

**2019-2020 Code of Professional Conduct  
Saint Louis University Medical Center**

Effective Date: July 1, 2019

Responsible University Official: Robert Wilmott, MD, Dean and Vice President for Medical Affairs

**1.0 Introduction:**

The Mission of the Saint Louis University Medical Center (the “School”) is the pursuit of excellence in education, research, clinical care, and community engagement through professional development, collaboration, and social justice. In support of its Mission, the School embraces integrated activities internally and externally in basic and clinical research, the provision of patient-centered, compassionate, culturally competent health care, and engagement with the community through public service. Grounded in an understanding of the scientific method and an appreciation for personal commitment and service to others, these diverse educational experiences prepare individuals for careers and leadership roles in medicine and the medical sciences.

In furthering this Mission and pursuing excellence in their many endeavors, the members of the School community are guided by a shared commitment to behavior that adheres to the highest ethical standards and that is consistent with the ideals of Saint Louis University (the “University”), including the Jesuit notions of serving as women and men for others and *cura personalis* (care of the person). The School has developed this Code of Professional Conduct (this “Code”) to describe ways in which faculty and staff of the School, through their everyday activities, interactions, and conduct, foster an academic community that exemplifies the University’s values and promotes civility, in keeping with the *cura personalis* standards.

**2.0 Purpose:**

The School’s Strategic Plan specifies that we are a learning organization that demonstrates continuous quality improvement, maintains a professional culture of accountability, and demonstrates our *cura personalis* values. The University and the School have policies, standards of conduct, and procedures that govern the relationships between the School and the members of the community. This Code is intended to underscore the expectations for professional conduct by faculty and staff at the School. This Code is consistent with and does not replace existing University and School policies.

**3.0 Personnel Affected:**

This policy applies to all faculty and staff of the School of Medicine and the Center for Advanced Dental Education, including full-time, part-time, endowed faculty, post-doctoral fellows, and staff serving in clinical, research, and academic capacities.

**4.0 Code of Professional Conduct Policy:**

**4.1 Expectations**

Faculty and staff at the School are expected to:

1. Uphold the University’s policies and standards of professional behavior.

2. Provide full cooperation with the University's compliance efforts and the School of Medicine's Office of Professional Oversight.
3. Treat all staff, students, trainees, volunteers, patients and their families, research subjects and their families, faculty, and health care professionals with respect, civility, and collegiality, and without bias based on color, age, sex, race, ethnicity, national origin, religion, disability, military/veteran status, sexual orientation, or gender identity.
4. When in the learning environment provide clear direction and timely feedback, as well as constructive suggestions and opportunities for improvement or remediation when needed.
5. Resolve conflicts and counsel colleagues, students and subordinates in a non-threatening, constructive and private manner.
6. Teach, conduct research, and care for patients with competence, honesty, and high ethical standards, embracing *cura personalis* (care of the person) in patient-centered interactions.
7. Support a learning culture that seeks continuous improvement to ensure accountability for individual and organizational behaviors and outcomes consistent with the Just Culture framework adopted by the School of Medicine. A key component to the framework is maintaining a professional culture of equity and justice through professional development and reduction of risk.
8. Understand and follow the University and the School policies and procedures applicable to their work and require those reporting to them to do the same.
9. Perform University and School activities in compliance with applicable laws, regulations and institutional policies. Examples include, but are not limited to, Stark Law, Anti-Kickback Law, Antitrust Laws, False Claims Act, Coding and Billing Rules, Documentation Standards, and HIPAA.
10. Report suspected fraud, waste, abuse, and violations of laws, regulations, institutional policies, and procedures, including this Code, to the appropriate office of the University, and do not retaliate against those who do.
11. Respect the personal, confidential, sensitive or legally protected information of all individuals (students, employees, alumni, donors, patients, research subjects, research sponsors, contractors, and others) of Saint Louis University and educational, research, and clinical affiliates. Careful treatment of such information includes observing applicable laws, policies, and procedures for obtaining, securing, maintaining, handling, divulging, and destroying information, as well as limiting its use to the purpose for which access was granted.
12. Maintain all licenses and certifications required for their positions, participate in education and training as necessary to maintain professional competence, and be fit for duty during work time, including on-call responsibilities.
13. Use facilities, equipment, supplies, and resources, including telecommunications and information technology resources, of the University and the School responsibly and for

- legitimate business consistent with policy and legal requirements, including tax-exempt status.
14. Record, allocate, and document patient encounters, revenue, expenditures, time, effort, and other information in a way that is accurate, clear, complete, and timely.
  15. Protect the University and the School's name and intellectual property from improper use.
  16. Observe regulations, standards, policies, and adhere to sound practices relating to matters of health and safety, including laboratory and workplace safety, the handling and disposal of hazardous materials, and the operation of facilities, vehicles, and equipment of the University.
  17. Protect the privacy and security of personal health information, personal health identifiers, and other private or sensitive information.
  18. Disclose to the University any clinical, managerial, personal or financial relationships that could appear to bias decisions made on behalf of the University and School.
  19. Maintain appropriate use of social media.

#### 4.2 Restrictions

Faculty and staff must refrain from:

1. Behavior that is disruptive or disrespectful of others and unprofessional interpersonal behavior that interferes with the working and learning environment (for example shouting, personal attacks or insults, condescending or abusive language, throwing objects or other displays of temper).
2. Providing care contingent upon personal business or relationships with patients, students, research subjects, or their families.
3. Unauthorized use, possession, exchange, or purchase of illegal drugs, alcohol, and weapons.
4. Unwanted physical contact with others or threats of such contact.
5. Sexual harassment or harassment based on color, age, sex, race, ethnicity, national origin, religion, disability, military/veteran status, sexual orientation, or gender identity. If a faculty or staff member becomes involved in a romantic relationship with an individual who reports to her/him, s/he is expected to promptly disclose the relationship to her/his department director and to make an appropriate transfer of supervisory authority. If the department director is involved in a romantic relationship with an individual who reports to her/him, s/he must disclose the relationship to the Associate Dean for Faculty Affairs and/or to her/his Department Chairperson. Faculty and staff members are discouraged from pursuing romantic relationships with trainees, including students and residents.
6. Maintaining a supervisory role over a family member, including a domestic partner. If a faculty or staff member becomes the supervisor of a member of her/his immediate family, s/he is

expected to promptly disclose that fact to her/his Department Chairperson and to make an appropriate transfer of supervisory authority.

7. Accepting personal gifts without disclosure when the gift is directly or indirectly related to activity performed in one's capacity as a faculty or staff member.
8. Discrimination in violation of policies of the University based on color, age, sex, race, ethnicity, national origin, religion, disability, military/veteran status, sexual orientation, or gender identity.
9. Requesting individuals to perform duties beyond the scope of their professional responsibilities.
10. Misappropriating property of the University or of the School or excessive use of University or School resources for personal business.
11. Discriminate against or intimidate anyone who, in good faith, reports or participates in the investigation of an actual or suspected violation of University policy, including this Code.

#### 5.0 Procedure:

The School expects that all faculty and staff demonstrate their willingness to adhere to the elements of the Code by reviewing and signing an Attestation Statement annually. All Department Chairpersons will be responsible for requiring faculty and staff signatures (including Tenured Faculty) acknowledging receipt and understanding of the contents and expectations contained in the Code. The University will retain the Attestation Statements for a period no less than ten years.

#### 5.1 Newly Hired Faculty and Staff

Newly hired faculty and staff, including but not limited to, full time, part time, adjunct, and volunteers, will be expected to review and sign the Code of Professional Conduct Attestation Statement within sixty days of employment/contract date.

#### 5.2 Returning Faculty and Staff

As part of the contract renewal process, all returning faculty will be expected to review and sign the Code of Professional Conduct Attestation Statement each year and upon significant updates to the Code. Tracking of completion will be facilitated by the Compliance Office.

#### 5.3 Violations

Within the School of Medicine, violations of professional behavior as outlined by the Code of Professional Conduct will be reported to the Office of Professional Oversight. Upon receipt of the report, the matter will be triaged to the Office of Faculty Affairs and Development, if deemed appropriate.

Within the Center of Advanced Dental Education, violations of professional behavior will be reported to the Center Director.

Reports will remain confidential unless imminent harm is suspected, there exists a suspicion of HIPAA violations, or there are breaches of federal regulations pertinent to fraud, waste, and abuse laws. All matters and subsequent follow-up will align with outlined policies and procedures in the 2017 Saint Louis University Faculty Manual.

#### 6.0 Sanctions:

Individuals who fail to comply with this policy and the procedures associated with it will be subject to disciplinary actions guided by the University's Faculty Manual and Human Resource policies. Noncompliance with this policy can result in disciplinary action, including but not limited to, restricted incentive payments, suspension, or termination. It may also result in the enforcement of a corrective action plan, as well as notification of the suspected misconduct and/or violation to government regulatory agencies.

Disciplinary actions appropriate to the severity of the infraction will be carried out as needed.

#### 7.0 Compliance Resources:

The University's Vice President of Compliance and Ethics remains available as a resource to the University and School community in support of this Code. Additional resources include:

- School of Medicine Office of Faculty Affairs (314) 977-8634
- School of Medicine Office of Professional Oversight (314) 577-8933
- Healthcare Compliance Office (314) 977-5545
- Compliance Hotline (877) 525-5669

#### 8.0 Changes to this Code of Conduct:

Changes to this Code may be necessary from time to time. At a minimum, this Code will be reviewed on an annual basis or as necessary.

#### 9.0 Protection Against Retaliation

At no time shall a person, who in good faith reports a violation of this Code, be retaliated against for that reporting. Any individual who retaliates against or intimidates another individual for reporting known or suspected improper activity shall be subject to appropriate disciplinary proceedings as set forth in the faculty, student, and staff handbooks.

#### 10.0 Code of Professional Conduct Attestation Statement

I have read and understand the content, requirements, and expectations of the Code of Professional Conduct for Faculty and Staff at Saint Louis University Medical Center. I have received a copy of the Code, and agree to abide by the guidelines as a condition of my employment at Saint Louis University. I understand that if I have questions, at any time, regarding the Code of Professional Conduct, I will consult with my immediate supervisor or appropriate Medical Center administrator.