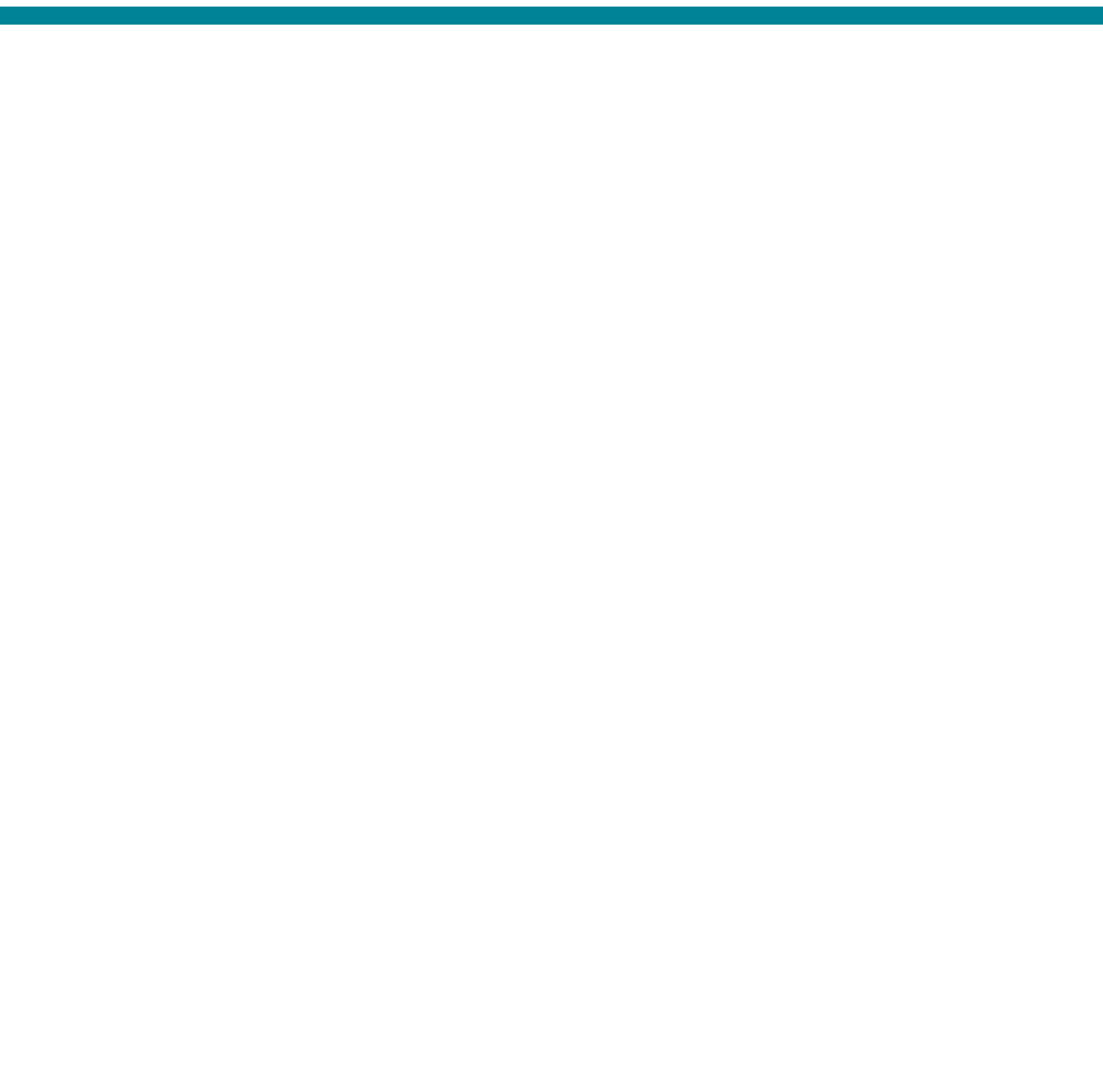


Office of Institutional Integrity and Awareness

Contents

Our Values.....	4
Integrity and Awareness Approach.....	7
Mission and Vision.....	8
Strategic Goals.....	11
Elements of an Effective Compliance Program.....	12-13
Awareness.....	14
Code of Culture.....	17
Policy and Procedure Management.....	18
Minors on Campus.....	21
Integrity and Awareness Education.....	22
Conflicts of Interest.....	25
HSC Trust Line.....	26
Investigations.....	29-30
Privacy.....	33
Health Care Compliance.....	34
Contact.....	35





Integrity and Awareness Approach

The Office of Institutional Integrity and Awareness creates an integrity-based approach program that emphasizes responsibility for ethical behavior and commitment to our Code of Culture.

An integrity-based framework consists of three essential pillars: (1) instruments (e.g. ethics code, conflict-of-interest policy, whistleblowing arrangements); (2) processes (development planning, implementing, evaluating and adapting); and (3) structure (appointing responsibility and coordination). Management of this framework undertakes activities to address new and emerging risks with both a proactive and reactive approach. These pillars create a framework outline and dimensions:

1. **Determining and defining integrity**
2. **Guiding toward integrity**
3. **Preserve a culture of integrity**
4. **Fair and appropriate procedures and sanctions**
5. **Monitor external context (reputation, audit and legal)**

The integrity-based approach to compliance is a conscious process by HSC that emphasizes responsibility and integrity for ethical behavior and commitment to our Code of Culture approach. The program is driven by principles, values, leadership, organizational expectations and legal regulations. By using this proactive approach, we demonstrate the consistency of Our Values in action with choices and decisions as an institution and individually.

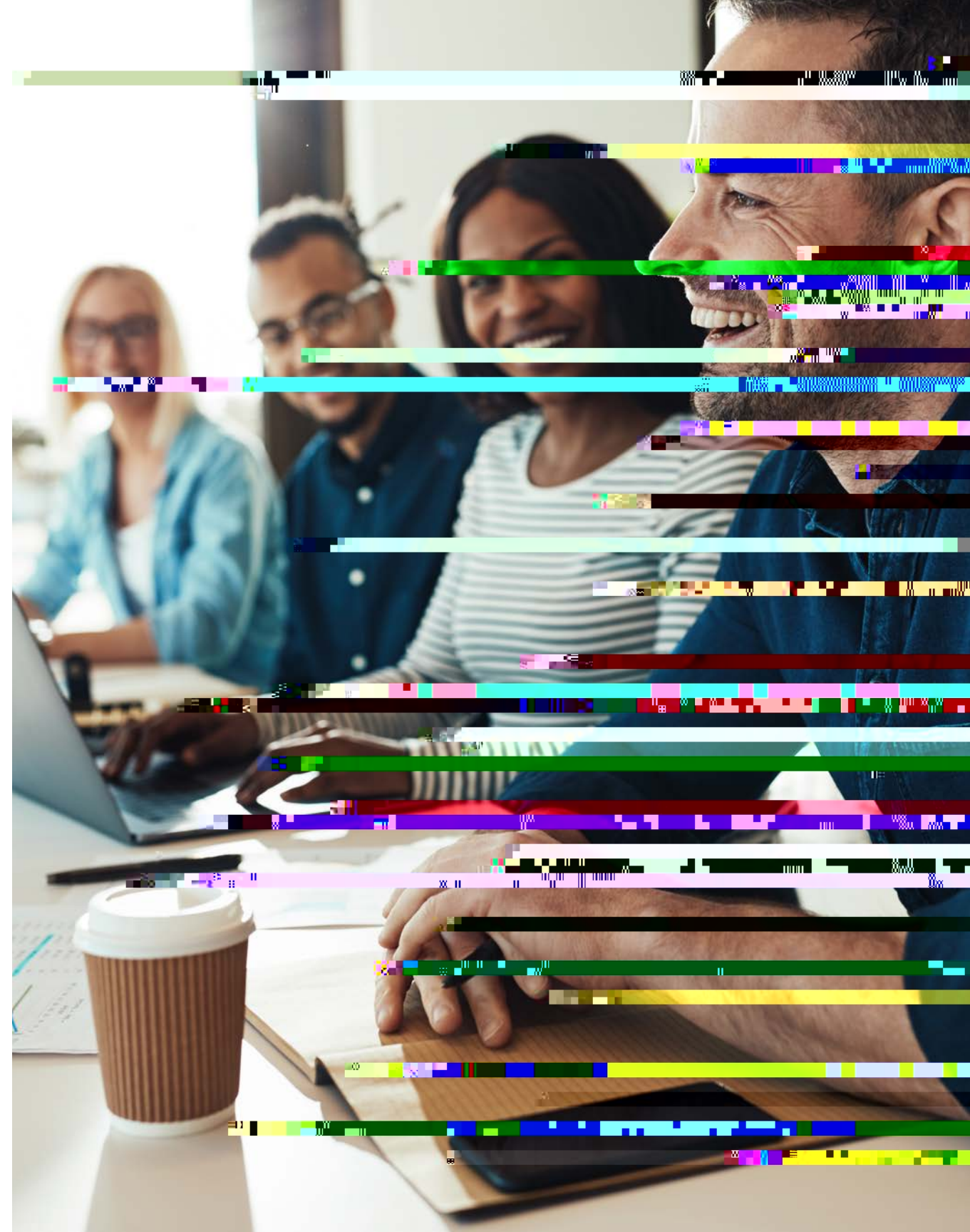


Mission & Vision

Who We Serve: Students, employees, vendors, agents and external community members.

The mission of the Office of Institutional Integrity and Awareness is to create solutions that build and preserve an ethical culture.

Our vision is to cultivate a purpose-inspired integrity and awareness program that will enable our team members to better succeed in their operations, risk management and decision-making for which they are individually and collectively accountable.





Strategic Goals

People: Promote the Integrity and Awareness Program through education, creation of efficient policies and procedures, and preservation of the Code of Culture as a living document.

Programs: Increase the exposure of the Integrity and Awareness approach.

Strengths: Elevate campus behavior that is governed by Our Values, mission, vision and purpose.

Elements of an Effective Compliance Program



Implement written policies and procedures



Designate compliance officer and compliance committee



Conduct effective training and education



Develop effective lines of communication



Conduct internal monitoring and auditing



Enforce standards through well-publicized disciplinary guidelines



Respond promptly to detected problems through corrective actions

The Office of Institutional Integrity and Awareness engages employees and students to be mindful of topics about compliance and integrity by planning

The Office of Institutional Integrity and Awareness helps connect HSC's mission to the daily actions of its team members by ensuring access to all institutional policies. HSC policies are intended to support a safe, respectful and ethical learning and work environment for everyone. The Office of Institutional Integrity and Awareness



Minors on Campus

HSC provides opportunities for young inquisitive minds through programs aimed at educating and promoting interest in health professions. These programs introduce youth to emerging technology and transferable skills that will help them pursue careers in the medical sciences.

To promote health, wellness, safety and security of youth, HSC must comply with all federal and state laws. The Office of Institutional Integrity and Awareness oversees the Minors on Campus process and participation requirements. This includes, but is not limited to, event and program registration, staff ratios, consent forms and criminal background screenings.

We also provide education and guidance on sexual abuse and child molestation training as prescribed by the Texas Department of State Health Services. This training includes reporting suspected abuse, prohibition of certain kinds of physical and verbal interactions, and one-on-one contact with minors.



Integrity and Awareness Education

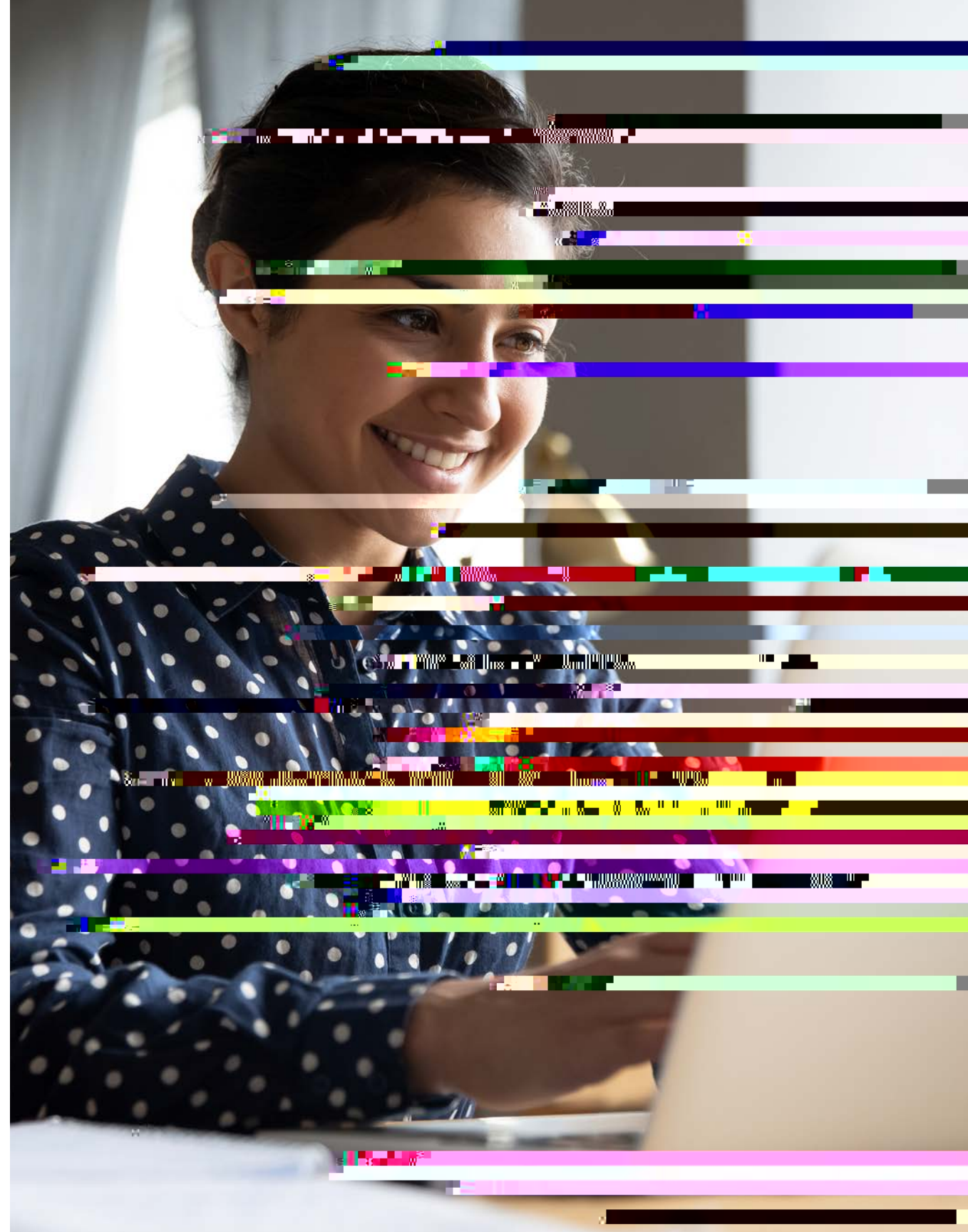
HSC Integrity and Awareness Training is intended to demonstrate the commitment of HSC to the highest standards of ethics and compliance. Applicable laws, policies and regulations require all employees and students to complete mandatory compliance and other required training annually or when an employee receives notification.

Initial (New Hire) Training: Integrity and Awareness Training and any specialized training must be completed within the first 30 days of employment.

Employee Mandatory Training: All employees must complete annual mandatory training and will be given a minimum 30-day advance notice to comply.

Specialized or Job-Specific Training: Department managers should contact the Office of Institutional Integrity and Awareness to assign specialized training.

Student Mandatory Training: This training is assigned to all students annually in the spring semester.





Conflicts of Interest

The participation of employees in external activities that enhance their professional skills or constitute public service can be beneficial to HSC as well as the individual employee. External activities may lead to conflicts of interest.

In accordance with HSC policy, an employee must disclose conflicts of interest annually on the HSC Conflicts of Interest eDisclosure Form. Additionally, conflicts of interests related to research programs require the disclosure of certain financial interests for employees engaged in the design, conduct or reporting of research.

The Office of Institutional Integrity and Awareness helps provide guidance to protect employees from undue suspicion of their external activities that may adversely influence institutional operations.

If an institutional conflict is substantiated, a management plan that outlines and implements measures will be developed by the Chief Integrity Officer and the employee's manager. In the case of a research conflict of interest, the Research Conflict of Interest Committee will develop the management plan.

HSC Trust Line

HSC encourages employees and students to report any suspected compliance concerns. The Trust Line is publicly available on the HSC website. You may also directly contact the Integrity and Awareness Office or Chief Integrity Officer.

Examples of reportable concerns include, but are not limited to, illegal or fraudulent activity, financial misstatements or irregularities, conflicts of interest, unethical conduct, and violations of laws, policies and regulations.

The HSC Trust Line provides a confidential resource for employees and students to report suspected wrongdoing in a manner that preserves anonymity and assures nonretaliation. The HSC Trust Line is operated by a third-party vendor and is available 24 hours a day and 365 days a year. All concerns will be forwarded to the Office of Institutional Integrity and Awareness, which will promptly address the allegation and will inquire and investigate as appropriate. The Trust Line is not intended to discourage HSC team members from addressing their concerns with their direct supervisor, Student Affairs or Human Resources.



Non-Retaliation and Protection from Retaliation

HSC does not tolerate retaliatory behavior. Retaliation is the treatment or condition likely to dissuade a reasonable person from reporting, causing to report or from participating in an investigation of suspected misconduct or a related proceedings, including an action that affects an individual's enrollment, academic progress or business relationship; or an employee's compensation, promotion, transfer, work assignment or performance evaluation. The Office of Integrity and Awareness will review complaints of retaliation and any attempted or actual retaliatory action.

All employees and students have the right to make a "good faith" report of suspected misconduct to the appropriate authority. An employee or student who comes forward in good faith to report actual or suspected misconduct will not be subject to retaliation. **This protection does not extend to self-reported violations.** Team members are prohibited from retaliating against any person or relative of any person who is an employee or student who reports suspected wrongdoing, cooperates with a compliance investigation, or seeks guidance about compliance concerns in good faith.

Any employee who believes he or she is experiencing retaliatory action by another individual as a result of good faith reporting, participation in an investigation and/or filing a complaint is strongly encouraged to report this to the Office of Institutional Integrity and Awareness.

Individuals found to have engaged in retaliation are subject to immediate disciplinary or administrative action, including termination of employment. Students will be subject to the disciplinary process in accordance with the Student Code of Conduct and Civility.

An employee is subject to disciplinary action up to and including termination if they make a false report of retaliation, actual or suspected misconduct, or knowingly provide false answers or information in response to an ongoing investigation.



Desiree K. Ramirez, CCEP, CHC
Senior Vice President and Chief Integrity Officer
desiree.ramirez@unthsc.edu |

Health Care Compliance is the ongoing process of ensuring that legal and regulatory guidance provided by the Department of Health and Human Services (HHS) Office of Inspector General and other federal and state agencies are met in the delivery of patient care, billing and reimbursement. HSC complies with all applicable federal and state health care billing laws and regulations.

The Office of Institutional Integrity and Awareness audits medical records, monitors risks and detects anomalies in health care record documentation. Coding and billing strategies are implemented to guarantee documentation supports the information reported that minimizes billing compliance risks, optimizes revenue, and prevents fraud, waste and abuse in medical claims.

Clinical providers are ultimately responsible for the accuracy of medical claims filed for services. Medical services must be recorded according to guidelines and instructions; every effort must be made to ensure that coding is accurate.



Office of Institutional
Integrity & Awareness

3500 Camp Bowie Blvd.

Fort Worth, Texas 76107

Phone: **817-735-2461**

Fax: **817-735-0615**

unthsc.edu