



Code of Conduct

Revised 2024

Contents

1		
	Introduction	5
<hr/>		
	A message from Danny Jacobs	6
	The OHSU community	7
	Accountability	8
2		
	Expectations and guidance for everyone	9
<hr/>		
	Culture of integrity	10
	Diversity, equity, inclusion and belonging	11
	Creating a sense of belonging at OHSU	12
	Deepening our learning	13
3		
	Our responsibilities to each other and the people we care for	14
<hr/>		
	Expectations for all OHSU members	15
	Discrimination	16
	Harassment	16
	Bullying	17
	Retaliation	18
	Title IX of the Education Amendments of 1972 and Campus SaVE Act	18
	Sexual harassment	18
	Guide for responding to OHSU member concerns	19
	Our responsibilities for addressing and preventing discriminatory misconduct and harassing behavior	20
	Patient care	21
	Health and safety	23

4		
	Our responsibilities to report and be accountable for our actions	26
<hr/>		
	Problem solving	27
	Reporting concerns	28
	Resources	29
	Discipline and remediation (corrective measures) guidelines for employees	30
5		
	Our academic and research responsibilities	32
<hr/>		
	Our responsibilities for teaching and learning	33
	Academic and research standards	33
	Intellectual property	35
	Export controls	35
6		
	Protecting OHSU information and assets	36
<hr/>		
	Keeping OHSU information secure and private	37
	Creating and maintaining records	40
7		
	Interacting with our community	41
<hr/>		
	Communication with the public	42
	Political involvement and related activities	44

8		
	Working with our external business partners	45
<hr/>		
	Vendor relationships and management	46
	Determining conflicts of interest	48
	Recognizing and managing gifts and entertainment	49
9		
	Our responsibilities to the law:	50
	Working with federal, state and local authorities	
<hr/>		
	Communicating and cooperating with regulators and investigations	51
	Anti-corruption and bribery	52
	Fraud, waste and abuse prevention and the False Claims Act	53
	Insider trading	54
10		
	Code of conduct and you	55
11		
	Glossary	57



Accessibility Note

This document has been formatted to meet accessibility standards. For best performance in a digital format, we recommend downloading the document as a PDF and using the Adobe read aloud feature.

If you would like to request this document in an alternate format, please contact the Employee Leaves and Accommodations office at ela@ohsu.edu or 503-494-8060, the Office for Student Access at studentaccess@ohsu.edu or 503-494-0082, or OHSU Integrity Office at integrity@ohsu.edu or 503-494-8849.

1 Introduction



Dear OHSU Community,

At Oregon Health & Science University, we pride ourselves on improving the health and well-being of people in Oregon and beyond.

As an organization, we follow many laws, regulations and professional standards. But most importantly, we not only want to model best practices in education, research and patient care, but also to lead in identifying opportunities for improvement.

In that light, OHSU is committed to continuously reviewing our policies and practices to ensure they are as inclusive, effective and equitable as possible.

This edition of the Code of Conduct (“Code”) affirms the values that matter most to our community, from employees, learners and students to vendors, volunteers and visitors. The Code outlines the principles, expectations, rights and responsibilities to help everyone be as successful as possible in their working, learning and healing environments.

To fulfill our mission, we must embrace a culture that includes everyone, and honors people’s individual lived experiences and identities. Misconduct, including discrimination, harassment, violence, sexual misconduct, retaliation, bullying and intimidation cannot be tolerated at OHSU.

Please join me in carefully reviewing this Code, following its standards and bringing the highest level of integrity to all that you do for OHSU.

Sincerely yours,

A handwritten signature in black ink that reads "Danny Jacobs". The signature is written in a cursive, flowing style.

Danny Jacobs, M.D., M.P.H., FACS

OHSU President

The OHSU community

This Code of Conduct¹ provides the guidelines and expectations for all those working, learning, and conducting business at OHSU.

It has been approved by the OHSU Board of Directors and adopted as policy. All OHSU members are held to its standards. As with other OHSU policies, adherence to these standards ensures effective, efficient operations that enable us to achieve our mission.

A vision for the future

Our vision is to make Oregon a national leader in health and science innovation for the purpose of improving the health and well-being of Oregonians and beyond.

OHSU's focus on healing, teaching and discovery — combined with our deep history in Oregon — is unique. We are the state's only academic health center and one of the only universities in the U.S. devoted exclusively to educating doctors, dentists, nurses, pharmacists and public health professionals.

We not only treat the most complex health needs in the region, we make discoveries that save lives and we train leaders to address the societal issues that impede health.

OHSU's mission

As part of its multifaceted public mission, OHSU strives for excellence in education, research and scholarship, clinical practice and community service. Through its dynamic interdisciplinary environment, OHSU stimulates the spirit of inquiry, initiative and cooperation among students, faculty and staff.

The Code of Conduct applies to all OHSU members, which includes:

- Members of the OHSU Board of Directors
- Employees
- Students and trainees
- Volunteers
- Visiting faculty, researchers and health care practitioners
- Contractors and vendors, while doing business with OHSU
- Others who work for or on behalf of OHSU

¹ While OHSU has attempted to be as clear as possible in this Code of Conduct, questions may arise, and OHSU retains discretion over the application, interpretation, or the intent of the Code. Likewise, OHSU may change, amend, or modify this Code of Conduct from time to time and will notify members of any significant changes that affect them.

Accountability

The Code details the fundamental principles and framework for action within our organization. It states our expectations and responsibilities, which support our culture of acting with integrity. We value safety and transparency and support OHSU members who act in the prevention, detection and resolution of ethical and integrity issues.

Promptly report concerns about possible violations of laws, regulations, OHSU policies and this Code, without fear of retaliation, especially from those in positions of power and influence. Under no circumstances will retaliatory behavior be tolerated. This is something OHSU takes very seriously and will hold people accountable for their actions.

Making the right decision is not always easy. There will be times when you will be under pressure or unsure of what to do. Always remember when you have a tough choice to make that you are not alone. Your colleagues, classmates, and the resources cited throughout this Code are available to help.

For more information on reporting and retaliation, refer to section 4, Our responsibilities to report and be accountable for our actions.



OHSU has many policies that provide guidance for almost every aspect of OHSU's operations and services.

The Code of Conduct provides an accessible overview of some key policies and definitions that everyone working or learning at OHSU should know and understand. Please refer to individual policies referenced in the Code for more information.

As a reminder, policy information can be found on the [OHSU Policies](#) page on O2 and OHSU members should always follow specific policy language and guidance that supports your role at

2

Expectations and guidance for everyone

Culture of integrity

What is integrity? Integrity means we do what we say we will do and keep our promises. OHSU is committed to integrity in everything we do. We call this having a “culture of integrity.”



A culture of integrity at OHSU includes reviewing how we do things and finding ways to do them better.

Expectations

All OHSU members are expected to meet and uphold the following responsibilities:¹



Be familiar with and follow the Code of Conduct and OHSU policies.

- Avoid rude, violent, or inappropriate behavior.
- Never use your authority or job position to take advantage of someone else or to harm others.
- Honor people's privacy, space, belongings, and right to be treated fairly.
- Follow the Code of Conduct when you work with OHSU's partners, such as other clinics or hospitals.
- Be aware of how your personal relationships can affect your role at OHSU.



Meet the standards of your profession or academic program.

- Understand and abide by OHSU policies and maintain knowledge of state, federal, and local laws or regulations that may impact your role.
- Meet the ethical and professional standards of your role.
- Keep your licenses, certifications and other qualifications required for your role up to date.
- Complete your required trainings on time.



Create and uphold a culture of integrity.

- Be honest in your words and actions.
- Speak up and report instances of potential OHSU policy violations. Support and encourage others to speak up if something doesn't seem right.
- Report problems if you notice them. If you want to try to solve a problem, focus on communicating honestly, talking openly and looking for ways to improve things.
- If you are part of a review, investigation, or audit, tell the whole truth by providing all of the information.



Promote high quality working, learning and healing environments.

- Treat all patients, families, visitors and OHSU members with respect.
- Be productive, work effectively and efficiently to the best of your skills and capabilities.
- Maintain a culture that values diversity, equity, inclusion and belonging in all university functions and services.
- Be open to feedback and take responsibility for your actions and behaviors.

¹ OHSU members include: Members of the OHSU Board of Directors; Employees; Students and trainees; Volunteers; Visiting faculty, researchers, and healthcare practitioners; Contractors and vendors, while doing business with OHSU; or Others who work for or act on behalf of OHSU.

Diversity, equity, inclusion and belonging

Diversity, equity, inclusion and belonging (DEIB) are priorities at OHSU. They are crucial to our core mission of healing, teaching and discovery. Our commitment to DEIB is an evergreen and is the responsibility every member of the OHSU community makes to our employees, our patients, our physicians and faculty, our students and learners, and our partners across the community that we care for. Embracing this responsibility is part of what makes OHSU a world-class institution that leads in patient care, research and discovery, and teaching.

In order to provide the best care for our patients and promote healthy work culture and learning environments for OHSU members, it is important that we all work toward understanding what is at the foundation of equality, thriving, and belonging for all people.

Creating a unified culture requires effort from every single individual at OHSU. We all have a part to play and it begins with self-reflection on how we have impacted those around us, learning more about each other, and taking clear actions to build a more inclusive and welcoming environment for each other.



Each group is a piece of the whole, and we cannot have a true culture of diversity, equity, inclusion and belonging if we ignore or minimize the importance of any group.

For the latest information on OHSU's diversity, equity, inclusion and belonging activities, please visit the [Diversity, Equity, Inclusion and Belonging](#) pages on O2.



Diversity is all the ways we differ from each other. Visible characteristics (e.g. race, ethnicity, gender) are often the focus of diversity. In addition to visible diversity characteristics, there are many other ways we can differ from each other (e.g. sexual orientation, gender expression and identity, age, religion, disability status, citizenship, socioeconomic status) that impact how we experience and interact with the world around us.



Inclusion is how we bring all of our differences together with respect.



Belonging is the feeling we have when we actively want to bring our full selves to OHSU because we sense that our uniqueness is valued and embraced by both our colleagues, classmates, our leaders, and our institution.



Equity is the process of enabling cultural transformation by eliminating existing barriers and proactively considering the needs of everyone in our OHSU community to ensure access and opportunities for all.

Creating a sense of belonging at OHSU

OHSU is one of the largest and most diverse institutions in Oregon. We value our diverse members from different races and ethnic groups, belief systems, abilities, and identities. We are committed to creating opportunities for everyone to do well and giving each person the help they need to be successful.

As part of our dedication to our diverse community and the diversity of the communities we serve, OHSU is on a journey to become an anti-racist organization. As part of this journey we must all review how we do things and find ways to do them better, including addressing racism and oppression on individual and institutional levels.

We are strongly against being hostile or insensitive through words or actions that make members of any group feel less valuable or important. We expect OHSU members to create and maintain working, learning and healing environments that do not intentionally, or unintentionally, exclude people. This commitment includes recognizing, avoiding and reporting discrimination, harassment, bullying and retaliation.

Some ways to show we respect and value one another are by:

- Learning about the experiences of people whose backgrounds are different from our own.
- Valuing and respecting different worldviews, viewpoints and behaviors.
- Being curious and listening with the goal of understanding.
- Using each person's name and words they use, including words that stand for someone's name (pronouns) such as she, he, they, or ze.
- Being careful about the words we use. Being familiar with the [OHSU Inclusive Language Guide](#) and following it.
- Using language and interpretation services if someone needs them.
- Making sure any materials given out or displayed include different people and members of different groups. Check that documents are culturally sensitive and can be read and understood by anyone.
- Recognizing that all OHSU members have unique advantages or barriers.



Institutional racism

Is defined as the policies, procedures, and practices that operate within institutions and organizations that disadvantage individuals and groups based on race.

Institutional racism has kept some people or groups from:

- Receiving a good education.
- Getting the health care they need.
- Benefiting from research.
- Succeeding in jobs or careers.
- Living safely and comfortably.



What it means to be an anti-racist institution

“An antiracist institution is an institution that creates policies, practices, and procedures to actively promote racial equity and justice” (Kendi, Ibram X. How to be an antiracist. One world, 2019)

At OHSU this means identifying and changing how institutional racism can impact:

- Services provided at and for OHSU.
- Working or learning at OHSU.
- The way OHSU conducts its business activities, including strategic partnerships and vendor selection.
- Education, research, health care and community activities.

Deepening our learning

Every OHSU member has a role to play in building a more diverse, equitable, and inclusive environment and promoting a culture of belonging. This requires us to learn more about ourselves and one another so that all can thrive and excel. Some ways we can do that are by:



Considering new ideas and different ways of thinking:

- Learn about your own biases and how they impact your work and decision-making by taking part in the [Unconscious Bias Initiative](#).
- Visit the [DEIB Education and Advancement](#) page to find trainings and education around diversity, equity, inclusion and belonging.
- Get involved with an [Employee Resource Group](#).
- Review and use the [OHSU Inclusive Language Guide](#) and [OHSU Anti Racism Guidebook](#).



Standing up for one another against hate and bias:

- Be an active bystander and report discrimination, harassment and retaliation that you observe or hear about to the [Integrity Helpline](#).
- Symbols of hate have no place at OHSU and will not be tolerated. Immediately contact [Public Safety](#) or file an [Integrity Helpline](#) report if hate symbols are found on or near OHSU facilities.



Seeking help when we need it:

- [Racial Trauma Resource page](#)
- [Racial Equity Support Line](#)
- [OHSU Avel Gordly Center for Healing](#)
- [OHSU Wellness - Spark](#)
- [OHSU Intercultural Psychiatric Clinic](#)
- [Labor Relations-Unions](#)
- [Employee Leaves and Accommodations](#)
- [Student Health and Wellness](#)
- [Student Accommodations](#)



Learning more every day:

- [Diversity, Equity, Inclusion and Belonging](#)
- [Cultural Awareness Guide for Religious and Spiritual Beliefs](#)
- [Library Resources on Race, Racism and Health Disparities](#)
- [Library Anti-Racism Resources](#)
- [Alliance for Visible Diversity in Science \(AVDS\)](#)

3

Our responsibilities to each other and the people we care for

Expectations for all OHSU members

OHSU is committed to learning and working free of discrimination, harassment, retaliation and bullying. Our commitment comes from our mission, vision and values, as well as a wide variety of federal, state, and local laws.

All OHSU members are expected to know, understand, and follow the [OHSU Discrimination, Harassment and Retaliation Policy \(DHR\)](#) and [Prohibition on Bullying Policy](#), which can be found on O2.

The DHR and Bullying Policies are intended to prevent and respond to misconduct, which includes bullying, discrimination, harassment, sexual harassment, sexual misconduct, sexual assault, domestic violence, dating violence, stalking, sexual exploitation, and retaliation.



This section provides an overview of OHSU Policies which apply to allegations of discrimination, harassment, bullying and retaliation.

The definitions in this section have been simplified from those detailed in the policies and are meant to be straightforward and provide context and examples.

When responding to reports of any concerns, the definitions and processes in the appropriate policy will be applied.



Important Policies

[Discrimination, Harassment and Retaliation Policy \(03-05-048\)](#)

This policy defines prohibited discrimination, harassment (including sexual harassment) and retaliation; outlines reporting options and obligations; and describes the investigation process for complaints or reports of Discriminatory Misconduct.

[Prohibition on Bullying Policy \(03-05-606\)](#)

This policy defines bullying and details responsible offices investigation process, including the appeal process and explains supportive and remedial measures as well as interim actions.

[Workplace Violence Policy \(07-30-020\)](#)

This policy outlines OHSU's commitment to a safe environment for our community, and OHSU's commitment to maintaining an environment free from violence and threats of violence.

Discrimination

Discrimination is when someone treats people in unfair or harmful ways because they belong to, or appear to belong to, a protected group or characteristic. Discrimination can be any behavior that affects employment, education or treatment or that creates a hostile environment.

Some examples of discrimination include, but are not limited to:

- Not getting a job because of your sex, gender, gender identity or gender expression.
- Being paid less than your peers because of your race.
- Not having an approved accommodation provided for a qualifying disability.
- Having your work hours reduced because of your religion.

Harassment

Harassment is a form of discrimination that targets a person or a group of people. Harassment can be verbal, visual, physical or any other type of behavior that intimidates, threatens or creates a hostile environment.

Some examples of harassment include, but are not limited to:

- Behavior that makes a person or group of people feel threatened, intimidated, offended or less than others.
- Calling names, telling jokes, or using negative nicknames or stereotypes for a person or a group.
- Using or sharing written, printed, or visual material with words or pictures that offend or make some people feel less valuable or important.



Protected characteristics include:

- Race
- Color
- Religion
- National origin
- Ethnicity
- Sex
- Sexual orientation
- Gender identity or expression
- Pregnancy
(including pregnancy-related conditions)
- Age
- Disability
(including physical or mental disability)
- Genetic information
(including family medical history)
- Ancestry
- Marital or familial status
- Citizenship
- Service in the uniformed services
(all as defined in federal or state law)
- Veteran status
- Expunged juvenile record
- Use of leave protected by state or federal law
- Use of the workers compensation system
- And/or any other status protected by law

Bullying

People work and learn best when they feel safe and respected. Bullying can be harmful words or actions that humiliate, degrade, demean, intimidate, and/or threaten a person or people. Bullying must not be part of the OHSU work or learning environment.

Some examples of bullying include, but are not limited to:

- Providing feedback to other OHSU members by yelling, screaming or other ways to embarrass, threaten or demean them.
- Hurtful or shameful comments about how someone looks, their family, lifestyle, or culture.
- Physical, verbal, and/or written actions toward someone, which causes them to reasonably fear for their safety and/or the safety of others.
- Staying in someone's personal space after being asked to move or step away and violating someone's personal space through unwanted touch.
- Openly and unfairly excluding colleagues from group activities.
- Sabotaging or threatening to sabotage someone's career advancement, studies or work.
- Spreading malicious rumors about others.

It is very important that OHSU members are able to provide feedback, have meaningful and ordinary managerial, mentoring and educational relationships.

Bullying is different from behavior which may be unpleasant or unsettling but is nevertheless appropriate for carrying out certain educational or employment-related responsibilities.

Bullying does not include:

- Providing appropriate critical feedback, including letting people know what the consequences may be for not addressing a concern.
- Classroom discussions of academic research or reasoned opinion on controversial topics.
- Critical feedback on the academic work of students, including advising a student of unsatisfactory academic work and the potential for course failure or dismissal from the program.
- Administrative actions such as performance reviews (including negative performance reviews), assigning work to employees, or other managerial decisions.



Protected activities include:

- Opposing a practice that is unlawful or that you reasonably believe is unlawful.
- Making a good faith report or assisting someone with a report of unlawful activity, discrimination, harassment, or retaliation or of an alleged violation of the Code of Conduct or OHSU's policies and procedures.
- Serving as a witness or participating in an investigation, proceeding or hearing related to unlawful activity, discrimination, harassment, or retaliation or of an alleged violation of the Code of Conduct or OHSU's policies and procedures.
- Participating in OHSU's reasonable accommodation processes.

Retaliation

Retaliation is a serious offense that can result in disciplinary action.

Retaliation is a negative action taken against an OHSU member because they reported a concern, took part in a protected activity or were part of an investigation.

Some examples of retaliation include, but are not limited to:

- Being reprimanded for reporting unlawful actions in your department.
- Being demoted for seeking an accommodation for a disability or religious observance.
- Being disciplined by your supervisor for being a witness in an investigation into discrimination in your department.
- Being punished for reporting sexual harassment.

Title IX of the Education Amendments of 1972 and Campus SaVE Act

OHSU follows Title IX (Title 9) of the Education Amendments of 1972 and the Campus Sexual Violence Elimination Act (Campus SaVE Act). We prohibit discriminating against people because of their sex or gender. This applies to sex and gender discrimination in education programs, activities, employment and admissions.

Sexual harassment

Sexual harassment is unwelcome sexual advances, requests for sexual favors and other verbal or physical harassment related to sex.

Sexual harassment does not have to involve strictly sexual behavior. For example, repeated and offensive comments about women or any gender can be sexual harassment. People who harass others can be of any gender. They can be supervisors, colleagues, peers or even patients.

Teasing and offhand comments are not usually covered under sexual harassment rules, but they can have lasting emotional effects and be considered unprofessional behavior.

Some examples of sexual harassment include, but are not limited to:

- Repeated jokes or comments about sexual acts or sexual orientation.
- Requests for sexual favors, whether stated or implied.
- Making work or learning opportunities dependent on sexual favors.
- Unwelcome sexual advances.
- Unwanted physical contact or touching.
- Unwanted or sexually explicit texts, photos or emails.
- Talking about sexual acts, fantasies or stories.



OHSU does not tolerate retaliation, which is an attempt to punish or “get back at” someone who reports a concern.



OHSU's Title IX Coordinator is specially trained to address concerns around Title IX compliance. To contact OHSU's Title IX Coordinator, Angela Fleischer, email titleix@ohsu.edu or call 503-494-5148 and press 6.











Learn more about prohibited sexual harassment in [OHSU's Discrimination, Harassment and Retaliation Policy \(03-05-048\)](#).



Although someone's personal experience of the conduct is important, by itself it may not be enough to be considered harassment under OHSU policy, but may be a violation of other policy. OHSU will consider the personal experiences of those involved in all aspects of response.

Guide for responding to OHSU member concerns

-  Create space for receiving concerns by being open to understanding the issue.
-  Listen to understand what occurred and why the individual is concerned, whether they are concerned about you or someone else.
-  Explain what you are required to report from what they tell you. Offer them reporting and support resources, including confidential reporting options.
-  If their concerns relate to discrimination, harassment, or retaliation, make sure they know about the [Discrimination, Harassment and Retaliation Policy \(03-05-048\)](#) and are provided a copy of the current policy by email. It is important to know your obligations under section 5 of the DHR Policy.
-  Follow up on the concern in a timely manner and take appropriate action. This could include providing information, support or a referral to another resource for further review, assistance or investigation.
-  Cooperate in any internal investigation. When it is appropriate, help decide on the appropriate action to correct the situation and help carry that action out.
-  Keep the individuals information private. Only discuss the incident with those who need to know, such as HR, Legal, OCIC, Student Affairs or Risk Management.
-  Make sure there are no further acts of misconduct or incidents of retaliation against anyone who has reported or participated in an investigation, raised a concern, requested an accommodation, or engaged in other protected activities.



If the individual is sharing concerns about discrimination or harassment, stop them before they mention a specific concern. Ask if they want to keep the concerns confidential. If they say yes, stop the conversation. Explain that you cannot keep it confidential, but OHSU has other people who can. Direct them to confidential support and reporting resources such as the [Ombuds](#), [Confidential Advocacy Program for students](#) or the [Confidential Advocacy Program for employees \(CAP-E\)](#), or a [Confidential Intake Specialist](#) with the [Office of Civil Rights Investigations and Compliance \(OCIC\)](#).



These expectations apply to all OHSU member Code of Conduct concerns brought to a leaders attention. If a member shares concerns with you, you are expected to take it seriously, listen respectfully and address or escalate it appropriately.

Our responsibilities for addressing and preventing discriminatory misconduct and harassing behavior

Be an active bystander and speak up for the OHSU community

- Be responsible for noticing and reporting discrimination, harassment, intimidation or bullying concerns.
- Speak up if you see someone offending another person or saying something offensive.
- If you are not comfortable telling someone they offended you, you have the option to make a formal complaint through the Integrity Helpline.

Mandatory reporting

All OHSU Employees who are not Confidential Employees, are required to promptly report discriminatory or harassing behavior when they become aware of, or reasonably suspect an incident of discriminatory or harassing behavior involves an OHSU member. When making a mandatory report provide the following to the OHSU OCIC/Title IX Office through the [Integrity Helpline](#) or the [Internal Incident Report Form](#):

- Name
- Date
- Time
- Location
- Description of the incident
- Involved parties (to the extent known)
- Include notes of any conversations the OHSU member had with the individuals

If you have questions about your reporting obligations, please contact OCIC at ocic@ohsu.edu or 503-494-5148.

For information regarding the OHSU [Internal Incident Report Form](#) please refer to the [Integrity Helpline O2 page](#).



The Office of Civil Rights Investigations and Compliance (OCIC) investigates reports of discrimination, harassment and retaliation based on protected characteristics and activities.

Reports of discrimination, harassment and retaliation not based on protected characteristics or activities may be responded to by Human Resources (for employees) or Office of Student Affairs (for students) or other appropriate OHSU departments.



If an investigation finds that an OHSU member has engaged in conduct against the OHSU [Discrimination, Harassment and Retaliation Policy \(03-05-048\)](#), or this section of the Code of Conduct, immediate and appropriate corrective action will be taken. Employees who have engaged in misconduct may face discipline up to and including termination. Students who have engaged in misconduct may face sanctions up to and including suspension or dismissal per the [Student Suspension, Dismissal and Appeal policy \(02-30-050\)](#). An investigation will allow the accused individual a full opportunity to share their experience, provide witnesses and evidence and address any evidence raised against them.

Patient care

We are committed to providing compassionate, appropriate, high-quality and cost-effective health care. We are also committed to respecting the unique qualities, personal beliefs and culture of each person and their family. We provide health care in a way that considers and respects each person's culture and the way they think and feel about illness and treatment.

OHSU follows the [Patient's Bill of Rights](#) detailed by the federal government. We comply with the [Emergency Medical Treatment and Labor Act \(EMTALA\)](#) by conducting a thorough medical screening and providing stabilizing treatment to all individuals seeking emergency care or in labor, irrespective of their financial status or insurance coverage. Patients with emergency medical conditions are transferred only upon their request or when our facility lacks the capacity or resources to address their needs, ensuring that appropriate care is accessible at another facility. These transfers adhere strictly to both state and federal EMTALA regulations.



The U.S. Department of Health and Human Services has issued guidance on [Section 1557 of the Patient Protection and Affordable Care Act](#) that makes it unlawful for any health care provider that receives funding from the Federal government to discriminate, exclude people or treat them differently.

OHSU does not discriminate (exclude people or treat them differently) or harass people based on their protected characteristics, which include:

- Race
- Color
- Religion
- National origin
- Ethnicity
- Sex
- Sexual orientation
- Gender identity or expression
- Pregnancy
(including pregnancy-related conditions)
- Age
- Disability
(including physical or mental disability)
- Genetic information
(including family medical history)
- Ancestry
- Marital or familial status
- Citizenship
- Service in the uniformed services
(all as defined in federal or state law)
- Veteran status
- Expunged juvenile record
- And/or any other status protected by law

Our responsibilities for patient care

- Treat people receiving care, and their families, with respect and dignity.
- Listen and respond to people's health care needs and the needs that their families and communities tell us. Make reasonable efforts to do things the way they prefer and honor their rights, culture, belief systems and preferred language.
- Help people receiving care and their families to communicate with us. OHSU offers free language interpretation and translation services, which are outlined in the following policies: [Interpreter Services Policy \(HC-LAN-107-INT-POL\)](#) and [Translation of Documents for Individuals with Limited English Proficiency Policy \(HC-PRM-137-POL\)](#).
- Maintain a safe patient care environment that is free from verbal, sexual, physical, emotional or mental abuse and other behaviors and situations that might prevent the best care.
- Step in to help in any situation where a patient, family member or visitor does something that is not allowed at OHSU. You can ask someone with more authority, like a supervisor or Public Safety, to help if you cannot help directly or do not want to.
- Help patients and families keep their belongings safe. Turn in any items found to Public Safety.
- Never ask for, hint about or accept offers of gifts, tips or loans from patients or their family members. If patients and family members insist on giving something, refer them to the OHSU Foundation so they may gift OHSU in a beneficial way.
- Do not provide medical, nursing or other treatment to yourself or members of your immediate family except in emergencies.



Important Patient Policies

- [Patient Rights and Responsibilities](#)
- [Patient Visitation Policy \(HC-PRM-109-POL\)](#)
- [Patient/Visitor Safety Assessment and Planning Policy \(HC-PRM-135-POL\)](#)
- [Requests for or Refusal of Healthcare Professionals or Other Personnel with Specific Characteristics Policy \(HC-PRM-133-POL\)](#)
- [Administrative Discharge of an Adult Inpatient Policy \(HC-CGM-105-POL\)](#)
- [Dismissing Patients from Clinic and/or MyChart due to Disruptive Behavior Policy \(HC-AMB-109-POL\)](#)
- [EMTALA \(Emergency Medical Treatment and Active Labor Act\) Obligations Policy \(HC-EDM-106-POL\)](#)
- [Patient Complaint-Grievance Management Process Policy \(HC-PRM-107-POL\)](#)

Health and safety

Nothing is more important to us than making sure OHSU members, patients and everyone else at OHSU are safe. We must always be careful to use safe, appropriate and proven procedures and look out for the safety of others. We must look for health and safety risks and report any hazards we see.

A culture of safety

Decreasing patient harm by reducing preventable medical events is a primary health care provider obligation. To reduce preventable patient harm, the Institute of Medicine and other regulatory agencies have urged health care organizations to create a “culture of safety” in which safety is the core value and highly reliable systems of care are the core strategy.

Creating a culture of safety requires that we constantly learn how and why preventable harm occurs and that we dedicate ourselves to continuously improving the systems in place to prevent harm. This includes active listening and providing guidance and support to team members and asking for help when needed. We are committed to achieving a “culture of safety” at OHSU by addressing all aspects of that culture, including creating an environment in which it is easy and desirable for anyone to report safety events.



For more information, please refer to the [Environmental Health and Safety](#) resources on O2.

Contact ehs@ohsu.edu for assistance with investigating work-related safety hazards posing risk of injury/illness to staff.



Our responsibilities for health and safety

- Take the needed steps to conduct your job or learning activities safely and protect other OHSU members, patients, visitors and the public.
- Learn about the safety standards and best ways of performing your duties and being in your work or learning environment.
- Make sure OHSU buildings, laboratory spaces, chemicals, drugs, equipment and products are used safely. Also make sure the policies and laws for their use are followed.
- Follow [OHSU's Workplace Violence Policy \(07-30-020\)](#), and do not threaten, intimidate anyone or engage in any form of violence.
- Do not have any firearms or other weapons on OHSU property. Refer to the [Weapons and Firearms Policy \(07-30-010\)](#).
- Expect contractors and third parties to follow OHSU safety requirements.
- Follow the [Tobacco-Free Environment Policy \(07-90-021\)](#).

We embrace four components of a culture of safety at OHSU:



Just culture: We recognize that most mistakes come from system failures. We are committed to a non-punitive and transparent response to error reporting. We maintain individual accountability for actions in a manner that reflects overall patterns of behavior and performance.



Reporting culture: We continuously dedicate ourselves to promoting open reporting of errors. We commit to a response that is objective, timely and reliable and ensure that all members know where and how to report. There is no penalty for good faith reporting of a concern.



Learning culture: We develop highly reliable systems and teams by engaging in process improvement efforts, using internal and external sources to guide our learning and being transparent with OHSU members, patients and families. We are committed to creating diverse teams to enable learning that reflects the many needs and points of view from the communities we serve.



Engaged and informed culture: We are mindful and respectful of the ideas and perspectives of all OHSU members. We honor the courage of those who raise concerns and foster the development of trusting relationships that enhance our community. We provide the space and time needed for all OHSU members to voice input.



Patient Safety Reporting

Report all patient or visitor safety concerns or other unsafe conditions to [Patient Safety Intelligence \(PSI\)](#). If there are concerns of violence by a patient, visitor or OHSU member, contact [Public Safety](#) immediately.

PSI provides an important mechanism for learning about unexpected events, obstacles encountered in the delivery of patient care and potentially unsafe conditions present in the environment or system. Reports are routed to the appropriate manager based on the type and location of the event and they will investigate, take appropriate action, and follow up with the reporter.

The patient safety team reads all reports to evaluate patient harm and preventability and manages the investigations for high harm events. In addition, the patient safety team analyzes the aggregate PSI data to assess risks and works with leaders across the organization to identify systems changes that may help to reduce those risks.

If you need to file a PSI report you can submit a report directly to the [PSI system](#) or through the [Safety and Support](#) section of O2 and in Epic through the references section.

Our expectations to create a safe environment:

- Hold ourselves individually accountable.
- Respond to events, errors and near misses in a thankful, transparent, consistent and timely manner.
- Raise concerns with team members in a respectful manner.
- Develop and cultivate highly reliable systems and teams.
- Actively seek out perspectives that are underrepresented in the process of designing, developing, and enhancing systems.
- Fulfill our obligation to safety and system learning by reporting safety risks.
- Learn from our mistakes and correct problems and inconsistencies as soon as possible.
- Be honest and transparent with OHSU members, patients and families about safety.
- Promptly report all patient safety incidents or concerns to [Patient Safety Intelligence \(PSI\) reporting system](#).

**Worker and Student Injury Reporting System (WSIRS)**

WSIRS is an online reporting tool designed to streamline the communication between an injured party, their supervisor or proctor and Risk Management for near miss incidents, injuries, exposures and conditions sustained during OHSU directed activities. Good faith use of WSIRS is a protected activity.

To make a WSIRS report visit wsirs.ohsu.edu.



If you have a concern about a decision, behavior or action that may be a possible safety risk (e.g. workarounds, breakdowns in team communication, non-standard practices), you are responsible for speaking up immediately. If you have a concern, notify your manager or report an issue to the [Integrity Helpline](#), [PSI](#) or [WSIRS](#) as appropriate.

4

Our responsibilities to report and be accountable for our actions

Problem solving

The diverse people and points of view at OHSU create great results when we work and learn together.

However, disagreement is normal in any work place or learning environment. Through respectful and clear communication, we are able to work and learn together through many challenges and disagreement.

What can OHSU members do to resolve conflicts?

Talk with your colleague

Work directly with your colleagues to solve the problem.

Talk with a supervisor, a person in a leadership position or Student Affairs.

- Talk with a supervisor or person in authority if you cannot solve the problem with your colleague.
- The person you talk with may be a lead worker, supervisor, manager, department head, division director, program director or someone else in a leadership position.
- You can go to the supervisor or a person in a leadership position with your colleague or on your own.



Need help with a different workplace or learning environment problem? Please go to the [Problem Solving for OHSU Members](#) page on O2.



Talk with other resources that can help.

- You may also contact the Integrity Department, OCIC, or Human Resources directly for assistance.
- Talk to someone who is not involved in the situation (a third party). This may be a mentor, coach, mediator or facilitator.
- Other resources at OHSU include:
 - [Confidential Advocacy Program for employees \(CAP-E\)](#)
 - [Career and Workplace Enhancement Center-Manage Conflict](#)
 - [Spark Wellness](#)
 - [OHSU Ombuds Office](#)
 - [Confidential Advocacy Program for students](#)
 - [Student Support](#)

Reporting concerns

OHSU fosters a culture of reporting a question or concern. When you speak up to clarify a policy or report questionable conduct, you are protecting your colleagues, the interests of patients, caregivers, students and learners and the reputation of OHSU.

Remember, an issue cannot be addressed unless it is reported. You can take action, such as giving information, directing the people involved on what to do, or having another party review the situation. You may be required to report concerns that you hear or notice.

No penalty for reporting a concern

There is no penalty for good faith reporting of a concern. This is true no matter what type of concern you report or how you report it. OHSU believes reporting concerns honestly and in good faith (with the intent to improve OHSU rather than harm the other person) is positive. We take it seriously when someone says another person tried to retaliate or punish them for reporting a concern. If you believe someone tried to retaliate, punish or get back at you, you should report the concern immediately.



Designated Reporter

All employees, except for Confidential Employees or individuals working in their professional capacity, are required to report instances of discrimination, harassment, retaliation, or sexual misconduct that they observe, are told about, or suspect. All designated reporters should report all concerns, including information such as names, dates, times, locations, and a description of the incident and involved parties to the [Integrity Helpline](#) or through the [Internal Incident Report Form](#).



The Integrity Helpline

The Integrity Helpline is OHSU's confidential and anonymous reporting system. It is the place for all OHSU members, patients, and visitors to raise concerns about misconduct or suspected violations of the Code of Conduct, our policies or the law.

Integrity Helpline reports remain confidential to the extent possible under OHSU policies. Information will only be shared on a need-to-know basis for investigatory purposes or as required by law.

The Integrity Helpline is available 24/7 and can be reached either by visiting ohsu.edu/helpline or calling 1-877-733-8313.

For more information and guidelines for reporting, visit the [Integrity Helpline](#) page on O2.



OHSU does not tolerate retaliation, which is an attempt to punish or “get back at” someone who reports a concern in good faith.

Resources



OHSU Integrity Helpline

OHSU has a free, confidential and anonymous way to ask questions and report concerns, the Integrity Helpline. You may report concerns online or call a toll-free phone number 24 hours a day, seven days a week.

1-877-733-8313
ohsu.edu/helpline

If you use the helpline to report a concern, you will receive a unique tracking reference code. You can use this code to provide additional information or answer questions for the case as needed. The code will make sure any new information links to your original report and allows you to stay anonymous if desired.



Confidential community resources

Crisis Text Line: Text HOME to 741741 in the U.S.

National Suicide Prevention Lifeline: 800-273-8255

National Sexual Assault Hotline: 800-656-HOPE*

National Domestic Violence 24-hour hotline:
 800-799-7233 (for domestic violence survivors)*

*Can connect callers to local resources and providers.

Learn more at [OHSU Civil Rights Policies and Resources](#).



Confidential resources at OHSU:

Confidential Advocacy Program for Employees (CAP-E):
 call 503-494-5148 or email CAP-E@ohsu.edu.

Confidential Advocacy Program for Students (CAP): 1-833-495-2277 or 503-494-3256, cap-support@ohsu.edu

OHSU Ombuds Office (for everyone): 503-494-5397, ombuds@ohsu.edu

Employee Assistance Program (EAP) (for employees):
 Call 1-800-433-2320 or Text 503-890-1777

Employee Mental Health Services (MHS): call 503-494-5271, email occhealth@ohsu.edu, or [self-schedule on Enterprise Health](#).

Student Health and Wellness: 503-494-8665 or ohsu.edu/student-health

School of Medicine Resident and Faculty Wellness Program: Page clinician on duty at **10975** 7 days a week 9am-6pm, if after hours call the Spark Employee Assistance Program at 1-800-433-2320, or set up an initial meeting via email at wellnessmeeting@ohsu.edu. Access the [O2 page](#) for more information.

OCIC Confidential Intake Specialist: call 503-494-5148 or email ocic@ohsu.edu

Learn more at ohsu.edu/confidential-support.



Respect for All Guide and App

Reporting options and resources for anyone who experiences, witnesses or hears of prohibited bias, discrimination, harassment, sexual assault, sexual misconduct or retaliation are available in the [Respect for All Guide](#) and App.

Discipline and remediation (corrective measures) guidelines for employees

Management rights, responsibilities, and expectations

OHSU managers set goals and objectives for our most valuable asset, our employees, as well as manage employees' performance to ensure desirable organizational results are achieved. Managers also have important responsibilities and expectations related to facilitating employee success and maintaining an optimal and productive work environment.

Managerial responsibilities and rights include the following:

- Coaching, goal setting, training, and re-training direct reports.
- Hiring, promoting, transferring, evaluating, and disciplining employees.
- Deciding which positions are in the workforce, how work is organized, and how work is assigned.
- Establishing job-related standards, expectations, and guidelines, in compliance with regulatory requirements.
- Responding promptly and appropriately to employee concerns and complaints.
- Equitably interpret and apply policies and procedures, without discrimination based on protected characteristics or on the basis of non-work-related factors.

Managers should provide employees with:

- A clear understanding of the job description and performance and productivity standards.
- Knowledge of applicable employment-related policies and procedures, such as those relating to attendance, leave, and civil rights.
- A safe and healthy work environment that encourages the reporting of concerns raised in good faith.
- Materials, system access, resources, department or job specific policies and procedures, and equipment needed to do the job.
- Direction on how to approach complex work, work problems and other matters that can impact individual and team productivity.
- Informal, timely, and behaviorally specific feedback, with reasonable expectations, in a friendly and respectful manner.
- An opportunity to correct behaviors and performance concerns through corrective action, dependent upon the seriousness of the conduct.



Tips for managers

- Help the individual feel safe sharing their concerns and listen to understand the concerns shared.
- Share information about support resources with employees, students and learners. For example, make sure they know about the following programs at OHSU: [Confidential Advocacy Program for students](#), [Spark Wellness](#), [Confidential Advocacy Program for employees \(CAP-E\)](#) and [OHSU Ombuds Office](#).
- Refer to individual OHSU schools and programs [handbooks](#), [policies and resources](#) available to students and [Graduate Medical Education](#) resources for learners across the university.
- Set a good example by admitting your own mistakes and correcting them.

Discipline and remediation guide

The [Discipline and Remediation guide](#) is a tool to help managers evaluate and respond to employee performance concerns and workplace issues in a fair and equitable manner and to enhance transparency and the consistent applications of our expectations for employees. The guidelines are also intended to create transparency for employees across OHSU into the discipline and remediation processes related to expected attendance, conduct, and performance.

It is a priority for OHSU leadership that all disciplinary and remedial actions are thoroughly considered with an equity lens and incorporate OHSU's progressive discipline philosophy. For questions or more information about the Discipline and Remediation guide, contact the [Advice and Counsel Center \(ACC\)](#).



Code of conduct and policy violations

When a manager considers corrective action for an employee, they should first consider:

- What was the nature and severity of the incident or infraction and potential ramifications.
- What was the root cause of the issue and the employee's responsibility of such cause.
- Did system-based or organizational-level factors contribute to the outcome.
- Would informal resolution, like coaching or training, be effective.
- How often the violation has occurred in recent months or years.
- The employee's overall record of performance and length of service.
- How similar past situations have been handled or are currently handled in other areas.
- Were there any mitigating or escalating circumstances that impacted the situation.

Employees may have options for filing a grievance in response to a disciplinary action, although such options vary based upon role and representation.

5

Our academic and research responsibilities

Our responsibilities for teaching and learning

Educators are responsible for:

- Treating students and learners respectfully and communicating clearly with them.
- Creating learning environments that encourage respectful sharing of ideas and perspectives and support inquiry and reflection.
- Supporting our students and learners in becoming honest, compassionate, respectful, and ethical professionals.
- Supporting students and learners in working toward program and graduation outcomes.
- Abiding by legal and ethical guidelines in disclosing or accessing student or learner information.
- Ensuring accommodations are respectfully met.

Students and learners are responsible for:

- Honoring the learning environment through active participation.
- Respecting our instructors, mentors, administrators, fellow colleagues and other OHSU members.
- Learning and practicing the ethical standards of honesty, compassion and care you will use in your profession.

Academic and research standards

OHSU recognizes the power and importance of discovery for OHSU members, patients, and the larger community. To continue to perform the highest quality of research and to maintain research excellence, it is critical that we uphold our commitment to research integrity and maintain the highest standards for all research.

For our clinical research, we are committed to helping patients who take part in OHSU research stay informed and as healthy as possible while also supporting their families. We create and maintain an environment that provides privacy, security and comfort.

Academic integrity is an essential and professional virtue. Faculty, students and learners are expected to act with integrity when teaching, learning and conducting research. They are also expected to act with integrity toward each other, their patients, OHSU members and the professional community. Academic integrity includes creating original academic work, citing proper sources, including that of technologies if warranted, not plagiarizing, or taking credit for another person's ideas or work.

Our teaching and learning philosophy

- OHSU aspires to be the destination for transformational learning allowing all who enter our doors to be the next generation of outstanding health care providers, health advocates, and scientists.
- As educators, students and learners, we value curiosity and the academic freedom to pursue knowledge wherever it may lead, without undue or unreasonable interference.
- We value keeping our promises, being honest in all our actions, and working earnestly to ensure every professional is prepared to do their job well.
- We believe educators, students and learners must be equally valued and respected. We are responsible for sharing information that is accurate and complete. We must continually work toward creating learning environments that foster inclusion and critical inquiry.



OHSU does not tolerate acts of academic or research misconduct, such as plagiarism, falsifying research information, other scholarly work or making research results seem different than what the data shows.

Learn more about [research misconduct](#).

Learn more about [academic policies](#):

- [Academic Policy](#)
- [OHSU Policy Manual, Chapter 2 - Student Affairs](#)



Our responsibilities for research standards

- Be sure that every participant who takes part in clinical research goes through a meaningful consent process. The consent form should be written in terms that facilitate understanding. There are additional rules for participants who do not speak English and for children. Work with the Institutional Review Board for guidance.
- Go through the appropriate review and approval process for research projects, and share clear information about any financial interest in the project.
- Use an approved research plan (protocol). Follow the appropriate [Research Services policies](#) and procedures for review and approval of all research projects. If the research plan changes, have the changes approved before using them in the research project.
- Make sure research results are reported accurately, including everything that happened in the project and the report or publication shares all of the outcomes from the study without bias.
- Follow all of the requirements and rules for all grants and contracts.
- Properly record all research costs. Charge all costs to the appropriate accounts.



Our responsibilities for academic standards

- As educators, we place a high value on intellectual curiosity, academic freedom, integrity and outstanding professional preparation.
- Individual schools and programs at OHSU maintain [student handbooks](#) that specify academic integrity policies.
- Understand and follow the [Conduct Relating to Students – Proscribed Conduct Policy \(02-30-010\)](#).

Intellectual property

As a health and research institution, OHSU encourages all OHSU members to create and develop new technology and ideas. We are also committed to sharing what our experts create with people in the research and education communities outside OHSU. The things our experts create at OHSU are called “intellectual property,” because while they are sometimes physical things, they may also be ideas, concepts or plans.

Sharing intellectual property helps us learn even more, succeed further at what we do, and help the people and communities we serve. However, it needs to be shared in the appropriate way. We must make sure it is known that the technology or product was developed at OHSU and that OHSU has rights as an owner. For more information please refer to the [OHSU Intellectual Property and Royalty Distribution policy \(04-50-001\)](#).

As part of working at OHSU, all OHSU members have assigned to OHSU all right, title and interest to anything they create as part of their job (intellectual property) if they used OHSU time or equipment to do it. This means anything you created during your normal OHSU working hours or using OHSU equipment. It also means anything created using OHSU supplies, space (facilities) or restricted information.

Export controls

Rules about sharing equipment, technology and data with citizens of other countries may restrict what you can send from OHSU. These rules may affect how you share data, even if you are in the United States. They may also affect who can have access to a lab or research database. Shipping or traveling internationally are also impacted by export control regulations.



Our responsibilities for intellectual property

- Work with [OHSU Technology Transfer](#) to put in place proper research agreements when collaborating with industry or scientists at other institutions to protect intellectual property.
- Disclose promptly to OHSU Technology Transfer any and all new technology and intellectual property that is developed through research (as detailed in the [Intellectual Property and Royalty Distribution Policy \(04-50-001\)](#)).
- Fill out all the forms OHSU requires for intellectual property. This includes giving rights, title and interest in it to OHSU.
- Do not assign, license or otherwise dispose of any intellectual property owned by OHSU. Only authorized officials of OHSU may do this.



Research and technical data you share with a citizen of another country is considered an export to that country whether you are at OHSU or at a conference, meeting or other event. When traveling outside the U.S., take reasonable care to keep anyone from having unauthorized access to your laptop, tablet or other devices.

If you have any questions, contact the [Office of Export Controls](#).

6

Protecting OHSU information and assets

Keeping OHSU information secure and private

Information is one of OHSU's most valuable assets. Everyone at OHSU is responsible for protecting it. We work with three categories of information: public, private or sensitive, and restricted.

3 categories of information

See Data Classifications Policy [ISP-02](#).



Public information

is information that is specifically intended for public audiences.

- General information on our educational programs
- Marketing materials that have been approved and published
- General information on health care services at OHSU
- Research publications
- Other information that is publicly available on our external website



Restricted information

must be kept secure and confidential. Only authorized people can use and share it. People who store, access and send it must follow [Information Privacy and Security \(IPS\)](#) policies. Most OHSU computing systems fall under the restricted information category.

- Protected health information
- Student information, including educational records
- [Education records](#) subject to the Family Educational Rights and Privacy Act, also called FERPA
- Employee personal information
- Learner personal information
- Any other OHSU information that the OHSU Data Steward says is restricted



Private or sensitive information

must be protected in a way that keeps it from being seen by people who should not see it. [Information Privacy and Security \(IPS\)](#) policies cover how private or sensitive information may be shared.

- Some types of research information
- Individual practice plans
- Communications and memos that are only for OHSU members, but do not contain restricted information



Our responsibilities for OHSU information and assets

- Follow all OHSU policies on confidentiality, information privacy and security. These include, but are not limited to, [Confidentiality of OHSU Health Information Policy \(01-05-012\)](#), [Acceptable Use of Computing and Telecommunications Resources Policy \(11-20-010\)](#), and all other privacy and security policies on [O2](#) or in [MCN](#).
- Keep all OHSU restricted, private and sensitive Information safe. For example, be sure to keep certain research results and patients' and families' confidential information safe and private.
- Only access, use or share OHSU information as required to complete your work or study-related duties. Ask your manager or program director if you have questions about your duties.
- When sharing OHSU restricted information:
 - Use a secure (encrypted) way to send the information, such as a password-protected network or virtual private network.
 - Use an ohsu.edu email account or other OHSU-approved transmission tool.
 - Never forward OHSU restricted information to a personal email address or unapproved cloud storage.
- Do not discuss OHSU restricted, private or sensitive information in public areas including, but not limited to, public transportation, the tram, cafeterias and restaurants, etc.
- Report any unauthorized use or disclosure of OHSU restricted information to the [Information Privacy and Security Office](#), the [Integrity Helpline](#), or to your supervisor.
- You must keep OHSU information confidential even after you stop working or learning at OHSU.



Our responsibilities for personal information

We have a legal and ethical responsibility to protect the private and confidential information of our employees, students, learners, volunteers, research subjects, patients and their families and other members of the OHSU community.

Only collect, use, and share personal information as required by your role. This includes student and learner information, protected health information, and research information. Refer to [Information Privacy and Security](#) and [Education Records](#) policies for details on how this information must be protected.



Our responsibilities for computer and telecommunication resources

- Make sure that any minor (incidental) personal use of computers, phones or other resources does not keep you or others from completing work or learning duties.
- Do not use OHSU equipment and resources for personal or non-OHSU commercial (money making) purposes.
- Keep all OHSU-issued computers, phones, and electronic devices and equipment physically secure.
- Understand that computer and network equipment provided by OHSU is OHSU's property. You cannot expect that your activities and use of this equipment will be private.
- Meet OHSU standards of respect and integrity.
- For more information see the [Acceptable Use of Computing and Telecommunications Resources Policy \(11-20-010\)](#).



Our responsibilities for protecting OHSU property

- Handle documents containing restricted and private or sensitive information carefully. Keep these documents properly secured, on and off OHSU property. This includes information stored on computer systems, removable storage media such as hard drives or disks, and physical papers.
- Make sure OHSU owned property is tagged or labeled appropriately. The tag or label should indicate whose property it is and where it belongs, such as to a research lab.
- Report signs of OHSU property being used incorrectly or stolen, or signs someone may plan to steal it. These may include:
 - OHSU property that is not kept in a secure place when not being used.
 - OHSU members allowing other people to borrow or use equipment without approval.
 - OHSU members sharing passwords or login information.
 - People in an OHSU area whom you do not know, and who do not have a badge or other proper identification.
 - Unusual use of areas with badge access, such as doors, elevators, and other areas designed to limit access to parts of OHSU. Unusual use includes, but is not limited to, an unknown person following you closely to get through a door, someone propping such doors open, and people sharing or switching OHSU badges.



Documents containing restricted or sensitive information shall be kept in their designated storage locations when not in use. Restricted and sensitive information are subject to security controls and can only be shared for valid purposes. Contact [Information Privacy and Security](#) if you need help determining whether certain information is restricted or sensitive.

Documents shall be destroyed in accordance with the [Records Retention and Destruction Policy \(07-90-010\)](#). They should never be destroyed in response to or in anticipation of an investigation, audit, claim, lawsuit or case hearing.

Creating and maintaining records

The public, government authorities and others need to be able to rely on OHSU having complete, accurate records. We are committed to sharing information openly. We make full, accurate, timely and understandable disclosure on all aspects of our operations as required by local, state, or federal law or regulation. All of us contribute to the process of recording employee, student, learner or patient information, research results or maintaining business documents. OHSU members whose work includes preparing public, financial, or regulatory information, which will be shared, have a special responsibility in this area. Accurate and accessible information is essential within OHSU so that we can make good decisions.

As a public corporation of the State of Oregon, OHSU is subject to public records requests under Oregon Public Records Law. All OHSU public records requests are facilitated by the OHSU Public Records Coordinator, in the Office of Strategic Communications. They work closely with the OHSU Legal department to ensure adherence to [OHSU policy](#) and Oregon Public Records Law, especially as it relates to identification of records that are exempt from disclosure or require redaction.

In response to a request for public records, OHSU must disclose all public records responsive to the request unless an exemption applies to the record. Information subject to disclosure includes, but is not limited to, any information created or received by OHSU, whether paper, electronic or otherwise generated. Should a public records request be received for an Integrity Helpline report, or any other OHSU record, the Public Records Coordinator and the OHSU Legal department will work together to meet our obligations under the law while withholding records or information properly exempt from disclosure, under Oregon Public Records Law, prior to disclosing responsive records to the requester. The Public Records Coordinator will provide an advisory notice to current OHSU members at the time of disclosure when their name appears in the responsive records, providing an opportunity to ask questions or request additional information regarding the public records request.

Records management

OHSU has policies for keeping and storing records. We follow proper procedures outlined in these policies to make sure our records are maintained, stored and destroyed when appropriate to meet our business needs and follow laws and regulations. Information can be found under [Records Retention and Archiving Questions](#) on O2.



Our responsibilities for creating and maintaining records

- Make sure the information we record is accurate, complete and maintained in a manner that is consistent with and follows OHSU policies and procedures.
- Make sure everyone you supervise, including students and learners, understands and follows their responsibilities for keeping accurate and complete records.
- Always be accurate, complete and truthful when creating any OHSU record or submitting academic, clinical or financial documentation. When documenting something that is assumed but not proven, be clear that you are doing so.
- Avoid exaggeration, guessing, giving a legal opinion or including rude or negative comments about people and their motives.



Each of us is responsible for the information and records under our control and that apply to our roles. We must be ready to provide and describe the accuracy of the record when asked. It is also our responsibility to keep our records organized so they can be accessed when needed.

7

Interacting with our community

Communication with the public

OHSU needs a clear and consistent voice when providing information to the public and the media. For this reason, all public contacts and messages must go through OHSU's Strategic Communications office.

OHSU complies with the Oregon Code of Cooperation published by the Hospital Association of Oregon. This code is designed to facilitate accurate, ethical and timely news coverage of medical and other health-related events. It balances patients' right to privacy and well-being with the public's right to receive information.

Volunteer and community outreach

OHSU maintains close working relationships with its neighbors and the community in general. Contact the Strategic Communications office about volunteer and community outreach activities that may interest other OHSU members or that OHSU might want to officially support.

Guidelines for use of social media

At OHSU, we understand that social media lets us share information, opinions and more with people around the world. However, it also presents risks and responsibilities. Ultimately, you are the person responsible for what you post online. Before posting anything, consider the possible risks. Remember the saying: "The Internet is forever." This means that what you post may be permanent, and others can find and view it even many years from now. Anything you post may affect your work, school performance, other people or OHSU business.



Our responsibilities for communicating with the public






- Only speak on behalf of OHSU if authorized to do so.
- Promptly direct all questions from the media to the [Strategic Communications office](#). This includes all questions on OHSU's activities, plans or position on public issues and any other questions.
- Inform Strategic Communications about the activities and accomplishments of the OHSU community. This allows us to share our success with the OHSU community and the public.
- Be sure you provide accurate information to Strategic Communications and representatives of the media. Be honest about your role and OHSU's role.
- Use OHSU's [Brand Manual](#) to make the most of information about our mission. Ask Strategic Communications for help if you are not sure how to use the guidelines.







Our responsibilities for volunteer and community outreach

Ask Strategic Communications for help and guidance before representing OHSU in any volunteer activities or making a commitment for OHSU involvement.

When using social media in connection with your role at OHSU:

-  Get the approval of OHSU's Social Media department before creating any OHSU social media channels. Remember to follow OHSU and patient privacy guidelines. Violation of these policies could mean your account is temporarily or permanently closed. For more information, please visit the [guidelines for social media under Communications](#) on O2.
-  Only use OHSU logos, trademarks or copyrighted materials when you are specifically told you can do so. When you use them, be sure to follow OHSU's official [brand guidelines](#). If you are not sure something follows these guidelines, please ask.
-  Be careful to post only information that is true and accurate. Avoid posting rumors or anything you know that is false. If you make a mistake, correct it quickly. Be open about any previous posts you have altered. Remember that the internet saves (archives) almost everything. Even posts that you deleted may be brought back.
-  When you communicate online on topics related to your role or OHSU, make clear you are not speaking for OHSU. Identify yourself as a person in the community, not a spokesperson for OHSU. Consider adding a disclaimer to your personal accounts, for example, "Opinions are my own and not those of OHSU."
-  Keep OHSU intellectual property (ideas, research and more) confidential. Do not post or discuss knowledge, technology or anything else you know is being developed at OHSU. These things may be trade secrets, which need to be kept private until they are ready for the commercial market. Trade secrets may include information on the development of systems, processes, products, know-how and technology.

Also keep non-publicly available information confidential. Do not publicly post or share information posted on the OHSU intranet.
-  Do not post confidential internal communications related to OHSU business. These may include, but are not limited to, internal reports, policies and procedures.
-  Do not post academic content, such as videos of lectures or students or learners being taught.
-  Know what your privacy settings are and who can access the content you post online. Remember to review these settings regularly.
-  Posting something that includes discriminatory remarks, harassment, bullying, intimidation, threats of violence or similar inappropriate or unlawful conduct may bring disciplinary action from OHSU, up to and including termination for employees or dismissal for students.

Political involvement and related activities

OHSU recognizes that political involvement is an important part of the community. We support OHSU members' right to be involved in civic and community activities. As OHSU members, you are required by Oregon law to follow the restrictions outlined in this notice:

Political activities

Oregon law and OHSU policies restrict the political activities of public employees while on the job during working hours. Political activity restrictions are detailed in the [Political and Public Activities and Candidates for Public Office Policy \(03-30-003\)](#) and [Relationships with Federal, State or Local Government Policy \(03-30-005\)](#). Policy defines "political activities" as activities that promote or oppose any political committee or any initiative, referendum or recall petition, measure or candidate.



Our responsibilities for government advocacy and communication

- Any communication with executive, legislative or judicial branches of government, outside of what is required in the ordinary course of your role, must go through [OHSU's Government Relations department](#).
- OHSU does not engage in political activity and any questions about political activity should be directed to the [OHSU Legal Department](#) or [OHSU Government Relations](#).



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.

8

Working with our external business partners

Vendor relationships and management

Our vendors and external business partners are an important part of OHSU's success. To create an environment where our vendors want to continue working with us, they must be confident that they will be treated fairly, that we will work with them in partnership to address challenges, and that we will follow standards for right and wrong behavior.

OHSU buys supplies and services from vendors based on need, quality, community benefit, service, price and terms and conditions. We select significant vendors and contractors through the appropriate and transparent procurement process, including informal and formal bidding processes. We believe in doing business with those who share our commitment to community as well as our high standards of ethical business conduct. OHSU does not keep prices at a set level (fix prices), divide geographic markets or make any agreement that may artificially raise the prices of OHSU services or otherwise block competition.

We must be sure to research our vendors and business partners. Specifically, we must know who they are, what they do and what they are doing for OHSU. They must understand that they are required to follow OHSU standards when they work with us, and to keep compliant, complete, and accurate records.



Our responsibilities when conducting business with our external business partners

- Respect and protect vendors' confidential information and information that they own.
- Make sure each contract has been properly reviewed, negotiated and signed by the appropriate [OHSU Contracting Unit](#). This will ensure that each contract has the proper legal language, and it is executed by an OHSU representative that holds contractual signature authority.
- Inform the public and our vendors about OHSU's services and responsibilities.
- Observe fair business practices that accurately reflect OHSU's skills and accreditations.

Vendor diversity



We actively encourage, promote and support the use of small and diverse businesses in our supply chain through close collaboration with internal teams, external organizations and partners.



We support our local community and work to maintain a strong vendor base that reflects the diversity of the overall vendor community, including but not limited to business enterprises that are owned by individuals who identify as minority, women, veteran, or disabled.



We create partnerships with organizations and businesses that have practices in line with diversity, equity, inclusion, and belonging.

**During the formal process of choosing vendors:**

- Select services on the basis of quality, effectiveness, economy, community benefit and appropriateness. Choose vendors to meet needs we have identified, while also seeking to avoid unnecessary expense.
- Identify whether the vendor is part of the Disadvantaged Business Enterprise (DBE) program such as certain minority- or women-owned businesses.
- Require vendors to share their diversity, equity, inclusion, and belonging commitments, policies and practices as part of the selection process.
- Follow fair business practices in negotiating contracts before signing a contract or making a purchase from a vendor.
- Do not give or accept any bribes, kickbacks (where the vendor gives back part of your payment as a favor for giving them the business) or other improper payments. Federal and state laws specifically make it a crime for anyone to offer or accept a bribe, kickback or anything of value for referring patients or other business.

**If you are in a leadership position at OHSU:**

- Work with our vendors and other external business partners to make sure that they understand our standards for high performance in meeting standards of right and wrong (ethics) and following appropriate rules and procedures (compliance).
- Watch out for any signs that our vendors are violating applicable laws or regulations.
- Insist on honest accounting for time and materials and receiving the product OHSU paid for on time and meeting our standards.
- Be open about any situation that may appear to involve a conflict of interest (see Conflicts of Interest section).

When in doubt, contact OHSU's Contract Triage Analyst (contract-triage@ohsu.edu) or [Contracting Unit](#) to make sure each contract includes proper language and includes someone with the authority to sign a contract. Do this as early as possible when you need a contract negotiated by OHSU.

Determining conflicts of interest

A conflict of interest happens when you have an interest that influences the decisions you make in your role at OHSU. For example, you might have a conflict of interest if you are involved in something that benefits a non-OHSU person or company. The decision may benefit you, a friend or relative or a vendor, but may not be in the best interest of OHSU.

It is impossible to describe every potential conflict, but the following are some examples.

Business opportunities

As part of working at OHSU, all OHSU members have assigned to OHSU all right, title and interest to anything they create as part of their job (intellectual property) if they used OHSU time or equipment to do it. This means anything you created during your normal OHSU working hours or using OHSU equipment. It also means anything created using OHSU supplies, space (facilities) or restricted information. All OHSU members and the people who represent them, such as attorneys (their agents) should work with [OHSU Technology Transfer](#) before talking with any non-OHSU person or company about something created at OHSU. The OHSU [Collaborations and Entrepreneurship](#) department helps make sure people and companies outside OHSU can easily connect with the OHSU community.

Outside activities

Activities you perform outside OHSU, such as consulting, being on the board of another organization or working at another job, can create a conflict of interest or conflict of commitment. For example, outside activities may get in the way of your ability to do your OHSU job or affect your role as a student.

The non-OHSU activity could:

- Lead to sharing restricted or confidential information.
- Lead to sharing information on something created at OHSU.
- Have a negative effect on OHSU's reputation, if something negative happens and people know you work or study at OHSU.
- Give you a chance to make money from something that is not yours, such as restricted or confidential OHSU information or something created at OHSU that OHSU owns.
- Impact your physical health in order to perform your OHSU job or academic related duties and responsibilities safely and efficiently.

If you provide services to other people and companies that are similar to your role at OHSU, talk with your supervisor and use the [online Conflict of Interest system](#) to report the outside activity.



You have a conflict of interest when:

- You are trying to form a business agreement or contract with a company that you also have a financial interest in.
- You are the direct supervisor for one of your relatives.
- You have influence over the pay, benefits, career progression or performance of a relative.



Our responsibilities for conflicts of interest

- Avoid conflicts of interest whenever possible.
- Make decisions that are in the best interest of OHSU.
- Talk to your supervisor or the [Conflict of Interest Office](#) if you think you might have a conflict of interest. Tell them the details of any situation you are involved in, and ask if your non-OHSU interests could be in conflict with OHSU interests.
- Ask about possible conflicts of interest before they become a problem. Be completely honest about situations that might cause a conflict of interest.
- Regularly consider if you might have a new conflict of interest or possible conflict. If you have income or benefits from non-OHSU companies, check to make sure you do not have a conflict of interest with OHSU. Disclose any possible new conflicts and non-OHSU sources of income with your supervisor and update your [Conflict of Interest](#) disclosure.

Significant financial interests

When OHSU members receive money from another business or company, there can be a possible conflict of interest. For example, you might have the opportunity to make or receive money from an organization that does business with OHSU, wants to or competes for business with OHSU. If so, you are required to talk with your supervisor about this potential conflict. You may not be included in OHSU's decisions about that business, because you could appear to be influenced by the desire to make money from the business relationship, whether it benefits OHSU or not.

You must also share any financial interests related to research or patient care. For example, if you own stock in a drug company, you must record this possible conflict of interest in the online [Conflict of Interest system](#).

Family members

Employees may not hire relatives or put them in certain job positions without the approval of Human Resources and their supervisor. This situation could create a conflict of interest. Please read [Employment of Family Members Policy \(03-05-040\)](#), for more information.

Recognizing and managing gifts and entertainment

OHSU depends on major gifts and donations to support our mission and growth. However, gifts may only be made to OHSU as an organization. They must also be given in ways that follow laws and rules.

OHSU must be careful to avoid any situations that may look like the gift giver will receive an unfair advantage. This is particularly important when vendors make gifts to OHSU. The people who choose OHSU vendors and those who raise funds for OHSU should have only a business relationship, not a personal one. This helps avoid situations where it appears that OHSU chose a vendor because the vendor gives gifts or provides benefits to OHSU.



For more information, please refer to the [Conflict of Interest manual](#), [Disclosure requirements](#), [Acceptability Criteria for Outside Activities](#), and more information on how potential conflicts of interest may affect you.



Situations involving gifts can be complicated, but for us one principle is always clear:

We do not offer, ask for (solicit) or accept gifts or entertainment that may appear to influence OHSU decisions or that may actually influence what OHSU does.

9

Our responsibilities to the law: Working with federal, state and local authorities

Communicating and cooperating with regulators and investigations

OHSU is entitled to all the safeguards provided by law. At the same time, we will cooperate with lawful, reasonable requests for information about what we do from federal, state and local authorities.

Government contracting

OHSU does business with governments and organizations managed by the government. Our policy is to fully obey all the laws and rules that apply to doing business with government entities.

OHSU leaders who supervise work with governments and organizations managed by the government must always be aware of the latest rules and OHSU requirements that apply to their work.

Gifts and entertainment of government representatives

Extra care is important when dealing with government officials. There are federal and state laws about ethics and lobbying. These laws describe how we are allowed to interact with government officials and their staff. Never offer any gift or other benefit, such as entertainment, to a government official.

Reasons why gifts are prohibited:

- It could be thought of as affecting business decisions they make about OHSU.
- It could be thought of as giving OHSU an unfair advantage with the government.

Kickbacks and inducements

The Federal Anti-Kickback Statute and various similar state laws prohibit giving, getting, offering or asking for anything of value to get a patient to receive care or someone to send business to OHSU. You must examine all relationships and arrangements with people and businesses who might refer patients to OHSU or want us to choose their products. You must be certain no money or favors are exchanged for sending patients to OHSU or using products. Health care departments should avoid giving discounts or allowing people to see a health care provider without paying the usual charges, such as a copayment, without talking with the Clinical Integrity, Revenue Cycle or Patient Relations departments first.



Individuals working for OHSU on government projects:

- Must obey OHSU standards in their work.
- Must follow their OHSU government project contract (contractual obligations).
- Must keep complete, accurate records of their work.



Our responsibilities to the law

- Fulfill your work-related responsibilities in a manner that is compliant with applicable laws and regulations.
- Respond to inquiries from enforcement authorities (regulators) or government authorities that you may receive during the course of your role. Respond by stating that OHSU intends to cooperate but that the matter must first be discussed with the [OHSU Legal Department](#).
- Take prompt action to preserve documents that may be relevant when we are told about an external investigation or lawsuit. The appropriate OHSU member or department will let you know if you need to do anything to assist.
- Stay informed about new requirements that may affect your area.

Laws and regulations may be complicated and difficult to understand. Be sure to discuss any questions you have with your supervisor, contact the [OHSU Legal Department](#), or both.

Anti-corruption and bribery

The U.S. Foreign Corrupt Practices Act, the laws of the European Union and the laws of most countries in which we operate have laws against bribing foreign officials. Many countries also have laws that address bribes paid to private individuals.

The laws against corruption and bribery are complicated. OHSU members should be aware of the laws and ask questions if they are not sure exactly what to do. If you have questions, contact your supervisor, Academic Program (for students) or the OHSU Legal Department.



You must immediately report any suspicious activity or demands by any government official, like inappropriate payment requests or threats if you don't do what they want. Report this to the [OHSU Legal Department](#) or the [Integrity Helpline](#).



Our responsibilities when dealing with government and regulatory agencies.

- Never offer, provide, promise to offer or authorize payment of money or any valuable item to get business or influence a business decision.
- Never make payments that are intended to affect a foreign official's or government decision.
- Remember that the phrase "foreign or government official" means more than politicians and civil servants. It also means officials of state-owned or controlled commercial businesses, representatives of public international organizations, employees of public universities and research institutes, people running for elected office in their country, political parties and party officials.
- OHSU can still be responsible for breaking the law even if someone else pays a bribe. Be aware of common warning signs when dealing with foreign or government officials and third parties including:
 - Large sums of money paid to third-party agents or consultants.
 - Unreasonably large discounts to third-party distributors.
 - Third-party "consulting agreements" that do not include a clear, detailed description of the services provided and include only vaguely described service.
 - Third party consultants who do a different type of work than what they are being paid for.
 - Third parties who are related to a foreign or government official or closely associated with them.
 - The foreign official specifically asked for the third party to be involved in OHSU's business with the country.
 - The third party is not a real company, just a company name registered outside the U.S. and the country doing business (offshore jurisdiction).
 - The third party asks us to make payments to offshore bank accounts (outside the U.S. and the country doing business with OHSU).

Contact the [Integrity Department](#) or [OHSU Legal Department](#) if you become aware of any unethical conduct.

Fraud, waste and abuse prevention and the False Claims Act

OHSU is responsible for the appropriate management of the money and other resources it receives from the government for patient care, research and education. OHSU takes fraud, waste and abuse seriously. We follow all laws and regulations that are designed to prevent and find fraud, waste and abuse in government programs.

OHSU is committed to submitting claims that are accurate and truthful. OHSU has many policies and procedures designed to prevent improper or erroneous billing to government benefit programs. Clinical Integrity and other staff in all missions regularly review charges and claims submitted to the government to ensure accuracy.

One of the main differences between fraud, waste and abuse is intent and knowledge. Fraud requires intent to receive payment dishonestly and the knowledge that the actions are wrong. Waste and abuse may also involve receiving an improper payment or creating an unnecessary cost, but it is not done with the same intent and knowledge.

The False Claims Act “whistle blower” or “qui tam” provisions

A U.S. law called the False Claims Act allows people to sue in the name of the government for violations of the Act. The government may or may not choose to investigate what is told to them. If it does not act, the person who filed the suit has the right to sue without the government being involved. If a false claim was filed and the organization must pay the money back, then the person who filed the suit may receive part of it because they shared information about a false claim.

If you are concerned about a specific claim, you have many options for bringing this to the attention of OHSU. The False Claims Act does not require you to report your concerns to OHSU first. However, OHSU asks that you tell us if you suspect false claims are being made. This will allow us to review the information, investigate, fully understand and correct the situation promptly and appropriately.

Contact the [Clinical Integrity Department](#), the [OHSU Legal Department](#) or file an [Integrity Helpline](#) report you have any questions or concerns about false claims.



Report fraud, waste, and abuse immediately to the [Integrity Helpline](#) (1-877-733-8313 or [ohsu.edu/helpline](#)). You will not face a penalty or negative consequences for honestly reporting suspected fraud, waste or abuse.



It is against federal and state law to punish, discipline, discriminate against (treat differently) or retaliate (create negative consequences) against someone because they report or share information on false claims. It is also against the law to treat them in these ways if they start a process of action to investigate false claims.

If you believe you have faced illegal discipline, discrimination (different treatment) or retaliation (negative consequences), you may file a complaint with the [Integrity Helpline](#) or the [Oregon Bureau of Labor and Industries](#).



Our responsibilities for preventing fraud, waste and abuse

- Only bill for services that were actually provided to the patient or the costs you are allowed to bill for based on what was done. Make sure all codes are accurate and all financial reports, technical reports and bills sent to the government and other organizations are accurately documented.
- Never do anything illegal or inappropriate that could lead to a false claim for payment. Illegal and inappropriate practices may include but are not limited to:
 - Making a patient's diagnosis seem different than it is in order to charge for more expensive services or more services.
 - Billing separately for services that should be billed together in order to get more money for each service.
 - Billing for care that the patient did not really need.
 - Charging costs to a grant that the grant is not allowed to pay for.
 - Agreeing or signing your name to a statement about someone's effort when you know it is not true.
 - Charging things to a grant fund for the specific purpose of spending all the grant money ("spending it out").
- All bills should be based on what is documented about the services and supplies provided. There should always be documents to back up the reason for the bill. Follow all policies related to billing and documentation.
- Never submit a false claim for payment. The Federal False Claims Act prohibits knowingly submitting a false claim to a federal payer for reimbursement.
- Vendors and Business partners are required to notify us immediately if they have been excluded or debarred (prevented) from participating in federal health care programs for any items or services they furnish, order or prescribe.

Insider trading

During our work for OHSU, we may hear information about publicly traded companies. It is important to know that we are prohibited from trading in shares of stock or bonds, or passing information on to other people (this is called "tipping") who trade shares of stock or bonds based on what we told them. Trading stocks or bonds based on information that is not publicly available to ordinary investors is called "insider trading." Refer to the [OHSU Board of Directors Insider Trading Policy \(2003-09-12\)](#) for more information.



Our responsibilities for insider trading

- Do not buy or sell securities (shares of stock, bonds) of any company on the basis of information that is not available to the general public.
- Be especially careful what you say or write when you respond to requests for restricted information, even from OHSU's business partners, strategic alliances or other vendors. Even casual conversation could be viewed as "tipping" of inside information.

10

Code of conduct and you

Code of conduct and you

Our Code of Conduct provides a framework to guide us in making ethical decisions and acting with integrity when interacting with and supporting our coworkers, students, learners, patients and broader community.

As an OHSU member, it is your responsibility to:

- Read, understand and follow the Code and other OHSU policies and procedures.
- Abide by the principles of the Code.
- Ask questions regarding the contents of the Code and understand how the contents relate to your role at OHSU.
- Seek guidance from your manager, academic program, the Legal or Integrity departments, or other relevant subject matter experts to ensure you have a well rounded perspective.
- Carefully consider your decisions and the potential impact on OHSU members, patients, visitors, and the communities we serve.

Effective communication of the OHSU Integrity Program across all levels of the organization is crucial. Integrity is a shared responsibility, and each of us plays a role in upholding its principles.

By fostering a culture of open communication and collaboration, we can ensure that our Integrity Program is well-understood and effectively implemented throughout OHSU.



The Integrity Department welcomes constructive input regarding the Integrity Program and the Code of Conduct. If you have any comments, suggestions, or questions, please submit them to the Integrity Department. Your feedback is valuable in helping us continuously improve and strengthen our compliance efforts.

Contact the Integrity Department:

Phone: 503-494-8849

Email: integrity@ohsu.edu

Raise a concern: ohsu.edu/helpline

11 Glossary

Glossary

Abuse

Pertaining to Fraud, Waste and Abuse, abuse is defined as actions that can cost government programs money unnecessarily. Abuse usually means billing for items or services when the patient and health care provider should not, by law, receive them. Abuse is different from fraud because the provider did not intend to deceive the program in order to get the higher payment.

For more information review the [OHSU Integrity Booster, Fraud, Waste and Abuse O2 page](#).

Anti-racist institution

“An antiracist institution is an institution that creates policies, practices, and procedures to actively promote racial equity and justice.” (Kendi, Ibram X. How to be an antiracist. One world, 2019)

Learn more in [OHSU's Institutional Anti-Racism Guidebook](#).

Bullying

Bullying can be harmful words or actions that humiliate, degrade, demean, intimidate, and/or threaten a person or people.

Learn more in [OHSU's Prohibition on Bullying Policy \(03-05-606\)](#).

Discrimination

Discrimination is when someone treats people in unfair or harmful ways because they belong to, or appear to belong to, a protected group or characteristic. Discrimination can be any behavior that affects employment, education or treatment or that creates a hostile environment. (OHSU Office of Civil Rights Investigations and Compliance)

Learn more in OHSU's [Discrimination, Harassment and Retaliation Policy \(03-05-048\)](#).

Discriminatory misconduct

Conduct that includes Discrimination, Harassment, Sexual Harassment, Sexual Misconduct, Sexual Assault, Domestic Violence, Dating Violence, Stalking, and Sexual Exploitation, and Retaliation.

Learn more in [OHSU's Discrimination, Harassment and Retaliation Policy \(03-05-048\)](#).

Fraud

Lying about something or making it appear different than it really is, on purpose in order to gain something by deception. Fraud is intentional and results in a dishonest profit or benefit for the person, company or other organization that commits the fraud. Medicare defines fraud as “knowingly and willfully executing (doing), or attempting to execute, a scheme or artifice (fakery) to defraud (steal from) any health care benefit program.” This definition is supported by a U.S. law called the Health Care Fraud Statute (18 U.S.C. § 1347). This law makes fraud a criminal offense.

For more information review the [OHSU Integrity Booster, Fraud, Waste and Abuse O2 page](#).

Harassment

Harassment is a form of discrimination that targets a person or a group of people. Harassment can be verbal, visual, physical or any other type of behavior that intimidates, threatens or creates a hostile environment.

Learn more in [OHSU's Discrimination, Harassment and Retaliation Policy \(03-05-048\)](#).

Hostile Environment

A hostile work or learning environment is one where there are frequent or severe events of prohibited behavior. The behavior may be verbal, non-verbal or physical. An employer, teacher, co-worker, vendor or fellow student can create a hostile environment. For more information refer to [OCIC Civil Rights Policies and Resources](#).

Insider Trading

OHSU bonds and other obligations issued under or pursuant to its Master Trust Indenture (“OHSU Bonds”) are securities for purposes of the application of Insider Trading Laws (the Insider Trading and Securities Fraud Enforcement Act of 1988). [OHSU Board of Directors Insider Trading Policy](#) sets out restrictions on the trading of OHSU Bonds by OHSU Directors, officers and employees of OHSU.

Integrity

To commit to a set of values and principles and consistently acting in an ethical and honest way.

Learner

A person who is enrolled as a student in an academic program leading to a certificate or degree or who is a participant in a training program.

Microaggression

Commonplace daily verbal, behavioral, or environmental indignities, whether intentional or unintentional, that communicate hostile, derogatory racial slights. These messages may be sent verbally, ("You speak good English"), non-verbally (clutching one's purse more tightly around people from certain race/ethnicity) or environmentally (symbols like the confederate flag or using Native American mascots). Such communications are usually outside the level of conscious awareness of perpetrators.

Learn more in [OHSU's Inclusive Language Guide](#).

Political activities

Activities for or against (promoting or opposing) any political committee or any initiative, referendum or recall petition, measure or candidate. Political activities do not include activities for or against (promoting or opposing) proposed legislation that may become law, unless the proposed legislation is one that results in a referral to an election.

Learn more in OHSU's [Political and Public Activities and Candidates for Public Office \(03-30-003\)](#) and [Relationships with Federal, State or Local Government \(03-30-005\)](#) policies.

Protected Health Information (PHI)

Individually identifiable health information, including demographic data, which either identifies the individual or for which there is a reasonable basis to believe such information can be used to identify the individual and relates to:

- (1) the individual's past, present, or future physical or mental health or condition;
- (2) the provision of health care to the individual; or
- (3) the past, present, or future payment for the provisions of health care to the individual.

PHI does not include employment records that are maintained by OHSU as an employer or education and other records subject to, or defined in, the Family Educational Rights and Privacy Act.

Racism

A system of inequality in which discrimination on the basis of race is institutionalized.

For more information review the [OHSU Institutional Anti-Racism Guidebook](#).

Restricted Information

Includes all information that OHSU has a contractual, legal, or regulatory obligation to safeguard in a specified manner. In some cases, a breach or loss of this data would require OHSU to notify the affected individual(s) or regulatory authorities. Restricted Information must be protected against unauthorized disclosure or modification and should only be used as necessary for business purposes. For more information, see [ISP-02, Data Classifications](#) for details.

Retaliation

Retaliation is a serious offense that can result in disciplinary action.

Retaliation is a negative action taken against an OHSU member because they reported a concern, took part in a protected activity or were part of an investigation. (OHSU Office of Civil Rights Investigations and Compliance)

Learn more in [OHSU's Discrimination, Harassment and Retaliation Policy \(03-05-048\)](#).

Student

An individual formally admitted and matriculated into an OHSU or joint OHSU/ partner institution academic degree or certificate program; or an individual registered and currently enrolled in an OHSU academic course.

Waste

The Centers for Medicare and Medicaid (CMS) defines “waste” as practices that are not needed and cost Medicare money that did not need to be spent. Waste is generally not considered criminal, but it is a misuse of resources.

For more information review the [OHSU Integrity Booster, Fraud, Waste and Abuse O2 page](#).

