

## CE-2 – Code of Conduct and Certification

### Key Points

- This Policy applies to University Hospitals and all of its wholly-owned entities (collectively “UH”), including, but not limited to, all UH employees, medical staff members and, where appropriate, others who provide services to or on behalf of UH.
- This Policy explains the process for certifying compliance with the UH Code of Conduct.

### Policy & Procedure


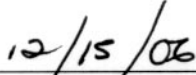
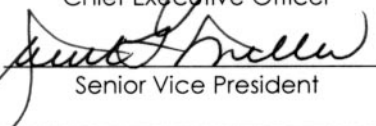
1. All UH employees and medical staff members and, where appropriate, others who provide services to or on behalf of UH will abide by the UH Code of Conduct (Code) and are obligated to promptly report any violations of the Code in accordance with the UH Policy on Making Compliance & Ethics Reports (C&E-04). The Code has been provided to each employee, will be reviewed periodically, amended as necessary and, can be found on the Compliance and Ethics page on the UH Intranet.
2. All UH employees will sign or electronically complete the C&E Certification Form (Certification Form) at least annually upon the completion of Code of Conduct training. All medical staff members will sign the Certification Form during initial appointment and upon reappointment. UH employees and medical staff members may be required to sign the Certification Form upon a significant change in their relationship to UH (e.g., a promotion to senior management, an appointment to a medical leadership position). By signing the Certification Form, the individual attests that he or she has received and read the Code and agrees to abide by the Code and report any issues or conduct known to him or her that violates the Code, UH Policy or, with respect to UH, applicable laws.
3. Failure of a UH employee to sign the Certification Form in accordance with this Policy may result in corrective action, up to and including termination.
4. Failure of a medical staff member to sign the Certification Form in accordance with this Policy may result in disciplinary action and may affect his or her credentialing status.

5. All UH employees and medical staff members and, where appropriate, others who provide services to or on behalf of UH shall receive training on the Code in accordance with the UH Policy on C&E Training (C&E-03).
6. New Employees. During orientation, new UH employees receive training on the Code in accordance with UH Policy on C&E Training (C&E-03) and receive a copy of the Code. New employees sign Certification Forms following completion of orientation and online compliance training..
7. Current Employees. The supervisor of a current employee makes adherence to the Code a requirement for each employee's annual performance evaluation. Current UH employees receive additional training on the Code in accordance with UH Policy on C&E Training (C&E-03). Existing employees sign the Certification Form upon completion of their annual Code of Conduct training.
8. Medical Staff. Medical staff members of UH facilities receive the Code and sign the Certification Form during their appointment and upon reappointment. Signed Certification Forms are to be forwarded to the C&E Department. Medical staff members of UH facilities receive training on the Code in accordance with UH Policy on C&E Training (C&E-03).
9. Storage of Certification Forms. The C&E Department shall conduct periodic audits to assure compliance. These files are retained according to UH Policy on Records Retention and Methods of Disposal (GM-1).

**See Also**

In the UH P&P:

- GM-1, Records Retention and Methods of Disposal
- C&E-04, Making Compliance and Ethics Reports
- C&E-03, Compliance and Ethics Training

APPROVALS	
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 <hr style="width: 80%; margin: 0 auto;"/> Senior Vice President	 <hr style="width: 80%; margin: 0 auto;"/> Date

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