HSC OP: 70.52, Compliance Code of Conduct for Federal Healthcare Programs

PURPOSE: The purpose of this Health Sciences Center Operating Policy and Procedure (HSC OP) is to establish a standard of conduct for all employees, residents and faculty that promotes the highest level of ethics and integrity possible in all education, patient care, fiscal, administrative and research activities.

REVIEW: This HSC OP will be reviewed annually on January 15 by the Assistant Vice President for Human Resources (AVPHR) and the Institutional Compliance Officer, with recommendations for revisions forwarded to the Executive Vice President by February 1.

POLICY/PROCEDURE:

1. TTUHSC and its employees are committed to compliance with all applicable federal and state statutes and regulations relating to the Federal Health Care Programs, including a commitment to prepare and submit accurate reimbursement claims consistent with said statutes and regulations.

2. TTUHSC requires all applicable employees and residents to comply with federal and state statutes and regulations and with Texas Tech’s own policies and procedures relating to Federal Healthcare Programs, including any relevant subsequent requirements in the future.

3. TTUHSC employees and residents are required to report through the Institutional Compliance Program any suspected violations of any applicable Federal Healthcare Programs’ statute or regulation or to Texas Tech’s own related policies and procedures. This reporting may be done through the TTUHSC Compliance Hotline (877-543-7344).

4. The potential consequences to both TTUHSC and to any employee or resident as a result of any failure to comply with the applicable Federal Healthcare Program requirements and/or with TTUHSC’s own related policies and procedures or any failure to report such non-compliance may include criminal, civil and administrative liability to the federal government, as well as employee or resident disciplinary action, including termination, by TTUHSC.

5. There will be no retaliation against any employee or resident who makes a good faith disclosure report of a suspected violation to the TTUHSC Institutional Compliance Program.

6. All employees, residents and faculty will be provided a copy of the Code of Conduct.

7. TTUHSC reserves the right to interpret, change, modify, amend or rescind this policy in whole, or in part, at any time, without the consent of employees.

References:
- TTU System Regents’ Rules, Section 03.01, Ethics Policy
- TTUHSC OP 70.31 Standards of Conduct, Discipline and Separations of Non-Faculty Personnel
- TTUHSC OP 10.07 Reporting a Violation of Law
- TTU System Regents’ Rules, Section 07.03, Fraud Policy