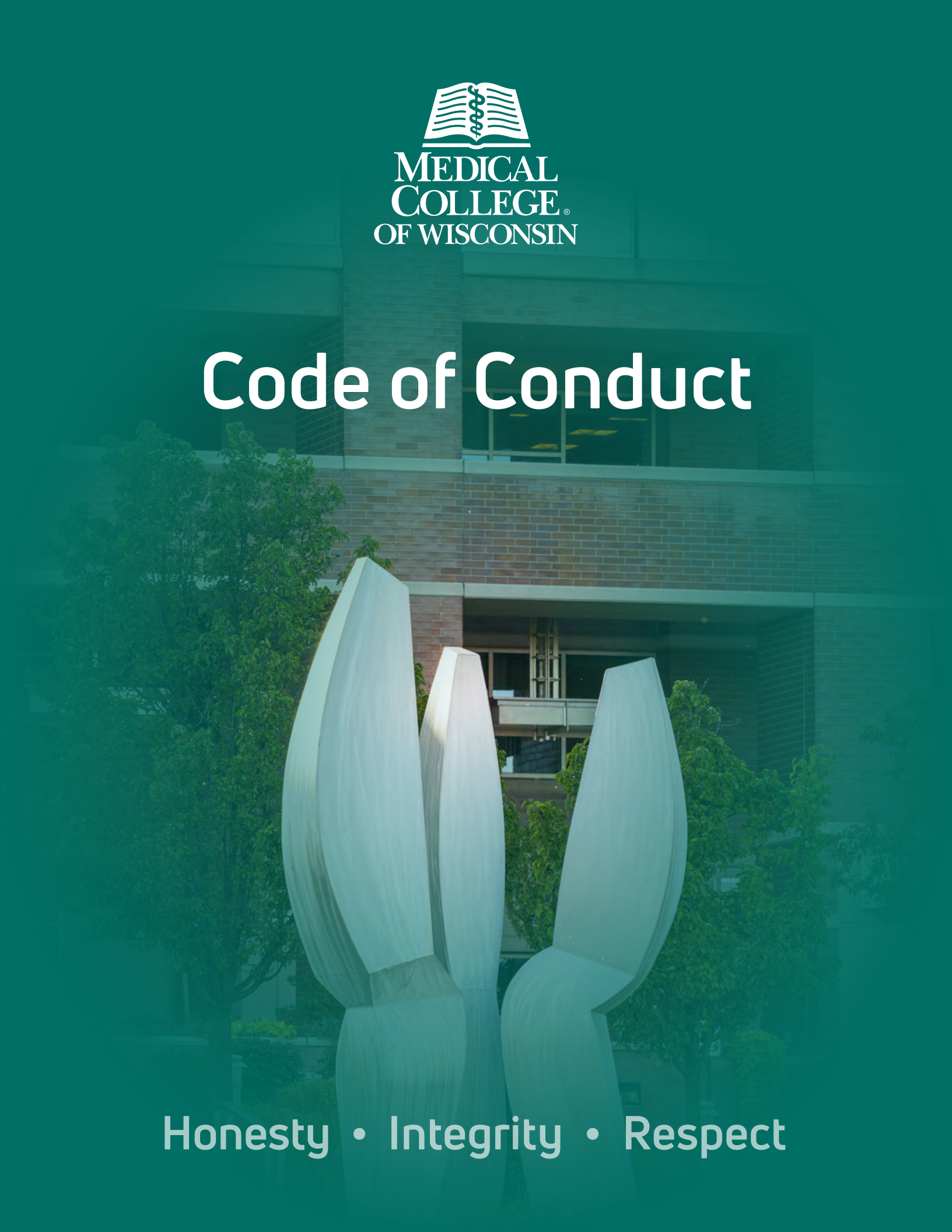
MEDICAL COLLEGE® OF WISCONSIN

Code of Conduct



Honesty • Integrity • Respect

MISSION

We are a distinguished leader and innovator in the education and development of the next generation of physicians, scientists, pharmacists and health professionals; we discover and translate new knowledge in the biomedical and health sciences; we provide cutting-edge, collaborative patient care of the highest quality; and we improve the health of the communities we serve.

PURPOSE

This Code of Conduct (Code) supplements MCW's mission and is a foundation for ensuring that we conduct ourselves with integrity and respect and within appropriate ethical and legal standards in our daily activities. This Code includes five broad categories of principles:

1. Acting with Integrity and Respect
2. Excelling in our Missions
3. Safeguarding Our People, Resources and Information
4. Embracing Business Ethics
5. Interacting Appropriately with Third Parties

This Code applies to all MCW trustees, faculty, staff, trainees and students, collectively referred to as "we" throughout this document. Also, it is our expectation that those with whom we do business act and perform services in a manner that is consistent with this Code of Conduct.

The Code does not cover every situation. Instead, it provides broad guidelines that are detailed in laws, or MCW policies and procedures. Information is provided at the end of the Code on where to go with questions or to report concerns, as well as how to access our policies and procedures.

1 Acting with Integrity and Respect

Compliance with the Laws

MCW and its faculty, staff, trainees and students comply with all applicable laws, accreditation standards and policies. Here and throughout this Code, "Laws" include federal, state and local statutes, codes, rules, regulations, ordinances, orders, judgements and regulatory guidance documents.

Reporting Violations and Protections from Retaliation

We immediately report, in good faith, any known or suspected violations of this Code, ethics, applicable Laws, accreditation standards, policies or contracts. MCW has a non-retaliation and non-retribution policy. MCW does not retaliate against those who make good faith reports; rather, MCW encourages anyone to come forward with any concerns.

Commitment to Non-Discrimination and Equal Opportunities

MCW will not discriminate against its faculty, staff, trainees or students in how we select, hire or admit, evaluate, reward or determine dismissals, in accordance with and adherence to our Nepotism policy, and legally protected characteristics such as race, gender identity, sexual orientation, age, disability status or protected veteran status. MCW is committed to upholding all Laws and fostering an environment free from all forms of discrimination and harassment.

Professionalism

MCW recognizes that professional conduct from all members of its community is essential to advancing our missions of patient care, research, education and community engagement. We demonstrate professionalism by acting with integrity and respect, striving for excellence in all we do and practicing magnanimity in our collaboration with one another and with the communities we serve. These behaviors embody who we are as faculty, staff, trainees and students, and pervade all that we do at MCW.

Inclusion

At MCW, we believe that seeking and embracing diversity of people and perspectives is key to our engagement, growth and success. We value the unique backgrounds, identities and talents of each member of our community. As such, we will provide an environment that honors the dignity of all who study, train and work at MCW as follows:

- We listen to all voices with openness to multiple and diverse points of view
- We resolve conflicts with a spirit of civility
- We strive to be aware of our biases and to respond with curiosity and positive engagement with others
- We support the development and advancement of members of the MCW community.

2 Excelling in our Missions

Excellence in Teaching and Education

Excellence in basic, biomedical and health sciences education and training is a core mission of MCW. We pride ourselves on providing cutting-edge educational and training opportunities for all those involved in research and health care delivery - from beginning health care students to those well-established in their careers. Civically minded, we are also committed to educating our patients and the community at large. We recognize our role as a higher education anchor. Through education, we seek to be a transformative force in our community, in our country and in our world.

Quality of Care and Patients' Rights

MCW is committed to upholding the dignity of all of our patients, including the most vulnerable, and providing high-quality, transparent and compassionate care. We respect the rights of our patients and/or their surrogates (as appropriate) to actively engage in decision-making, including the right to refuse care, and recognize our duty to facilitate collaborative decision-making.

Innovation and Excellence in Research

MCW is committed to fostering innovation and excellence in all biomedical research we conduct. We adhere to the belief that research should be conducted and the results of research disseminated in accordance with the highest professional standards, including intellectual honesty, accurate reporting of methods and results, appropriate acknowledgement of the contributions of others, and maintenance of confidentiality. We follow all Laws and MCW policies in the conduct of research. We are committed to following ethical standards in all research activities.

Commitment to the Community

Community engagement is a core mission of MCW. We seek to be a vital partner in creating healthy, thriving communities as we find innovative ways to promote the health and well-being of people throughout Wisconsin. We strive to reaffirm the trust of our patients, collaborate with colleagues outside our institution, and forge authentic partnerships within our community.

3 Safeguarding our People, Resources and Information

Safe Work Environment

MCW is committed to providing a safe workplace and learning environment. We work to promote a culture that is caring, healthy and respectful of others. MCW does not tolerate harassment of any kind, or threats or acts of violence within any location in which we operate.

Protection and Use of Resources

We invest, safeguard and use our resources to further our missions. We strive to exhibit fiscal stewardship through the prudent use of resources, including financial assets, physical property, intellectual property and employee effort. We protect our resources against loss, theft, misuse, damage or destruction.

Security and Use of Technology

MCW protects its technology resources and information with a blend of modern policies and procedures and industry-leading security solutions. Faculty, staff, trainees, students and all individuals authorized to access these resources must conduct themselves in a responsible, ethical and legal manner. The use of MCW's technology resources is aligned with and serves our institutional missions.

Recordkeeping

We store records in a safe and secure manner. We retain records for an appropriate period of time, in accordance with applicable Laws and our record retention policies. We never falsify, misrepresent or delete facts from any record.

Confidentiality of Information

We protect the confidentiality, privacy and security of the information we collect and maintain. Our commitment to the protection of this information reflects the importance we place on maintaining the trust of our patients, employees, students and communities we serve. These protections extend to all forms of communication and the mediums they use. Information should be accessed and used only to the extent necessary to conduct one's duties.

Intellectual Property and Proprietary Information

We abide by all Laws and MCW policies related to proprietary and confidential information and intellectual property. Intellectual property includes patents, trademarks, copyrights and trade secrets. MCW's intellectual property is protected from unauthorized use, including theft.

4 Embracing Business Ethics

Preventing Fraud, Waste and Abuse

MCW is committed to the timely, complete and accurate documentation, coding and billing of medical services. MCW uses its best efforts to submit only accurate claims and reports to governmental authorities and does not knowingly make false or deceptive statements.

Business Transactions and Financial Reporting

We ensure all business transactions are properly authorized and recorded in accordance with applicable policies. We maintain and report complete, accurate and reliable financial information in accordance with generally accepted accounting principles. We cooperate fully with internal and external auditors and any regulatory agencies that examine our books and records. We maintain a system of internal controls to prevent fraud and ensure accuracy and completeness in documenting, maintaining and reporting financial information.

Fair Business Practices

We conduct ourselves in an ethical manner and demonstrate honesty and integrity in all dealings. We comply with all applicable state and federal antitrust Laws and conduct business in a manner that promotes fair competition. We select suppliers and service providers on the basis of quality, cost-effectiveness and appropriateness, in accordance with applicable policies. We do not accept or offer anything of value in exchange for business or patient referrals.

5 Interacting Appropriately with Third Parties

Conflicts of Interest

We avoid involvement in any decisions where we have a self-interest in the outcome or the decision could adversely influence our judgment, objectivity or loyalty in performing our duties for MCW. We avoid even the appearance of a conflict of interest by immediately disclosing pertinent facts and abiding by the decision of leadership regarding potential conflicts. Nominal gifts that do not compromise our performance may be accepted; however, we do not offer, solicit or accept any gifts or gratuities that may influence, or appear to influence, our objectivity in performing our duties at MCW.

Political Activity, Lobbying and Contributions

MCW is a nonprofit organization, and the MCW Office of Government and Community Relations is responsible for all lobbying and other government advocacy at the federal, state and local level in accordance with respective Laws. MCW encourages all members of its community to be active and informed citizens. We follow MCW's policy to ensure the positional views we express are not attributed to MCW. The use of MCW property, resources or funds to personally support a political position, party or candidate for public office is prohibited. We do not use MCW assets or our work time to personally support any political or advocacy activities not approved by MCW.

Spokesperson, Media Relations, Social Media

We release information to the media and public according to MCW Official Spokesperson policy and where required only through the appropriate channels. Faculty, staff trainees or students should never release information to the media or public without the permission of the Office of Communications. All requests from reporters should be referred to the Office of Communications. We are informative, honest and truthful in all marketing and advertising practices.

MCW supports the use of social media by its community members. We are professional and use good ethical judgement and adhere to MCW's Social Media policy when posting to optimize the social media network and foster a positive image for ourselves and MCW. We recognize that our business and personal postings on social media can impact views and opinions of MCW and potentially have unintended consequences to our professional careers.

Responding to Inquiries from Government Entities

MCW cooperates with and responds as appropriate to any request or inquiries by a government agency. We must cooperate fully with any audit, inquiry or investigation undertaken at MCW's direction by its attorneys, investigators, internal auditors or compliance personnel.

NAVIGATING & REPORTING CONCERNS

There may arise situations in which you believe a standard described in this Code is not being followed. Some options for deciding where to take your concern and determining how to proceed include discussion with your direct supervisor or others in leadership positions at MCW, or contacting the MCW Corporate Compliance Office.

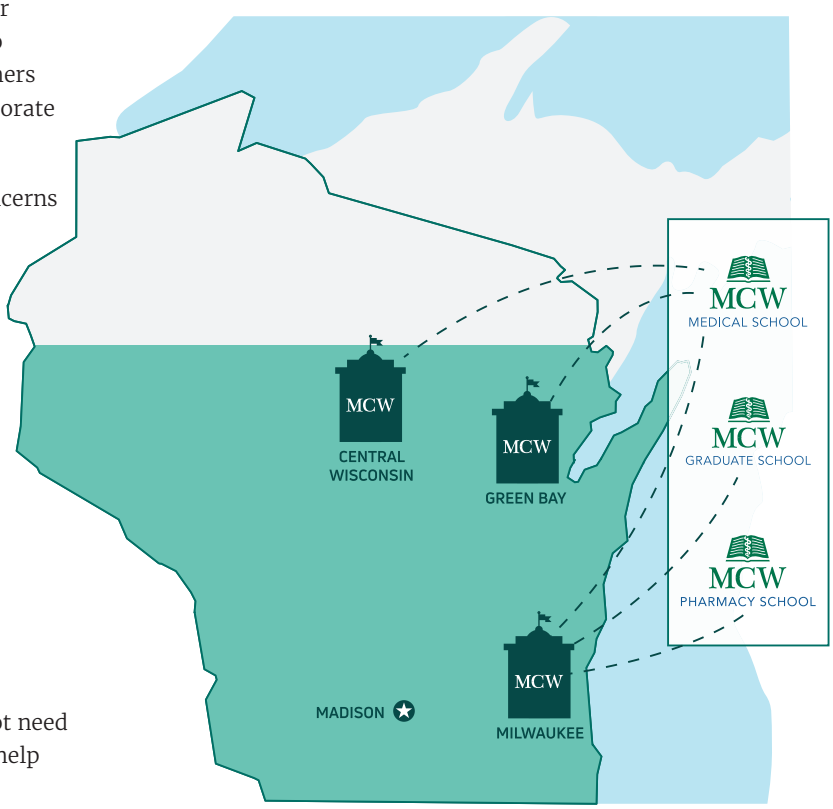
MCW has developed a tool to help guide you in reporting concerns to the appropriate administrative offices. This tool may be accessed at: **Concern Navigation Tool**. In addition, the Ombuds Office is also available to assist faculty and staff with navigating reporting options.

If you do not wish to report a compliance concern internally, you may report your concern through the MCW Confidential Reporting Hotline, which is administered by a third-party vendor that specializes in the intake and management of any compliance concern:

1-844-703-8171 or
mcw.ethicspoint.com

Calls to the Reporting Hotline cannot be traced. Callers do not need to identify themselves; however, they may do so in order to help give further information about the situation.

MCW evaluates all concerns promptly, thoroughly and fairly, and we do not act on any reported concern until it is validated. In addition, we protect the confidentiality and other rights of individuals involved in any reported concern or complaint.



OUR POLICIES

Although not an exhaustive list, the following is a set of MCW policies most directly related to the Standards described within this Code. A complete list of all MCW Corporate Policies may be found on InfoScope.

1 Acting With Integrity and Respect

Compliance with the Laws

AD.CC.020 - Compliance Reporting, False Claims and Whistleblower Protections

Reporting Violations and Protections from Retaliation

AD.CC.020 - Compliance Reporting, False Claims and Whistleblower Protections

Commitment to Non-Discrimination and Equal Opportunities

AD.CC.050 - Anti-Harassment and Non-Discrimination
AD.CC.080 - Prohibiting Sexual Harassment and Abuse in Education Programs
HR.EE.010 - Equal Employment Opportunity and Affirmative Action
HR.EE.110 - Nepotism

Professionalism

AD.CC.060 - Professional Conduct Policy
MCW Professionalism Code

Inclusion and Equity

ED.GN.070 - Student Diversity Policy
HR.EE.030 - Recruitment - Staff
HR.EE.040 - Recruitment Protocol - Faculty

2 Excelling in our Missions

Excellence in Teaching and Education

ED.GN.040 - Continuing Education in the Health Professions
ED.GN.060 - University (All Student) Handbook

Quality of Care and Patients' Rights

CL.CP.010 - Disclosure of Unanticipated Patient Outcomes
CL.CP.040 - Credentialing of MCW Providers

Innovation and Excellence in Research

RS.AN.010 - Oversight of the Care and Use of Vertebrate Animals in Research and Education
RS.GN.010 - Research Misconduct
RS.GN.070 - Ownership, Access and Integrity of Research Data
RS.GS.030 - Biological Safety Program
RS.HS.010 - Research Involving Human Subjects and/or their Private Identifiable Information
RS.RD.010 - Radiation Safety Program

3 Safeguarding our People, Resources and Information

Safe Work Environment

CO.PS.040 - Workplace Violence Preventions
HR.ER.060 - Drug Free Workplace

Protection and Use of Resources

BF.CN.040 - Fixed Asset Policy

Security and Use of Technology

IT.IS.030 - Use of Electronic Equipment
IT.PI.050 - Usernames and Passwords
IT.PI.060 - Login and Logout Procedures
IT.PI.130 - Workstation Use and Security
IT.PI.200 - Encryption for Electronic Protected Information - Mobile Devices

Recordkeeping

AD.LG.020 - Document Retention
CL.CP.080 - Open Epic Medical Records

Confidentiality of Information

AD.CR.010 - Confidentiality - Access To & Use of College, Employee, Student, and Patient Information
AD.HP.020 - Privacy of Protected Health Information (PHI)
ED.GN.030 - Family Educational Rights and Privacy Act (FERPA)

Intellectual Property and Proprietary Information

RS.GN.060 - Patent and Copyright

4 Embracing Business Ethics

Preventing Fraud, Waste and Abuse

CL.BC.010 - Billing-Documentation
CL.BC.040 - Documentation, Coding and Billing Services to Medicare
CL.BC.050 - Documentation, Coding and Billing Services to Medicaid

Business Transactions and Financial Reporting

BF.PA.010 - Business Purchases, Payments and Reimbursements

Fair Business Practices

BF.PA.031 - Purchasing Code of Conduct
BF.PA.032 - Supplier Selection
BF.PA.033 - Bids, Proposals and Quotes

5 Interacting Appropriately with Third Parties

Conflicts of Interest

AD.CC.030 - Conflict of Interest - General
AD.CC.040 - Conflict of Interest - Health Care Industry Product Interactions
AD.LG.080 - Philanthropic Gift Policy
RS.GN.020 - Financial Conflicts of Interest in Research

Political Activity, Lobbying and Contributions

AD.CR.050 - Advocacy Activities/Official Spokesperson

Spokesperson, Media Relations, Social Media

AD.CR.050 - Advocacy Activities/Official Spokesperson
AD.CR.070 - Social Media Policy

Responding to Inquiries from Government Entities

AD.LG.040 – Subpoenas and Service of Process

NAVIGATING AND REPORTING CONCERNS

AD.CC.020 – Compliance Reporting, False Claims and Whistleblower Protections
AD.CC.070 – Ombuds Office

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