Dear Members of the Baylor College of Medicine Community,

Baylor College of Medicine is an organization with a legacy of excellence created by faculty, staff and trainees beginning in 1900 when the College was founded. The creativity, innovation and high standards of each person here have made us a leader in academic medicine, the Houston community and our global community.

This year we are focusing on using our institutional values of respect, integrity, innovation, teamwork and excellence to guide all of our decisions and actions. These values will be integrated throughout our missions and our programs. In alignment with our mission, vision and values, we are also introducing a Code of Conduct for our organization.

The Code of Conduct defines our long-standing commitment to integrity and defines the professional and ethical ways in which we work with one another. The Code of Conduct also includes our expectations for ethical behavior, respect, work within teams and the day-to-day conduct of each person at Baylor College of Medicine.

Education, biomedical research and healthcare are all heavily regulated, and it is essential that we are in compliance with Baylor’s policies and procedures as well as with government and industry regulations. Our Code of Conduct is meant to enhance our compliance and instill in each person at Baylor the responsibility for working with integrity each and every day.

Please take time to carefully review the Code of Conduct and contact our Compliance Office at 713.798.4366 if you have any questions.

Thank you for all that you do to make Baylor College of Medicine an exceptional health sciences center.
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Our Mission
Baylor College of Medicine is a health sciences university that creates knowledge and applies science and discoveries to further education, healthcare and community service locally and globally.

Our Vision
Improving health through science, scholarship and innovation
- Discover the fundamentals of human disease and health
- Invest in the human and technological resources necessary for innovation
- Reach the community locally, nationally and globally
- Educate generations of lifelong learners dedicated to excellence in biomedical research, patient care and education
- Create the learning health delivery system of the future
- Translate our discoveries into new diagnostics, treatments and cures
- Sustain an operationally excellent and fiscally stable platform

Our Values
RESPECT
- We promote and support diversity, inclusion and equity
- We value our colleagues and ourselves as the College’s most valuable assets
- We earn the loyalty of those we serve through our commitment

INTEGRITY
- Honesty, ethics and openness guide our interactions
- We encourage transparent analysis of our policies, process, procedures and decisions
- We are accountable for our actions

INNOVATION
- We lead through visionary innovation and creativity
- We foster a healthy culture of change
- We turn vision into action

TEAMWORK
- We form mutually beneficial partnerships to achieve results
- We look past ourselves to focus on the impact of our actions
- We recognize all who contribute to our work

EXCELLENCE
- We focus on quality and value
- We commit to continuous quality improvement for outstanding outcomes
- We are effective and efficient
Every member of the BCM community shares in the responsibility for sustaining the highest ethical standards in alignment with BCM’s Mission, Vision and Values. We are individually and collectively accountable for our conduct and compliance with laws, regulations and BCM policies.

The BCM Code of Conduct is our comprehensive framework for ethical and professional standards. It is designed to ensure that we, all members of the BCM community, understand the expectations to conduct ourselves in an ethical and professional manner while complying with all laws, regulations, rules and policies to the fullest degree.
The Code of Conduct highlights core principles essential to maintaining a fair and responsible environment, contributing to an atmosphere in which the academic, research, clinical and business goals of the organization can be met effectively. The BCM Code of Conduct applies to the following individuals:

- Employees (faculty, staff, administration)
- Students (including residents and postdoctoral trainees)
- Members of the BCM Board of Trustees
- Vendors while doing business with BCM
- Contract/non-permanent workers
- Visiting healthcare practitioners

CORE CODE OF CONDUCT PRINCIPLES

Our Code of Conduct is a resource for all of us as we endeavor to achieve our mission. By understanding and abiding by these core principles within this framework, we demonstrate our commitment to BCM’s core values. BCM employees, faculty, staff, students and others working at BCM are committed to the following Code of Conduct principles:

- We comply with laws and regulations
- We follow our academic standards
- We adhere to ethical and leading social media practices and policies
- We comply with research standards
- We abide by our policy concerning disclosure of outside interests
- We document, bill and develop our financial reports accurately
- We follow workplace health and environmental standards
- We protect the confidential information of our patients, co-workers and BCM
- We adhere to patient rights and responsibilities
- We protect our intellectual property, proprietary information and assets
- We follow human resources policies and guidelines
- We adhere to our non-retaliation policy
The BCM Code of Conduct should be used as a reference guide and key resource for executing BCM’s daily functions and processes. At a minimum, this means acting ethically and professionally, obeying the law and avoiding improper activities. This reference guide includes examples of how the Code of Conduct applies to daily work. Our Code of Conduct is one of the many tools that can help us work in a responsible, professional and ethical manner. By understanding and using this reference guide, we demonstrate our commitment to our core values.

The Code of Conduct encompasses important BCM policies and serves as a tool that outlines topics and guiding principles that apply to everything we do. The Code of Conduct is designed to provide a practical means for conducting day-to-day business operations based on BCM’s values.

The Code of Conduct further provides expectations for compliance with BCM policies and procedures maintained on BCM’s Intranet site. Some of these policies or practices are included herein and must be read, understood and followed.

The comprehensive BCM Policy and Procedures Manual can be accessed via the intranet link “BCM Policy and Procedures Manual.” Should additional questions arise concerning the Code of Conduct, please seek guidance from your departmental management or contact the Compliance Department.

Adherence to the Code of Conduct principles is a responsibility for each of us in the BCM community, and we are each accountable for reporting non-compliant issues or suspected offenses.
The purpose of the BCM Compliance Program is to promote a working and learning environment which reflects BCM's commitment to maintaining the highest level of integrity, ethical standards and core values for all members of the BCM community. Compliance requires adherence with BCM policies and procedures, laws, regulations, and guidelines for which the BCM community is expected to abide by during day-to-day operations and in support of excellence in education, research and patient care.

The BCM Compliance Program was created on foundational elements as recommended by the Office of Inspector General (OIG) of the U.S. Department of Health and Human Services and based on the U.S. Sentencing Commission Guidelines for program effectiveness. As such, the BCM Compliance Program includes the following elements:

- Implementing written policies, procedures, and standards (code) of conduct
- The designation of a compliance officer and oversight compliance committee
- Conducting effective training and education
- Developing effective lines of communication
- Conducting internal monitoring and auditing
- Enforcing standards through well publicized disciplinary guidelines
- Responding promptly to detected offensive and undertaking corrective action

The BCM compliance team is committed to supporting the BCM community by communicating compliance requirements and expected conduct. The BCM Code of Conduct is a published guide and a foundation of principles for each of us to commit to and follow. Periodic compliance education and training will be conducted by BCM’s compliance department to promote compliance awareness and communicate BCM policies, procedures and expected conduct.

Questions about specific compliance or ethical issues should be directed to the department and these individuals:

**Chief Compliance Officer**
compliance@bcm.edu  
713.798.4389

**Privacy Officer**
privacycompliance@bcm.edu  
713.798.5637

**Compliance Director**
compliance@bcm.edu  
713.798.2016

**Information Security Officer**
privacycompliance@bcm.edu  
713.798.7618

**The BCM Compliance Department is located at:**

Compliance and Audit Services  
2450 Holcomb Blvd, NABS OW202  
Houston, Texas 77021  
Office Number: 713.798.4389
We are all responsible for making sure that BCM conducts its business and academic programs with honesty and integrity and provides a learning environment that respects students’ rights, treats them fairly and supports their academic success. To help, we should report all instances of unprofessionalism and possible violations of law, regulations and policy. The BCM Compliance Program provides several ways to report these violations without fear of retaliation. Find more information on the BCM non-retaliation whistleblower policy linked on page 23.

Compliance and adherence to the Code of Conduct principles is a responsibility of each of us in the BCM community and we are each accountable for reporting non-compliant issues or suspected offenses.

**What is a reportable compliance concern?**

Examples of violations include unethical conduct, illegal or fraudulent activity, financial misstatements or irregularities, conflicts of interest and violations of laws, regulations or policies. For questions regarding whether an action is reportable, please contact the BCM Compliance Department at 713.798.4366.

**How can I report a compliance concern?**

If you believe there is a possible policy or regulatory violation, or you have an ethical or compliance concern, reporting may be accomplished by:

1. Contacting your departmental management through your normal chain-of-command, human resources, legal or the Compliance Department.
2. Using the BCM Integrity Hotline by calling the toll-free number, 1.855.764.7292.

Integrity Hotline callers may remain anonymous when reporting an issue. After completing a report, the caller will be assigned a unique code called a “report key.” After 5-6 business days, the report key and password may be used to check the status of the report for feedback or questions.

When a call to the BCM Integrity Hotline is initiated, the caller will speak with an individual who will take a report and forward the information to the BCM Compliance Department for the appropriate follow up. The Integrity Hotline’s number is toll-free within the United States, Guam, Puerto Rico and Canada.

Reports may be filed electronically at www.bcm.ethicspoint.com by selecting the “Make a Report” link at the top left corner of the web page and entering comments and/or concerns as applicable.
BCM operates in accordance with all State and Federal laws and regulations and in a manner that is reflective of high ethical values, which promote the strictest compliance with these standards. To achieve this, we must:

- **Identify and understand all laws and regulations** that relate to each individual BCM role and its responsibilities and ask questions to promote maximum comprehension.

- **Conform to all applicable laws, regulations, standards** and other compliance requirements at all levels within BCM.

- **Comply with the Anti-Kickback Statute**, which prohibits individuals and entities from knowingly offering, paying, soliciting or receiving remuneration (kickbacks) to induce referrals of items or services paid for by a federally funded program (i.e., Medicare and Medicaid).

- **Adhere to the False Claims Act**, which imposes civil liability on any person who knowingly submits, or causes to be submitted, a false or fraudulent claim.

- **Implement all standards and requirements** of the Health Insurance Portability and Accountability Act (HIPAA) and the Health Information Technology for Economic and Clinical Health Act (HITECH).

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**Frequently Asked Questions:**

What are kickbacks?

*Kickbacks are gifts, gratuities, payment or services given with the intent to influence or gain something, which can include referrals from a company or person.*

What is the False Claims Act?

*A Federal law that imposes liability on persons and companies who defraud governmental programs and is the federal government’s primary tool in combating fraud against the government.*

What should I do if I inadvertently submit a claim with incorrect (false) information on it?

*Report this incident to your supervisor and/or the Compliance Department immediately.*
More than any other factor, the commitment, experience and quality of our faculty along with their ethical behavior and role modeling influence the success of our students and the College. The BCM faculty is guided by a deep conviction of the worth and dignity of the advancement of scientific knowledge and discovery and devotes its energies to developing and improving scholarly competence and guiding students in achieving their full potential. The faculty demonstrates an authentic commitment to diversity and inclusion and to providing a learning environment that supports excellent student learning outcomes that prepare students and trainees to deliver safe, equitable, efficient and effective patient care. We should:

- **Encourage** the free pursuit of student learning.
- Foster **honest** academic conduct.
- **Assure** student evaluations that reflect each student’s true merit.
- **Respect** the confidential nature of the relationship between the professor and student.
- Obey the canons of **intellectual honesty** in research and authorship.

**Frequently Asked Questions:**

What should I do if I observe unprofessional behavior in a faculty or staff member?

*You should report this concern to your supervisor or administrator immediately. If you are uncomfortable reporting through your regular chain of command, you may also call the Integrity Hotline or the Compliance Office.*

Can I report anonymously?

*Yes, any concerns can be reported to the Integrity Hotline either by phone at 855.764.7292 or online at [www.bcm.ethicspoint.com](http://www.bcm.ethicspoint.com).*

What can I do if a patient treats me with disrespect?

*You may also report this concern to your supervisor, administrator or department leadership for appropriate action and follow-up.*
In accordance with the Baylor College of Medicine (BCM) Compact between Teachers, Learners and Educational Staff, students pursuing a professional career at BCM assume responsibility to develop in-depth knowledge, acquire and apply special skills, uphold academic honesty standards and demonstrate professionalism. To support this, we should:

- **Acquire** the knowledge, skills, attitudes and behaviors necessary to fulfill all established educational objectives.

- **Embody** the professional virtues of integrity, empathy, altruism, compassion, respect, honesty, courage and trustworthiness.

- **Respect** as individuals, without regard to gender, race, national origin, religion or sexual orientation, all patients, peers, faculty and staff.

- **Uphold** the highest professional standards and conduct ourselves accordingly in all interactions with patients, peers, faculty and staff.

- **Assist** our fellow learners in meeting their professional obligations while fulfilling our own obligations as a professional.

- **Create** a safe environment in which individuals can communicate any concern about breaches of this Compact.

**Frequently Asked Questions:**

What should I do if I observe unprofessional behavior in a student?

You should report this concern to a faculty member immediately. If you are uncomfortable doing so, you may also call the Integrity Hotline or the Compliance Office.

Can I report anonymously?

Yes, any concerns can be reported to the Integrity Hotline either by phone at 855-764-7292 or online at www bcm.ethicspoint.com.

What can I do if a fellow student treats me with disrespect?

You may also report this concern to a faculty member for appropriate action and follow-up.
The continuously evolving landscape of social media provides many opportunities to participate in interactive discussions and share information. While BCM supports the use of social media by its community members as a way to facilitate communication, social media can impact views and opinions of BCM, particularly with respect to academics, patient quality of care, and research. In order to optimize the social media network and foster a positive image, we should:

- **Be professional and respectful** at all times when using social media.
- **Use good ethical judgment when posting** and follow all College policies in addition to laws and regulations such as the Health Insurance Portability and Accountability Act (HIPAA) and the Family Educational Rights and Privacy Act (FERPA). 02.5.38 Social Media Policy
- **Understand** that social media content can live forever.
- **Seek leadership approval** prior to posting any content involving patient care and/or research, including but not limited to pictures, status and new advancements.
- **Never engage language** that is illegal, threatening, profane, harassing or hateful.
- **Follow organizational guidelines** and policies when using BCM trademarks and logos and seek approval prior to posting.
- **Maintain patient confidentiality** when using social media.

**Frequently Asked Questions:**

What is considered social media?

*Social Media is any form of websites or applications that allows for interactive communication where users can create and share content or participate in social networking.* Examples of social media include but are not limited to, Facebook, Twitter, LinkedIn, Google+, Instagram, Flickr, Reddit and countless other platforms and applications.

Am I allowed to access these sites on my BCM PC?

*Access to computers, information systems and networks owned or operated by BCM imposes certain responsibilities and obligations on those granted such access. An individual user’s access must always be in furtherance of the user’s responsibilities, with common sense exceptions, such as during breaks and before or after working hours within the provisions of the BCM Acceptable Use Policy.* Personal use of BCM equipment for Internet usage during breaks and before or after working hours is to be confined to those allowed legal websites that will not cause potential liability to BCM. If you are unsure about a particular site, please ask your supervisor.
Home to one of the nation’s largest biomedical research programs, BCM has a proven track record of success. Our patients have access to the latest advances in medicine thanks to close collaborations with leading scientists. We will:

- **Abide by all guidance, regulations and institutional policies** involving human subjects 20.3.01 - Research: Human Research, animal subjects 20.4.1 Animal Research, and recombinant and synthetic nucleic acid molecules research. 20.5.01 Environmental Safety

- **Adhere to the highest standards for research financial stewardship** to ensure continued public support and trust. 20.2.00 - Research: Sponsored Programs

- **Conduct research activities** with integrity, respect and thoughtfulness at all times.

- **Timely complete all required** clinical and basic research training and education as required by our individual research roles.

- **Promptly report** any suspected occurrences of research misconduct, such as falsification of data or research results or non-compliance concerns. 20.9.01 - Research: Misconduct In Research

- **Disclose** any financial or other relationships that may result in a financial conflict of interest. Financial Conflict Of Interest in Research (FCOI-R)

**Frequently Asked Questions:**

What is the Institutional Review Board?

The Institutional Review Board, or “IRB,” is a committee that ensures research protocols involving human subjects are conducted ethically with the rights and safety of study participants fully protected. BCM has six IRB committees comprised of physicians, researchers and community members. All human subject research protocols conducted by BCM faculty must be approved by the IRB before they begin. For help or questions, please contact irb@bcm.edu.

What is the Institutional Animal Care and Use Committee?

The Institutional Animal Care and Use Committee, or “IACUC,” is a committee that reviews research protocols using animals, provides guidance on animal use, provides oversight of the animal care program and ensures compliance with applicable laws, regulations and policies. BCM researchers must submit all proposed research projects through the IACUC for review and approval. For help or questions, contact iacuc@bcm.edu.

What is the Institutional Biosafety Committee?

The Institutional Biosafety Committee or, “IBC,” is a committee comprised of researchers, safety professionals and community members who assure that research with recombinant and synthetic nucleic acids molecules is performed safely and reduces exposure of personnel and the environment. This committee operates under NIH Guidelines. For help or questions, contact ibc@bcm.edu.

How does BCM monitor ongoing research?

Research Compliance Services conducts routine monitoring as well as assessments related to concerns involving research compliance. Structured procedures are in place to handle concerns from faculty, staff, research personnel, research participants, family members or members of the community. The identity of complainants and information associated with assessments is kept confidential to the extent possible and retaliation against any employee for reporting or pursuing a complaint is strictly prohibited.
BCM recognizes the importance of its workforce to engage in a wide variety of activities both inside and outside of BCM. Engaging in relationships and/or partnerships is essential for advancing scientific and academic endeavors that benefit the College and the public; however, certain outside interests with entities and/or individuals should not compromise, or appear to compromise, the integrity of BCM’s primary mission. As such, it is essential to:

- **Ensure all outside activities be conducted free from any conflict of interest** or the appearance of a conflict.
- **Strive to avoid any apparent or actual conflict of interest** and respond appropriately when conflicts arise.
- **Disclose any outside financial interests or employment** that we have, which could impact duties at BCM in accordance with the pre-approval clause for industry-sponsored activities. Disclosure of Outside Interests Policy.

**Frequently Asked Questions:**

What is a conflict of outside interest?

A conflict of outside interest may include activities or personal financial interests or investments that may directly impact an individual’s judgment, decisions or actions related to the operations of BCM.

BCM is looking for a consultant to assist with a project, and my cousin owns a healthcare consulting firm. Is it appropriate to recommend his company?

Yes, you may recommend his company, but you must disclose the relationship and remove yourself from the decision-making process. Also, you may not share any proprietary information with your cousin that other potential consultants would not have.

I have been asked to serve on a scientific advisory board outside of BCM to review research. Am I able to serve?

Maybe. Serving on a scientific advisory board must be pre-approved prior to accepting the position.
BCM is committed to honesty, accuracy and integrity in all of our billing, medical coding and documentation practices. We have a duty to report any actual or perceived false, fraudulent or inaccurate claims for payment or documentation to management and/or the Compliance Department and to:

- **Timely submit for payment** or reimbursement claims only for services actually rendered and fully documented in patients’ medical records and use billing codes that accurately and appropriately describe the services that were rendered. 10.1.04 Authority and Responsibility of the Office of Billing Compliance

- **Capture and report patient information accurately**, honestly, completely and properly, in accordance with all applicable laws, regulations and policies.

- **Retain billing and medical record data** securely and confidentially and as required by law, regulations and policies.

- Fully comply with the Fraud, Waste and Abuse policy and complete required training within the designated timeframes.

- Report any suspected Fraud, Waste and Abuse violations or billing, coding and documentation inaccuracies immediately to management.

- Submit only accurate reports to governmental authorities and not make false or deceptive statements.

**Frequently Asked Questions:**

If documentation is incomplete or unavailable when we are ready to submit a claim or bill, can it be submitted?

*No. We should never submit a bill or claim based on incomplete, inaccurate or missing information.*

I work at the front desk of a BCM clinic, and my neighbor comes in for a scheduled appointment. She asks if I could get her a discount when I ask for her co-payment. Am I able to do this?

*No. Regulations and policies explicitly prohibit waiving or discounting co-pays or deductibles unless specific indigent requirements exist and are documented and processed according to BCM policies.*

What should I do if I suspect or discover Fraud, Waste or Abuse?

*You should report the concern immediately to the BCM Compliance Department and through your normal chain of command. You may also report the issue via the Integrity Hotline.*
BCM maintains a caring and healthy workplace for all faculty, staff and students. We are dedicated to treating each other with respect, dignity and courtesy. We are committed to providing a safe and secure environment for patients, faculty, staff and students. This is only accomplished through our responsibility to:

- **Treat all BCM faculty, staff, students and patients in a fair and respectful manner**, recognizing the diversity of our workforce and the individuality of each employee. 02.5.39 Employee Conduct at Work; 02.2.10 Affirmative Action; 02.2.40 Diversity

- Show proper consideration and respect to one another, understanding that **all forms of bullying, harassment and discrimination** on the basis of race, ethnicity, gender, disability, religion and sexual orientation are strictly prohibited. 02.2.25 Harassment

- **Abide by all laws, regulations and BCM policies** that support and promote a safe and effective work environment and **complete all required related training** within specified timeframes. 02.5.72 Workplace Violence; 02.5.38 Social Media

- **Encourage and support each other’s** individual skills, talents, knowledge and understanding of our jobs in order to deliver the highest quality of service.

- **Report to the appropriate supervisor** any practice or condition that may violate any health or safety law, rule or regulation. 02.5.61 Reporting Safety Concerns in the Workplace

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**Frequently Asked Questions:**

I received an email from another BCM employee that contained sexually related jokes and subject matter. Is this allowed?

*Emails that contain inappropriate, offensive content of a sexual nature are considered harassment and are explicitly against BCM policy. This should be reported to your supervisor and/or Human Resources immediately. If you are uncomfortable reporting this to your supervisor or Human Resources, you may report the issue by calling the Integrity Hotline or the Compliance Office.*

I have been relentlessly teased and made to feel less than adequate and degraded by a colleague because of my level of education or work performance. Is this allowed?

*Forms of abusive behavior or bullying are not to be tolerated. This should be reported to your supervisor or Human Resources immediately.*
Compliance with laws, regulations and policies concerning protecting the confidentiality, privacy and security of our patients, research subjects and our workforce’s medical, financial and personal information is expected. Strict compliance with BCM confidentiality, privacy and security guidelines and policies is required and:

- **Only access** confidential, financial or protected health information when required to complete our designated responsibilities and for no other reason. [HIPAA policies](#)

- Passcodes must be kept secret and secure at all times. [IT Security Password Policy](#)

- Procedural steps concerning the use and disclosure of Social Security numbers must be followed.

- Confidential and Protected Health Information (PHI) must be properly stored and safeguarded.

- Patient records may only be released with proper authorization and in accordance with policies and procedures.

### Frequently Asked Questions:

A professional athlete from my favorite team is receiving treatment from BCM. I am not on the treatment team, but I am curious about his condition. I have access to his record in Epic. Can I log on to review his condition?

No. BCM privacy employs the HIPAA minimally necessary standard, which means you can only access and use PHI that is reasonably necessary to do your job.

While reviewing patient documentation, I notice that my neighbor is undergoing a serious procedure for a heart defect. I am very concerned and would like to reach out to her to express my sentiments. Can I send her a note?

No. You must respect the privacy of your neighbor and maintain confidentiality. While the information was uncovered while completing your appropriate job functions, it would be a violation of BCM Privacy and Security to disclose this information without permission.

How do I report a breach of confidentiality, privacy or security?

*You must report the breach to the BCM Compliance Department and through your normal chain of command. All breaches must be reported to the Compliance Department.*
Patients are at the heart of everything we do at BCM. To us, that means offering cutting-edge diagnoses and treatments in a compassionate manner that respects our patients. To maintain this culture of excellence, we must commit to protecting patients’ rights, strive to provide high quality of care and:

- **Strictly adhere** to all laws, regulations and policies relating to patient care and clinical operations including patient rights as defined by HIPAA.

- **Treat patients with respect** and consideration without discrimination at all times. [BCM Patient Bill of Rights; BCM Patient Responsibilities](#)

- **Provide medical services and products to patients that are safe** for the intended use and comply with all applicable laws, regulations and professional standards. [Baylor Clinic Policies](#)

- **Deliver services in an effective and efficient** manner while reducing costs with a value-based approach in all healthcare areas.

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**Frequently Asked Questions:**

If I witness a patient being treated unfairly or in a disrespectful manner, what should I do?

*Report the event to your department management (through the chain of command) immediately, so they may assist in resolving the situation. If management is unavailable or inaccessible, you may also contact the Compliance Department at 713.798.4366 or Integrity Hotline by calling the toll-free number 855.764.7292.*
BCM proprietary property is defined as property that signifies a relationship to BCM or any property issued to individuals to enable them to conduct their business that was procured by BCM (i.e., BCM identifications, keys and access control cards, research information and materials, manuals, equipment, computers and computer storage devices, etc.). At BCM, we comply with all applicable intellectual property laws. We respect these laws as they apply to publications, media and other forms of expression and communication. BCM’s intellectual property rights are valuable business assets, and as such, it is necessary to:

- **Protect BCM’s intellectual and property rights** while employed and after the termination of our employment.
- **Safeguard intellectual and proprietary properties** in an appropriate and accountable manner.
- **Notify management** or the Compliance Department of any suspected infringement of intellectual property.
- **Respect the intellectual property rights of others** and do not knowingly infringe on any valid third party rights.
- **Only use software that has been properly licensed** and use it in conformity with the terms of the license. 13.5.07 Proprietary Property Control

**Frequently Asked Questions:**

I am an assistant professor and would like to use a published journal as a case study in my course. I know that the content is copyrighted. Am I able to use this content?

In most circumstances, protected materials may not be used or copied without explicit written permission. However, some exceptions may apply under the Fair Use Doctrine for copyrighted materials. The Fair Use Doctrine allows limited use of copyrighted material without getting permission from the copyright holder. Examples of fair use may include commentary, criticism, news reporting, research and teaching. As a general rule, if you are unsure whether something is protected by copyright, trademark or a license or whether it is appropriate to use or copy it, it is best to ask your supervisor.
BCM is dedicated to protecting our assets, including our financial resources, BCM systems (e.g., network and email system), BCM domains for electronic communication forums (e.g., Intranet), BCM equipment and supplies. We do so by making prudent and ethical decisions to ensure that our assets are only used to support our mission. We can accomplish this by protecting BCM resources from loss, damage, theft, misuse and waste in the same manner as we would protect our personal resources. As such, it is important to:

- **Use assets and resources for College purposes only in accordance with relevant policies and procedures and be accountable to ourselves and others.**
- **Dispose of surplus, obsolete or junked property in accordance with regulations and policies.**
- **Ensure drugs, hazardous materials, hazardous waste and other sensitive material are maintained, stored and disposed of in accordance with all laws, regulations and policies.**
- **Report any misuse of assets immediately,** such as unauthorized disposal or removal of BCM property.

**Frequently Asked Questions:**

What should I do if I see someone removing property from the BCM premises who is not wearing a BCM issued badge or identification?

*Do not approach the person but rather try to obtain a description of the person and a vehicle color, make, model and license plate number. Then report this information to BCM security.*

What should I do if I see someone inappropriately disposing of hazardous materials or hazardous waste?

*Immediately report this information to BCM security and management.*
BCM is committed to creating a caring, safe and healthy environment that protects and supports all employees and workforce members. BCM seeks to cultivate a setting that enables all to achieve their fullest potential in a fair and equitable manner. To accomplish this, we commit to:

- Treat all people with **respect, dignity and courtesy**.
- **Show proper consideration for one another**. Discriminatory treatment, sexual harassment and unlawful harassment of any kind is strictly prohibited.
- Observe the standards of our professions and **exercise good judgment and objectivity** in our practices.
- **Take** all reasonable **precautions** to **ensure our safety** as well as the safety of patients, visitors, students and other personnel.
- **Maintain a drug-free and smoke-free workplace**.
- **Use our time productively** during work hours.
- **Strive to be fair and consistent** in our treatment of team members.

### Frequently Asked Questions:

**I have noticed my supervisor using his Baylor credit card on personal purchases. I am uncomfortable approaching him directly. What should I do?**

You may contact Human Resources or the Compliance Department directly, or you may also report the concern anonymously via the Integrity Hotline by phone at 855.764.7292 or online at www.bcm.ethicspoint.com.

**I witnessed an employee taking what appeared to be illegal drugs on campus. What should I do?**

Report this incident to your supervisor or Human Resources immediately. If you are uncomfortable reporting this to your supervisor or Human Resources, you may report the issue by calling the Integrity Hotline or the Compliance Office.
BCM supports a culture of integrity that encourages all of us to communicate compliance concerns or suspected violations of law, regulation or policy. Everyone who works at BCM has a responsibility to, in good faith, report any known or suspected violation of BCM policy or applicable law or regulation. Anyone who honestly and in good faith reports suspected wrongdoing will be protected from retaliation. BCM employees are protected by Federal and Texas State law from retaliation for reporting a violation, and BCM may not suspend, terminate or threaten any employee for reporting a violation. In order to achieve the highest level of ethical standards, we must:

- Remember in our daily roles and responsibilities that **compliance is everyone’s responsibility**.
- Fully and timely **participate in required Compliance Program trainings** and education.
- **Report any known or suspected violations** of BCM policy or applicable law or regulation. 02.10.10

**Whistleblower Policy**

**Frequently Asked Questions:**

What is considered retaliation?

*Retaliation is any action that adversely affects the employment or other institutional status of an individual (including discharging, demoting, suspending, threatening, harassing, or in any other manner discriminating against an employee in the terms and conditions of employment), that is taken by the institution because the individual has, in good faith, made an allegation concerning the violation of a law, rule, policy, or procedure, or of inadequate institutional response to such, or has cooperated in good faith with an investigation of such allegation.*

I have a direct report who has voiced a concern or submitted a complaint about work directly related to my position. What should I do?

*You should not take any action against this individual. BCM prohibits all unlawful retaliation against individuals as a consequence of good faith actions in reporting alleged improper activities or participating in an investigation of alleged improper activities. Any individual who retaliates against another individual as a result of reporting known or suspected improper activity is subject to appropriate disciplinary action, up to and including termination.*
I pledge to adhere to the highest ethical standards and promote a culture of integrity. All of my decisions and actions will be guided by the Baylor College of Medicine values and principles. I will use the Code of Conduct as a reference guide and key resource for executing my daily functions.

I acknowledge that I have received a copy of the Baylor College of Medicine Code of Conduct. I have fully read and understand the content.

________________________________________
(Print Name)

________________________________________
(Position)

I am a member of the Baylor College of Medicine community. I certify that I have received the Baylor College of Medicine’s Code of Conduct and will abide by its provisions.

________________________________________
(Signature)

________________________________________
(Date)