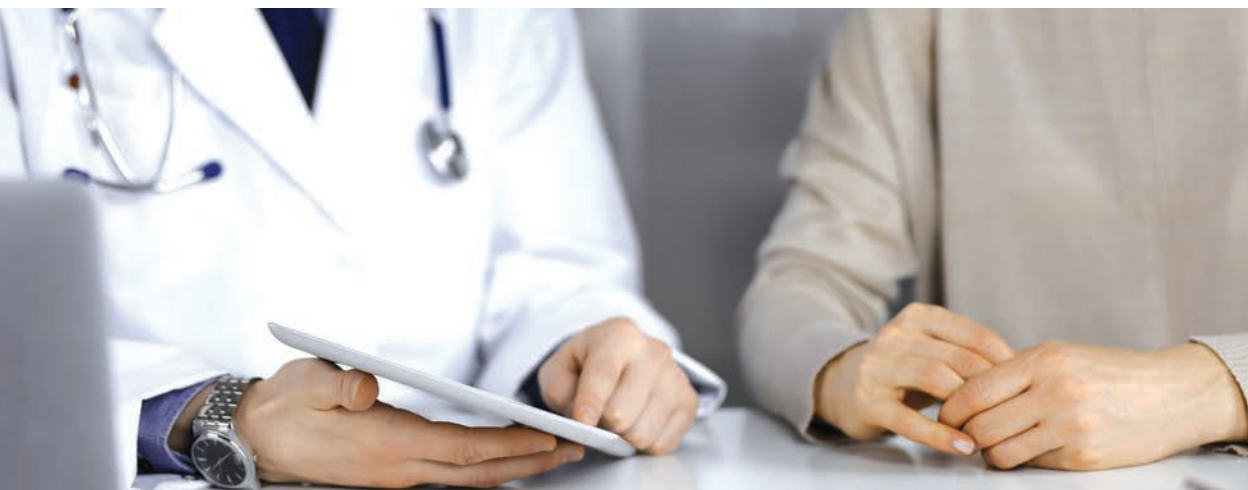
If you believe any documentation or billing practice is inconsistent with MSRH's policies and procedures, please address the concern with your immediate supervisor. If you do not feel comfortable discussing the issue with your supervisor, you may escalate the matter to upper management or the Institutional Compliance and Privacy Office.

For more detailed information on MSRH's documentation and billing practices, please refer to the MSRH Policy Library.

IX. AVOIDING CONFLICTS OF INTEREST

A conflict of interest arises when an individual's personal, professional or financial interest interfere with their ability to make objective and unbiased decisions in the best interests of the hospital. Conflicts of interest can occur in various areas, such as business relationships, purchasing decisions, the use and management of MSRH resources or research activities.

Even the appearance of a conflict of interest can erode trust, damaging the reputation of both the individual and the hospital. Therefore, workforce members must disclose any actual or potential conflicts of interest to the Institutional Conflict of Interest Office on an annual basis, via the electronic reporting system. These disclosures will be reviewed and evaluated to identify appropriate steps to manage, mitigate or eliminate the conflict.



X. RESPONSIBLE USE OF RESOURCES

Every member of the MSRH workforce plays a crucial role in advancing our mission to transform health care through healing discovery. This vision is supported by the substantial resources entrusted to us. As a state institute of higher education, MSRH's resources are considered public resources and are governed by specific laws, rules and guidelines that ensure their proper use.

We are committed to using these resources in ways that align with our mission, support our strategic vision, and serve the public good. To uphold this responsibility, the MSRH workforce members must refrain from using hospital resources-including time, funds, equipment or any other assets for the following purposes:

- » Wastefulness,
- » Personal benefit or gain,
- » Causing harm to others,
- » Engaging in political activities, or
- » Participating in illegal activities such as bribery or kickbacks.

By adhering to these principles, we ensure that MSRH's resources are used effectively and ethically, helping us continue our work of improving patient care and advancing scientific discovery.

XI. AVOIDING GIFTS

MSRH is committed to avoiding situations that might create an actual or potential conflict of interest. Faculty and staff should not personally accept any material gifts, gratuities, or other payments, in cash or in kind, from physicians, patients, patients' family members and vendors currently doing or seeking to do business with MSRH. It is never appropriate to give or receive gifts or favors (such as meals or entertainment) that might be interpreted as an inducement.

For more information contact the Institutional Compliance and Privacy Office for assistance.

CODE OF CONDUCT CHECK:

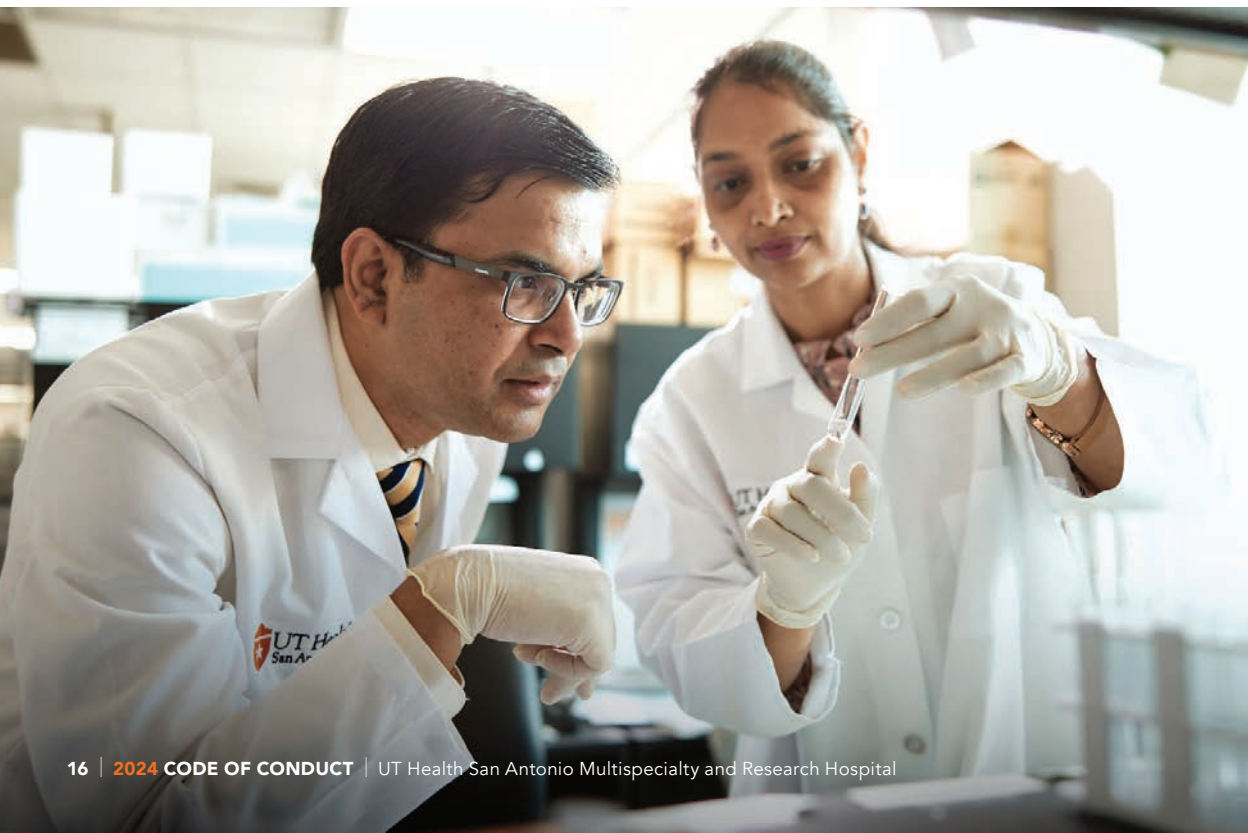
IT IS ALWAYS BEST TO SEEK ASSISTANCE FROM THE INSTITUTIONAL COMPLIANCE OFFICE IF YOU HAVE QUESTIONS ABOUT THE APPROPRIATENESS OF A GIFT OR FAVOR.

XII. RESEARCH INTEGRITY

Research is key to achieving our mission to deliver hope and healing by uniting the power of discovery with the humility to serve, and is driven by our values of Service, Integrity and Teamwork.

In pursuit of our mission, we are committed to ensuring that all research is conducted according to the highest ethical standards and in compliance with all applicable laws, rules, guidelines, and hospital policies. It is imperative that workforce members engaged in research:

- » Understand the principles and laws that govern research
- » Maintain a working knowledge of MSRH's research-related policies and procedures
- » Conduct research in compliance with applicable laws, MSRH policies and procedures and other governing documents



XIII. ETHICAL RESPONSIBILITY AND VOICING CONCERNS

Abiding by the MSRH Code of Conduct is a condition of employment for every hospital workforce member. All hospital workforce members are required to participate in mandatory training activities as part of their role at MSRH.

Each individual affiliated with MSRH has a responsibility to report any suspected or actual violation of the Code of Conduct, or any irregularities in hospital policies, to their supervisor, Human Resources, or the Institutional Compliance and Privacy Office. Reports can also be made anonymously via the Compliance Hotline at 877-507-7317. While the Compliance Hotline is available for anonymous reporting, it is intended to supplement, not replace, other communication channels within the organization. It should be used when other methods have been ineffective.

To ensure patient safety and the highest quality of care, all safety events, near-misses, and/or errors should be reported using the High Reliability Platform (HRP) patient safety event reporting system, available at <https://secure1.nextplanesolutions.com/> or through the HRP icon on your desktop.

The MSRH maintains a strict non-retaliation policy to protect individuals who report concerns in good faith. "Good faith" means that you honestly believe the information you are reporting is true. Reports made in good faith will not result in retaliation or adverse consequences for the individual making the report.

For Further Information Contact:

Institutional Compliance and Privacy Office:

210-567-2014
compliance@uthscsa.edu

Patient Safety and Quality of Care Office:

210-562-8633

High Reliability Platform (HRP) patient safety reporting system at:

secure1.nextplanesolutions.com

Office of Human Resources:

AskHR: 210-567-8847
Main Number: 210-567-2600
askHR@uthscsa.edu

Compliance Support

UT Health San Antonio 's Institutional Compliance and Privacy Office has instituted rigorous standards for compliance and ethics. The Compliance Program promotes open identification, discussion, reporting and resolution of compliance issues without fear of retaliation. For more information about the Institutional Compliance and Privacy Office, visit the Compliance website at <https://wp.uthscsa.edu/compliance/>.

Contact Us

UT Health San Antonio Institutional Compliance and Privacy Office

University Plaza
7526 Louis Pasteur Dr., 3rd Floor, 3.118
San Antonio, TX 78229
210-567-2014
wp.uthscsa.edu/compliance



Chief Compliance and Privacy Officer

Jessica L. Saldivar, JD, LL.M, CHC, CHRC

210-567-2066
Saldivarj1@uthscsa.edu

COMPLIANCE HOTLINE

You may choose to remain anonymous.

877-507-7317

wp.uthscsa.edu/compliance/compliance-hotline/



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