

## Annual Acknowledgment and Certification of Compliance with the Code of Conduct

This is to acknowledge that I have received and reviewed the Code of Conduct for the University of Massachusetts Medical School's Commonwealth Medicine (CWM) division. I agree to comply with the standards referenced in the Code and all related policies and procedures. I acknowledge that the Code is a statement of principles for individual and business conduct and does not constitute an employment contract. I further acknowledge that it is my responsibility to understand and follow compliance standards and to adhere to the ethical principles outlined in the Code of Conduct.

I will report any potential violation of which I become aware promptly to my supervisor and/or the Office of Management (OoM). I understand that CWM maintains a policy of non-retaliation provided that the report is made in good faith. I understand that any violation of the Code of Conduct or any ethics or compliance policy or procedure is grounds for disciplinary action, up to and including termination from employment.

I further certify that I am not included on the List of Excluded Individuals/Entities maintained by the United States Department of Health and Human Services, Office of Inspector General (OIG) or the System for Award Management (SAM) list of debarred individuals maintained by the General Services Administration (GSA). I also agree to notify UMMS Human Resources, Labor Relations and Compliance if I become aware of my impending or actual exclusion or debarment as reflected on these two lists.

Date: \_\_\_\_\_

Printed Name: \_\_\_\_\_

Signature: \_\_\_\_\_

Business Unit: \_\_\_\_\_

*UMMS Privacy, Compliance and Ethics HOTLINE: 508-856-TEAM (Anonymous or Confidential) [PrivacyandCompliance@umassmed.edu](mailto:PrivacyandCompliance@umassmed.edu)*

Version date: December 31, 2019

## CODE OF CONDUCT

Commonwealth Medicine (CWM) is a mission driven organization that responds to public and private sector clients with integrity and a commitment to excellence, improves health care for people in need, and controls costs and maximizes revenues for its clients. Our employees are expected to adhere to this Code of Conduct in all aspects of their work and in their daily exchange with colleagues, other professionals, students, clients, patients, and the public. These principles are derived from federal and state laws and regulations, University policies and procedures, contractual requirements, and generally accepted principles of ethical conduct and best practices. This Code establishes minimum expectations, which provide a basis for a disciplinary framework for employees who intentionally or with careless indifference fail to abide by these principles, and it serves as a reminder to everyone that CWM is committed to the highest standards of ethical conduct.

CWM strives to provide the highest quality of services, provide a respectful work environment, uphold ethical standards, avoid conflicts of interest, maintain appropriate confidentiality of sensitive and protected health information, and adhere to all legal requirements. The Code of Conduct (the Code) outlines what we do at CWM to ensure ethical and legal compliance. Reviewing referenced policies and standards and incorporating them into your business process is an important part of your work. Employees are expected to:

1. Conduct themselves ethically, honestly, and with integrity in all dealings.
2. Exercise sound judgment and serve the best interests of CWM, the University and the clients/patients that we serve.
3. Become familiar and comply with applicable laws, regulations, University and CWM standards, and contractual commitments. Failure to comply can lead to adverse consequences in terms of CWM's reputation and finances, and it can result in a loss of privacy for individuals who we serve. All CWM compliance standards are posted on the [Office of Management website](#), and all employees are responsible for reviewing and applying these standards.
4. Comply with applicable professional standards if they are governed by ethical codes or standards specific to their professions or disciplines—for example physicians, nurses, pharmacists, social workers, attorneys, auditors, and counseling staff.
5. Participate in CWM's Compliance Program and complete all required and job-specific trainings and certifications, including, but not limited to: annual compliance, privacy and information security training. [Privacy and Security Training Standard]

6. Use computing, data and information technology resources in a responsible manner and according to the University's Acceptable Use Policy. [University of Massachusetts Acceptable Use Policy]
7. Accurately document work in compliance with legal requirements, and ensure records are available to support business practices and appropriately disposed of according to approved destruction schedules. Records must not be destroyed or withheld when subject to an investigation or when requested by subpoena or other legal process. [Records Management Standard] [University of Massachusetts Record Management, Retention and Disposition]
8. Only access those University systems which are necessary for the employee to fulfill his or her job-duties. [Access Controls Standard]
9. Promote the right of privacy for all individuals by protecting the confidentiality and security of all personal, protected health and other sensitive information as required under applicable law. [Use and Disclosure of Personally Identifiable Information Standard] [Authorization to Disclose Personally Identifiable Information Standard]
10. Ensure compliance with the University's Vendor Relations policy, to manage conflict between personal and financial interests and official responsibilities, and to comply with State and University requirements for reporting and reviewing actual and potential conflicts of interest or conflicts of commitment. Actual and potential conflicts will be reviewed and appropriate actions taken. [University of Massachusetts Policy on Conflicts of Interest Relating to Intellectual Property and Commercial Ventures: Worcester] [University of Massachusetts Implementation of Policy on Codes of Conduct for University Vendor Relationships]
11. Preserve CWM's assets, including time, equipment, supplies, and information. Assets are to be maintained and used only for business related purposes. [UMMS Encryption Policy]
12. Treat all colleagues as valuable members of the community, and treat them with fairness, respect, and courtesy. The University prohibits discrimination and harassment and provides equal opportunities for all community members. [Equal Employment Opportunity]
13. Ensure that all claims or approvals for payment submitted to the government are accurate, and that any errors or fraud related to government claims are reported and corrected. [University of Massachusetts Fraudulent Financial Activities Policy]

14. Report to a supervisor anyone, including yourself, who is subject to a federal or state exclusion as a result of an existing or recently completed investigation by a state or the federal government. [OIG/GSA Exclusion/Debarment Screening Standard]
15. Report all known or suspected improper actions that may violate any law, regulation, policy or standard. [Reporting a Breach of Personally Identifiable Information Standard] CWM maintains a policy of non-retaliation provided that the report is made in good faith. [Non-Retaliation/ Whistleblower Standard]

These principles form the basis for our commitment to ethical behavior and compliance with legal requirements. Because we cannot include or anticipate every legal or ethical issue that may arise, you must also use your own judgment, and employees must comply with all applicable laws, regulations, policies, and ethical practices whether or not they are specifically addressed in the Code.

If you have a concern about a legal or ethical issue, please report it to your supervisor. If your supervisor does not provide you with a satisfactory response or you are not comfortable raising it with your supervisor, you may contact OoM. All reports are taken seriously and reviewed and retaliation against employees for making such reports is prohibited. Although callers to the hotline or main line may remain anonymous or confidential, to enable a thorough investigation individuals are encouraged to disclose as much information as possible, including names. Reports through any mechanism will remain confidential to the extent permitted by law.

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#### **DOCUMENT HISTORY**

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Effective Date: 10/1/11  
Revision Date(s): 9/22/16; 10/3/16; 5/5/17  
Review Date(s): 12/1/18; 12/31/19