

Office of Institutional Integrity and Awareness

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Our Values

We are One University, united by a passion for innovation and teamwork to transform lives in order to improve the lives of others by creating solutions for a healthier community.



Serve Others First



Integrity



Respect



Collaboration



Be Visionary





Integrity and Awareness Approach

The Office of Institutional Integrity and Awareness creates an integrity-based approach program that emphasizes responsibility for ethical behavior and commitment to our Code of Culture.

An integrity-based framework consists of three essential pillars: (1) instruments (e.g. ethics code, conflict-of-interest policy, whistleblowing arrangements); (2) processes (development planning, implementing, evaluating and adapting); and (3) structure (appointing responsibility and coordination). Management of this framework undertakes activities to address new and emerging risks with both a proactive and reactive approach. These pillars create a framework outline and dimensions:

1. **Determining and defining integrity**
2. **Guiding toward integrity**
3. **Preserve a culture of integrity**
4. **Fair and appropriate procedures and sanctions**
5. **Monitor external context (reputation, audit and legal)**

The integrity-based approach to compliance is a conscious process by HSC that emphasizes responsibility and integrity for ethical behavior and commitment to our Code of Culture approach. The program is driven by principles, values, leadership, organizational expectations and legal regulations. By using this proactive approach, we demonstrate the consistency of Our Values in action with choices and decisions as an institution and individually.



Mission & Vision

Who We Serve: Students, employees, vendors, agents and external community members.

The mission of the Office of Institutional Integrity and Awareness is to create solutions that build and preserve an ethical culture.

Our vision is to cultivate a purpose-inspired integrity and awareness program that will enable our team members to better succeed in their operations, risk management and decision-making for which they are individually and collectively accountable.





Strategic Goals

People: Promote the Integrity and Awareness Program through education, creation of efficient policies and procedures, and preservation of the Code of Culture as a living document.

Programs: Increase the exposure of the Integrity and Awareness approach.

Strengths: Elevate campus behavior that is governed by Our Values, mission, vision and purpose.

Elements of an Effective Compliance Program



Implement written policies and procedures



Designate compliance officer and compliance committee



Conduct effective training and education



Develop effective lines of communication



Conduct internal monitoring and auditing



Enforce standards through well-publicized disciplinary guidelines



Respond promptly to detected problems through corrective actions



Awareness

The Office of Institutional Integrity and Awareness engages employees and students to be mindful of topics about compliance and integrity by planning activities. These activities promote awareness and highlight focused resources within the department. The office also launches new training programs, hosts live training sessions and recognizes others for extraordinary teamwork.

The office hosts Integrity and Awareness Week to reflect the ongoing commitment to an ethical culture, shared values and expectations. The office hosts a variety of activities to build and strengthen our ethical culture, such as escape rooms, trivia and quizzes, scavenger hunts and live training. By engaging with the campus, the office demonstrates the importance of integrity and compliance in a values-based organization. This reinforces how all levels of the organization play an integral role in protecting the institution's resources and reputation.





Code of Culture

Everyone is accountable for following a code for which we should be very proud. With that in mind, we have purposefully titled it our “Code of Culture.” Some organizations call it a “Code of Conduct.”

The Code of Culture: Our Values in Action embodies our institution’s culture and values. Throughout this resource, you will see a consistent theme to **Be Mindful**, reminding us to have awareness of our thoughts and actions; and **Extraordinary Teamwork**, building the reputation of a team that can be trusted.

This resource serves as a guide for how we apply good judgment and integrity to the decisions we make every day, whether we are on campus or in our community. By working in the spirit of Our Values, we earn trust among our team members, community and patients.

Although this resource provides a road map for how to make sound and ethical decisions according to the law and our policies, it does not provide all details about the specific rules and regulations with which we must comply.



Policy and Procedure Management

The Office of Institutional Integrity and Awareness helps connect HSC's mission to the daily actions of its team members by ensuring access to all institutional policies. HSC policies are intended to support a safe, respectful and ethical learning and work environment for everyone. The Office of Institutional Integrity and Awareness coordinates regular policy reviews to ensure policies are aligned with state and federal laws, UNT System Regulations and Regents Rules, as well as the mission and vision of HSC.

The Office of Institutional Integrity and Awareness assists policy owners with creating policies and procedures, and collaborates with the UNT System Office of General Counsel to ensure legal sufficiency.

HSC policies and procedures are maintained in a public policy source located on the HSC website.





Minors on Campus

HSC provides opportunities for young inquisitive minds through programs aimed at educating and promoting interest in health professions. These programs introduce youth to emerging technology and transferable skills that will help them pursue careers in the medical sciences.

To promote health, wellness, safety and security of youth, HSC must comply with all federal and state laws. The Office of Institutional Integrity and Awareness oversees the Minors on Campus process and participation requirements. This includes, but is not limited to, event and program registration, staff ratios, consent forms and criminal background screenings.

We also provide education and guidance on sexual abuse and child molestation training as prescribed by the Texas Department of State Health Services. This training includes reporting suspected abuse, prohibition of certain kinds of physical and verbal interactions, and one-on-one contact with minors.



Integrity and Awareness Education

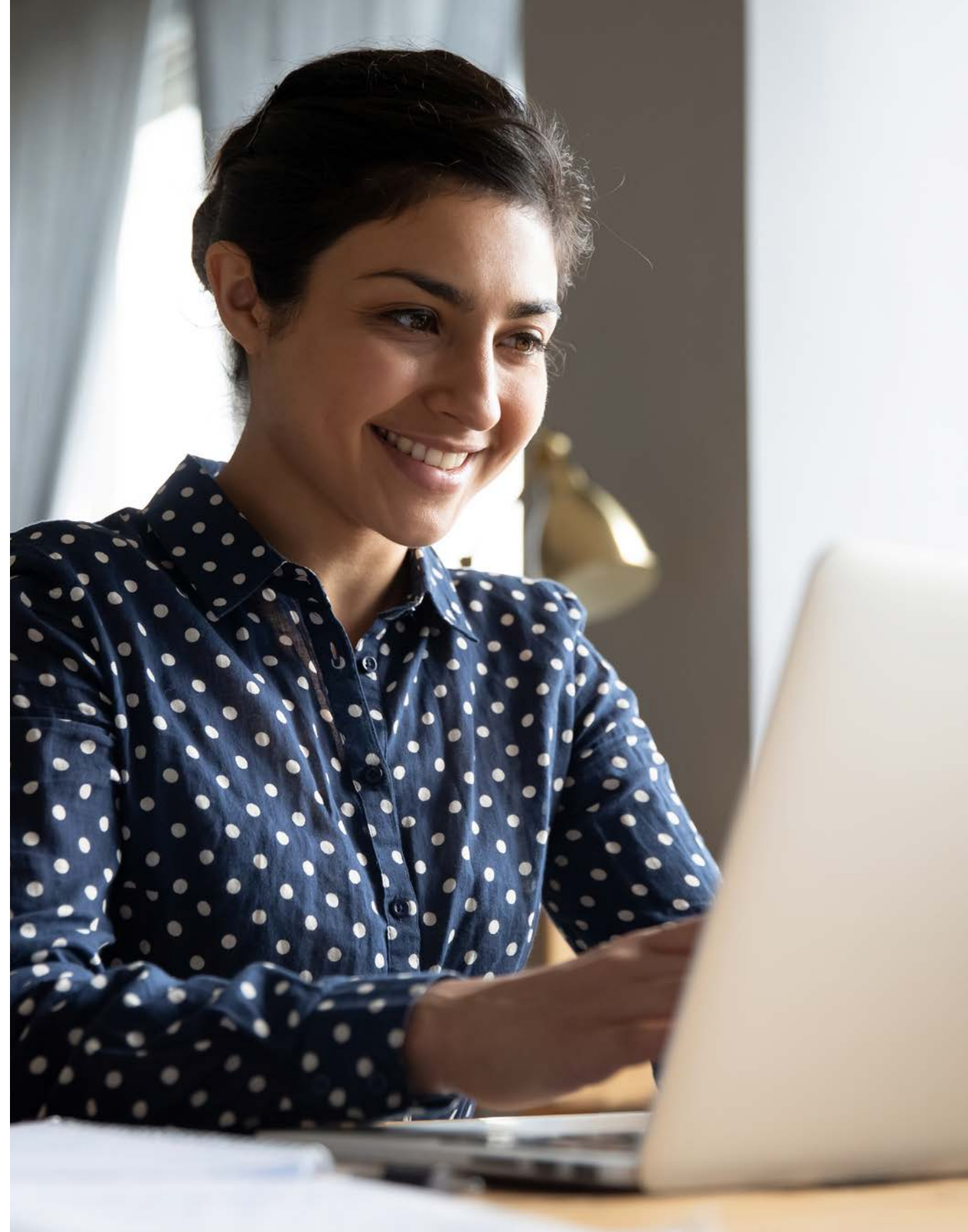
HSC Integrity and Awareness Training is intended to demonstrate the commitment of HSC to the highest standards of ethics and compliance. Applicable laws, policies and regulations require all employees and students to complete mandatory compliance and other required training annually or when an employee receives notification.

Initial (New Hire) Training: Integrity and Awareness Training and any specialized training must be completed within the first 30 days of employment.

Employee Mandatory Training: All employees must complete annual mandatory training and will be given a minimum 30-day advance notice to comply.

Specialized or Job-Specific Training: Department managers should contact the Office of Institutional Integrity and Awareness to assign specialized training.

Student Mandatory Training: This training is assigned to all students annually in the spring semester.





Conflicts of Interest

The participation of employees in external activities that enhance their professional skills or constitute public service can be beneficial to HSC as well as the individual employee. External activities may lead to conflicts of interest.

In accordance with HSC policy, an employee must disclose conflicts of interest annually on the HSC Conflicts of Interest eDisclosure Form. Additionally, conflicts of interests related to research programs require the disclosure of certain financial interests for employees engaged in the design, conduct or reporting of research.

The Office of Institutional Integrity and Awareness helps provide guidance to protect employees from undue suspicion of their external activities that may adversely influence institutional operations.

If an institutional conflict is substantiated, a management plan that outlines and implements measures will be developed by the Chief Integrity Officer and the employee's manager. In the case of a research conflict of interest, the Research Conflict of Interest Committee will develop the management plan.



HSC Trust Line

HSC encourages employees and students to report any suspected compliance concerns. The Trust Line is publicly available on the HSC website. You may also directly contact the Integrity and Awareness Office or Chief Integrity Officer.

Examples of reportable concerns include, but are not limited to, illegal or fraudulent activity, financial misstatements or irregularities, conflicts of interest, unethical conduct, and violations of laws, policies and regulations.

The HSC Trust Line provides a confidential resource for employees and students to report suspected wrongdoing in a manner that preserves anonymity and assures nonretaliation. The HSC Trust Line is operated by a third-party vendor and is available 24 hours a day and 365 days a year. All concerns will be forwarded to the Office of Institutional Integrity and Awareness, which will promptly address the allegation and will inquire and investigate as appropriate. The Trust Line is not intended to discourage HSC team members from addressing their concerns with their direct supervisor, Student Affairs or Human Resources.





Investigations

HSC is committed to ensuring that all institutional investigations are conducted in a fair, impartial and thorough manner in compliance with all applicable federal and state laws.

Every employee has a duty to report known or alleged violations of policy, even when personally involved in the violation. Authoritative personnel who receive a report of a suspected violation are expected to contact the Office of Institutional Integrity and Awareness. Employees must cooperate with all investigations by providing truthful accounts and relevant documentation in response to questions and information requests.

Compliance concerns and policy violations should be communicated through your supervisor or the Office of Institutional Integrity and Awareness or the third-party Trust Line. An initial inquiry regarding the concern will be made by speaking with the reporter, respondent and any witnesses. After the inquiry, it will be determined if an investigation is needed. Supervisors and upper management will be notified as appropriate that an investigation is in process. The Office of Institutional Integrity and Awareness will work in collaboration with the appropriate department to provide feedback to the reporter regarding the investigation, providing the issue was not reported anonymously. Sources who report anonymously can receive updates through the Trust Line.

Human Resources, Equal Employment Opportunity, Title IX or Student Affairs may investigate compliance concerns. Concerns about accounting and financial fraud will be reported to UNT System Internal Audit. In certain situations, the UNT System Office of the General Counsel may assume responsibility of an investigation.

If allegations are substantiated, the Chief Integrity Officer will make recommendations for disciplinary action up to and including termination. In most cases, the respondent's manager or supervisor will determine the final disciplinary action. In some instances, violation of policy may also have legal implications, subjecting the employee and/or institution to civil or criminal penalties, fines or other sanctions.

Non-Retaliation and Protection from Retaliation

HSC does not tolerate retaliatory behavior. Retaliation is the treatment or condition likely to dissuade a reasonable person from reporting, causing to report or from participating in an investigation of suspected misconduct or a related proceedings, including an action that affects an individual's enrollment, academic progress or business relationship; or an employee's compensation, promotion, transfer, work assignment or performance evaluation. The Office of Integrity and Awareness will review complaints of retaliation and any attempted or actual retaliatory action.

All employees and students have the right to make a "good faith" report of suspected misconduct to the appropriate authority. An employee or student who comes forward in good faith to report actual or suspected misconduct will not be subject to retaliation. **This protection does not extend to self-reported violations.** Team members are prohibited from retaliating against any person or relative of any person who is an employee or student who reports suspected wrongdoing, cooperates with a compliance investigation, or seeks guidance about compliance concerns in good faith.

Any employee who believes he or she is experiencing retaliatory action by another individual as a result of good faith reporting, participation in an investigation and/or filing a complaint is strongly encouraged to report this to the Office of Institutional Integrity and Awareness.

Individuals found to have engaged in retaliation are subject to immediate disciplinary or administrative action, including termination of employment. Students will be subject to the disciplinary process in accordance with the Student Code of Conduct and Civility.

An employee is subject to disciplinary action up to and including termination if they make a false report of retaliation, actual or suspected misconduct, or knowingly provide false answers or information in response to an ongoing investigation.





Privacy

The Health Insurance Portability and Accountability Act (HIPAA) Privacy Rule establishes national standards and regulates who can have access to Protected Health Information (PHI), circumstances in which it can be used and to who it can be disclosed.

The Chief Integrity Officer serves as the Privacy Officer for HSC. The Office of Institutional Integrity and Awareness provides guidance to help navigate regulatory obligations and ethical principles pertaining to the protection, maintenance and use of health and personal data.

The office monitors for breaches of the HIPAA Privacy Rule, the proper handling and disposal of PHI/Personable Identifiable Information (PII), and display of the HSC identification badge. The office also collaborates with Information Security on proper measures to secure electronic devices. With the use of an outside vendor, the office provides consoles to securely place PHI/PII until it can be shredded. The office also provides larger bins when additional capacity as needed.

There is a retention schedule associated with disposal of some PHI/PII that must be strictly followed; please consult with Records Management.



Health Care Compliance

Health Care Compliance is the ongoing process of ensuring that legal and regulatory guidance provided by the Department of Health and Human Services (HHS) Office of Inspector General and other federal and state agencies are met in the delivery of patient care, billing and reimbursement. HSC complies with all applicable federal and state health care billing laws and regulations.

The Office of Institutional Integrity and Awareness audits medical records, monitors risks and detects anomalies in health care record documentation. Coding and billing strategies are implemented to guarantee documentation supports the information reported that minimizes billing compliance risks, optimizes revenue, and prevents fraud, waste and abuse in medical claims.

Clinical providers are ultimately responsible for the accuracy of medical claims filed for services. Medical services must be recorded according to guidelines and instructions; every effort must be made to ensure that coding is accurate.



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