



Jefferson

HOME OF SIDNEY KIMMEL MEDICAL COLLEGE

We Do the Right Thing

Jefferson's Code of Conduct
& Ethical Behavior



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— A Message from Our Leadership

We Trust each other to Do the Right Thing

At Jefferson, our Code of Conduct is the foundation of our commitment to integrity, excellence, and ethical behavior. The Code is here to guide every decision and action we take as part of the Jefferson community.

Who Follows the Code:

- All Jefferson community members are expected to follow The Code.

Why It's Important:

The Code of Conduct ensures we uphold Jefferson's reputation and maintain our shared commitment to doing what's right.

Action Items:

Familiarize yourself with the Code and let it guide your actions. By doing so, you help strengthen our organization's future and protect its reputation.



[Click here to watch Dr. Cacchione's full video message.](#)

If You See Something, Say Something

It is our responsibility to speak up if we see something that could be a potential Code of Conduct violation. Jefferson offers several ways to report concerns, including speaking directly to a supervisor, contacting HR, the Office of Legal Affairs, the Enterprise Corporate Compliance Office, or using the 24/7 Jefferson Alert Line, where you can report anonymously and track your submission.

Reporting concerns is crucial for maintaining a culture of honesty and accountability, and every report is treated with the utmost care and seriousness. Speaking up helps ensure that issues are addressed promptly and appropriately.



Mission, Vision, & Values



Our Mission

We Improve Lives.



Our Vision

Reimagining health, education and discovery to create unparalleled value.



Our Values

The behaviors we demonstrate daily to patients, students, and our colleagues enable us to continue to achieve our mission.

Our values define who we are as an organization, what we stand for, and how we continue the work of helping others.

These values are:



Put People First

Service-Minded, Respectful & Embrace Diversity



Be Bold & Think Differently

Innovative, Courageous & Solution-Oriented



Do the Right Thing

Safety-Focused, Integrity & Accountability

ALERT LINE



Introduction

ALERT LINE 



About Our Code

At Jefferson, we are a diverse team of talented people who share common values and a common mission to improve lives. We can achieve our mission by working together, as One Jefferson, to do the right thing. Our Code of Conduct and Ethical Behavior (the Code) sets forth standards of conduct that reflect our values.

What happens when we do not follow the Code?

We are each expected to live up to our values and the standards outlined in the Code. When we don't live up to those standards, we:

- let each other down and negatively impact our culture;
- harm Jefferson's reputation for integrity and excellence; and,
- may be subject to disciplinary action up to, and including, termination of employment or contract.

The Code, along with our policies and procedures, provides guidance on:

- acting with honesty and integrity;
- complying with all applicable laws, rules, and regulations;
- seeking advice and guidance when we need it; and
- being bold and speaking up when we see something that does not comply with these standards.



About Our Code

What happens when someone makes a report of a possible violation of the Code?

We take all such matters very seriously. All reports of possible misconduct will be promptly reviewed and, if necessary, investigated by appropriate personnel designated by the Enterprise Corporate Compliance Office. The details of the report and information obtained during the investigation will be kept confidential to the extent possible and allowable by law. Jefferson community members may be called upon to participate in an internal or external investigation of alleged misconduct. We each have a responsibility to cooperate fully with these investigations. We must never interfere with an investigation by altering or destroying related documents or evidence. Information provided will only be shared with people who need to know in order to resolve the issue and take corrective action.

We will not tolerate any form of retaliation taken against anyone for reporting concerns in good faith or for cooperating in an investigation. If you feel you have been retaliated against in response to reporting a concern or cooperating in an investigation, you should report it to your supervisor, a higher-level manager, the Enterprise Corporate Compliance Office, Human Resources, or Office of Legal Affairs.



ALERT LINE

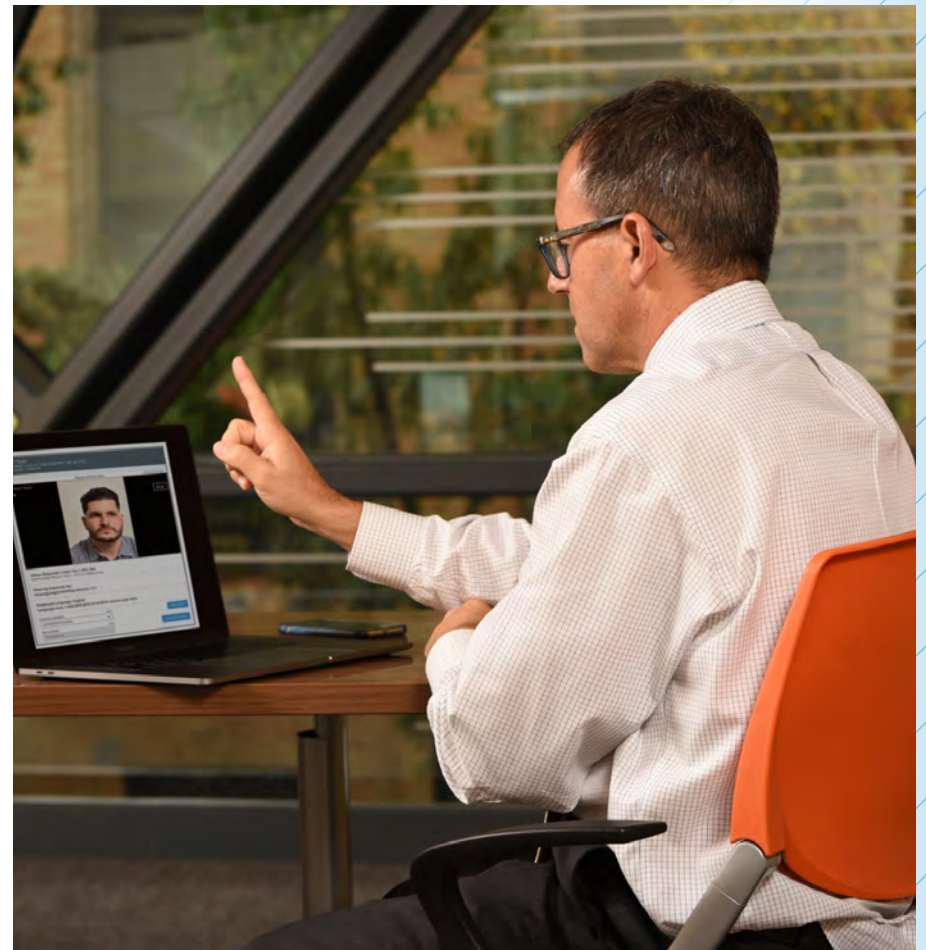


Doing the right thing means we:

- communicate honestly with others and foster an open and inviting environment where a variety of ideas and opinions can be considered;
- honor our commitments and consistently provide quality services;
- take ownership of our successes as well as instances where we may have been unable to meet Jefferson's high standards for excellence; and
- are truthful when required to certify or attest to activities performed in our capacity as a Jefferson employee or agent.

Throughout the Code are examples, policy references, and other resources that help us apply these standards to our daily work. In some instances, our policies and procedures that support the Code may cover certain subjects in more detail, but they should always be aligned in principle with the Code. If we believe that the Code conflicts with any Jefferson policy or procedure, we should raise our concern with our immediate supervisor, or our local Compliance or Human Resources office. In the unlikely event that the Code conflicts with one of Jefferson's policies, we follow the Code. We can access Jefferson's policies online or by contacting our local Compliance office.

Our Code of Conduct and Ethical Behavior applies to all Jefferson community members whether we are working at a Jefferson facility or remotely in accordance with our Flexible Work and Telecommuting Arrangement Policy. The Jefferson community includes members of the Board of Trustees, senior leadership, faculty, clinicians, researchers, administrators, employees, volunteers, contractors, vendors and anyone working on Jefferson's behalf.



Make the Right Decision

Although our Code is a resource for helping us make decisions and take actions that are consistent with our values, it cannot cover every possible situation we may encounter at work. We trust that everyone wants to do the right thing, so in situations where the right choice may not be clear, use the decision tree on the right side for guidance to help you to make the right decision.



If your actions follow the law, our Code, and Jefferson's policies, align with our values, won't harm others or negatively affect Jefferson, and you'd be comfortable seeing them in the news, you're good to proceed.

Our Responsibilities

Fostering a community of professional integrity, honesty, and excellence requires the commitment of everyone in the Jefferson community. We are each responsible to:

- read, understand, and regularly confirm our commitment to follow the Code;
- complete all required training;
- promote a culture of integrity, trust, respect, and excellence;
- ask questions when we are unsure about what to do;
- hold ourselves and each other accountable; and,
- speak up if we have good faith concerns about possible violations of the law, our Code or Jefferson policies.

Leaders in the Jefferson community, including all people in supervisory positions, have added responsibility to:

- clearly communicate expectations for high standards of behavior and lead by example;
- exercise our responsibilities in a professional and thoughtful manner, treating all Jefferson community members with dignity, equity, and respect; and,
- create an environment of trust where community members can raise concerns without fear of retaliation.

As leaders, we must respond appropriately when community members report their concerns to us. That means listening carefully, gathering facts to understand the nature of the concern, and reporting it to the appropriate people for further review. When following up on concerns, we are expected to apply the guidance set forth in the Code to guarantee a safe and respectful professional and academic environment.



Be Bold and Speak Up



Speaking up about a possible violation of the Code, other Jefferson policies, or the law is the right thing to do. The sooner we know about a problem, the sooner we can address it, minimize any potential harm, and live up to our commitment to a culture of ethics and integrity.

Speaking with our immediate supervisor is usually the best place to get answers to our questions or to raise concerns; but we may also report good faith concerns about any potential violations to a higher-level manager, our local Enterprise Corporate Compliance Office, Human Resources, or Office of Legal Affairs.

If we are ever uncomfortable or unable to ask questions or report concerns using any of the above-mentioned resources, we may use Jefferson's 24/7 Alert Line at **833-ONE-CODE (833-663-2633)** or <http://jefferson.ethicspoint.com>.

- **Alert Line Process**

If you are not comfortable reporting your concern to any of the above resources, you may report your concern to the Alert Line.

- **Anonymous Reporting**

If we choose to report a concern anonymously, the Alert Line system will provide to the reporter a reference number, password, and contact date. The reference number and password can be used by the reporter to track the status of the matter reported or provide follow-up information. Keep in mind, it makes it easier for Jefferson to promptly follow up and investigate reported concerns if we identify ourselves.

- **Confident Reporting**

We will not tolerate any form of retaliation taken against anyone for reporting concerns in good faith or for cooperating in an investigation. If we feel we have been retaliated against in response to reporting a concern or cooperating in an investigation, we should report it to our supervisor, a higher-level manager, our local Compliance office, Human Resources, or Office of Legal Affairs.



Good Faith means that to our knowledge, the information we are providing is complete, truthful, and accurate. A report is considered not in good faith if it is made with the knowledge that it is false.



Retaliation means any adverse conduct taken against a person who raises a concern or participates in an investigation of misconduct. It can include shunning or harassing the person, making threats intended to intimidate them, or taking an employment action against them because of their report or participation in an investigation. Retaliation is against the law and Jefferson policy.



Q

I saw something at work that probably violated Jefferson's Code of Conduct but I do not want to report it because I do not want to be seen as a troublemaker. Others know about it, so they might report it. I don't have to report it, right?

A

We are all responsible for speaking up when we believe something violates the law, our Code of Conduct, or other Jefferson policies. Even if we are not personally involved, failing to speak up or raise the issue to others who can take action means we are missing the opportunity to build the culture that reflects our values. When you see something, say something.



Q

What happens when someone uses the Alert Line to Report a Concern?

A

All contacts made through Jefferson's Alert Line are handled by an independent vendor who gathers important information from the individual making the report and transmits it to the Enterprise Office of Corporate Compliance for handling. The details of the report will be kept confidential to the extent possible and allowable by law.

Jefferson community members may be called upon to participate in investigations conducted to evaluate reported concerns. We each have a responsibility to cooperate fully with these investigations. We must never interfere with an investigation by altering or destroying related documents or evidence. Information provided during investigations will only be shared with people who need to know to resolve the issue and take corrective action. Remember, Jefferson prohibits retaliation against anyone who raises a concern in good faith or participates in investigations.



Speak Up: The Right Choice

No matter where you work or what you do, you're part of the interconnected community that is our enterprise.

And if you ever see something wrong, you have the choice to make it right.

Whether it's a conflict of interest, financial or information mishandling, bribery, safety violations, harassment, improper sales tactics, discrimination, or any other behavior that violates our policies, values, or the law, the choice you make to speak up can mean a wrong is made right.

If you think, "it's not my responsibility" or "nothing I do will make a difference," the problem will persist, continuing to damage Jefferson's reputation and our people.

But when you hear the voice within you saying, "something must be done" and make the choice to speak up, you're taking a stand for integrity; for the values that make our workplace safe and gratifying; and for the ethical standards that are the foundation of every aspect of our business.

When you make the choice to speak up, you're protecting a reputation that's taken years to build, and thousands of dedicated employees to maintain.

You'll be among those who've made Jefferson better by choosing to speak up to right the wrongs they've seen or just asking questions when the way forward was unclear.

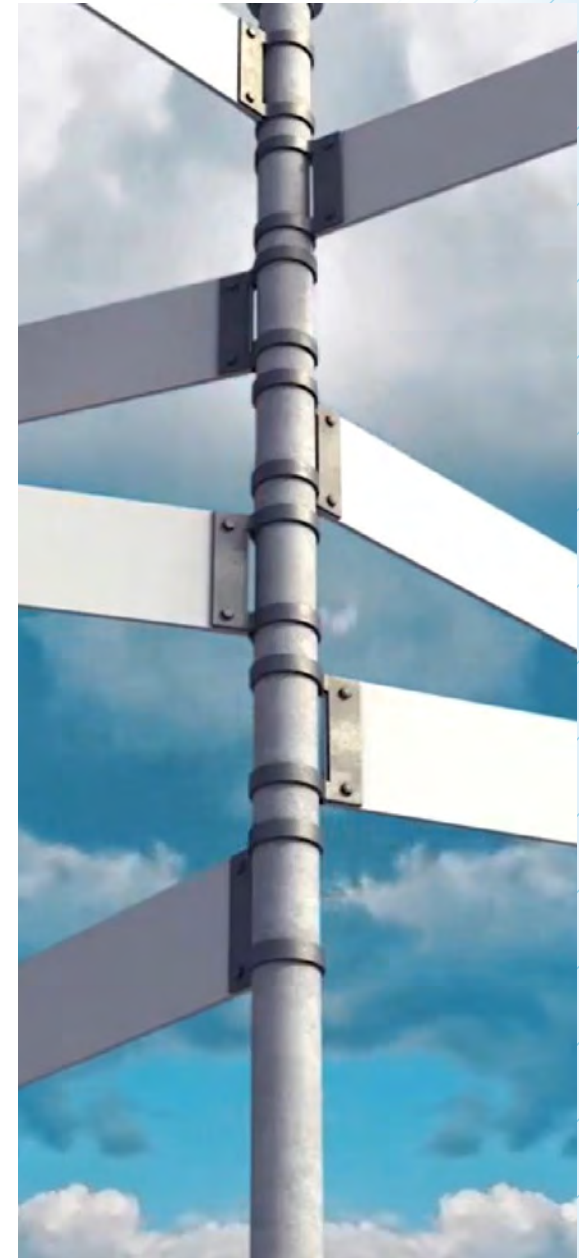
With strength.

With pride.

Without fear.

Yes, speak up!

It's the right choice to make.



ALERT LINE





ALERT LINE 

**We Care for our Patients,
our Students, our Members,
and Each Other**

We are Committed to the Highest Standards of Care

At Jefferson, we provide a high standard of care by treating everyone with respect and compassion. We are committed to preventing harassment and sexual misconduct, safeguarding private information, and maintaining a safe and healthy work environment. By prioritizing these values, we ensure excellence and integrity in all our interactions.

We Care for our Patients and Health Plan Members

We pride ourselves on being service-minded and providing high-quality, cost-effective, and compassionate services to meet student learning needs, patient's medical needs, and the needs of our Health Plan members.

We must possess and maintain appropriate experience, credentials, training, licensing, and continuing education related to our professional responsibilities; and, only provide care within the scope of our licensing and credentials.

Whether we are directly involved in the delivery of patient care, educating our students, serving our Health Plan members, or contributing in another role, we are all committed to the highest standards of care.

Doing the right thing means we:

- treat everyone with dignity and respect;
- commit to the safety of every member of our community, every time;
- never discriminate based on sex, age, race, color, religion, creed, sexual preference or orientation, gender identity, marital status, pregnancy, national origin, ancestry, citizenship, military status, veteran status, handicap or disability, socioeconomic status, or other protected characteristics;
- respect each person's right to make informed medical decisions about all aspects of their care, including the right to refuse care or to provide an advance directive, understanding that an advance directive is not required in order to receive care and treatment;
- listen carefully to patients/members, provide clear and complete explanations, ensure that communications are delivered in a manner that is accessible to the intended recipient;
- document fully all patient care information; and,
- speak up when you see an issue so that we may address it going forward.



Advance Directive

An **Advance Directive**, such as a living will or durable power of attorney for healthcare, is a document that expresses a patient's choices about the patient's future care or names someone to make decisions for them, if the patient cannot speak for themselves.





Q

Another nurse told me about something they believed to be a patient safety issue. What should I do?

A

If we see or hear about a quality or safety issue related to patient care, we should report it to our direct supervisor or another Jefferson leader. Some issues may require review by multiple departments and leaders to ensure appropriate steps for corrective action.

Q

One of the patients under our care wants to make a formal complaint about the care they received. Am I supposed to help them with that?

A

Yes. Patients and Health Plan members have a right to file complaints about their care without fear of any kind of retaliation. We should direct patients with complaints or concerns about their care to our local Office of Patient and Family Experience and/or the manager of the department from which they received their clinical care. Also, honor patient requests for contact information to regulatory or other agencies, such as The Joint Commission and the Department of Health. It is important to distinguish between a patient complaint to us as a facility and a Health Plan member complaint or grievance. If a Health Plan member contacts us with a complaint or grievance, we should refer those matters to the Health Plans' Legal/ Complaints, Grievances & Appeals (CGA) Unit.



ALERT LINE



We Treat Everyone with Respect

At Jefferson, we believe that a diverse and inclusive environment, free from discrimination and harassment, is fundamental to our mission for the advancement of education and health. We demonstrate that we Put People First when we treat everyone with respect and embrace diversity. When we promote and cultivate an inclusive and accessible environment that celebrates the uniqueness of our employees, patients, members, students, and the communities we serve, we are fulfilling one of Jefferson's most important values.

Doing the right thing means we:

- cultivate an inclusive environment where everyone is respected, valued, and supported;
- provide all current and prospective employees equal opportunity when making employment decisions of any kind;
- never discriminate against anyone on the basis of sex, age, race, color, religion, creed, sexual preference or orientation, gender identity, marital status, pregnancy, national origin, ancestry, citizenship, socioeconomic status, military status, veteran status, handicap or disability, or other protected characteristics;
- never engage in or tolerate conduct that could be considered harassment; and
- immediately report any good faith concerns about discrimination, harassment, or other offensive behavior.



Click here to view the [Non-Discrimination, Anti-Harassment, Anti-Retaliation and Reasonable Accommodation Policy, 200.79](#)



Discrimination is any prohibited act or failure to act, based in whole or in part on a person's sex, age, race, color, religion, creed, sexual preference or orientation, gender identity, marital status, pregnancy, national origin, ancestry, citizenship, military status, veteran status, handicap or disability, or other protected characteristics that has a negative impact on privileges, benefits, or working conditions, or results in unequal treatment of employees, applicants, students, patients, or other Jefferson community members.





Q

I am an employee with a mobility challenge. I find it difficult to gain access to certain buildings while I am working. I love my job and do not want to seem dissatisfied with my work environment, but think other people may experience the same challenges when they try to access some of our spaces. Maybe I should just wait until someone else says something.

A

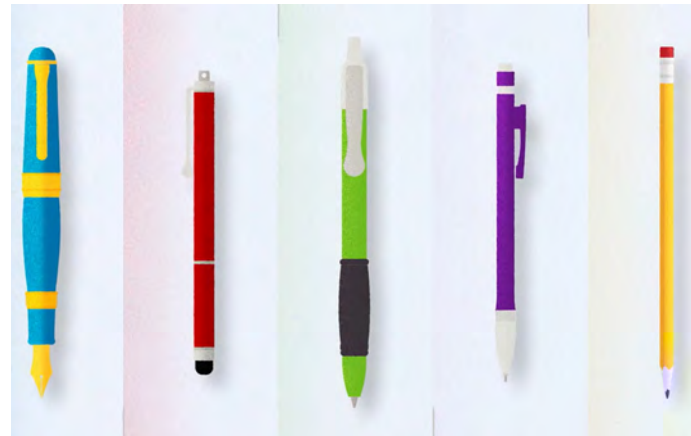
Your voice matters. We believe in an inclusive environment that contemplates the needs of our diverse community. We encourage you to speak up when you see something that may be improved. If you are uncomfortable speaking with your immediate supervisor about what you see, you can make your experiences and recommendations known by calling the Alert Line. Providing details about where you experience challenges with access and how you think those issues may be addressed will create an opportunity for Jefferson's leaders in those spaces to assess and address any issues reported.

Q

I have noticed on our regular team video calls, that someone has a habit of commenting on another person's appearance. It's usually very complimentary but I am not sure it's appropriate. Should I say something?

A

The Code may not speak to every situation we encounter, but it provides standards to guide our behaviors and help us align them with Jefferson's mission, vision, and values. An occasional, general compliment may be acceptable. However, repetitive comments may impact the experiences of individuals on the call and/or the individual about whom the comments are made. It is important to ask questions and report things that cause concern. Please contact your supervisor, a higher level leader, HR, your local compliance team, or the Office of Legal Affairs for guidance. Good faith reports and questions help everyone learn more about how to live the Code.



ALERT LINE

Sexual Misconduct

We have a zero-tolerance policy for all forms of sexual misconduct or harassment. Sexual misconduct and harassment include but are not limited to, unwelcome sexual advances, requests for sexual favors, and other coercive behavior of a sexual nature.

Suspected sexual misconduct or harassment involving students or within education programs triggers certain policies and procedures under Title IX, a federal law. If we have been made aware of instances of student or education-related sexual misconduct, we are required to report the incident to our local Title IX Coordinator.



Click here to view the [Policy on Equal Employment Opportunity and Diversity, 200.90](#)



Harassment is any unwelcome conduct that might reasonably be considered offensive to another person, interfere with their ability to do their work, or otherwise create an intimidating, hostile or offensive work environment. It may include:

- verbal abuse, such as insulting, teasing, or mocking another person or group;
- offensive or inappropriate physical contact, comments, jokes, or advances;
- physical assault or stalking;
- displaying or communicating derogatory, demeaning, or hostile materials; or
- repeated unreasonable actions intended to intimidate, degrade, or humiliate another person.



We Protect Private Information

Patients, students and our fellow Jefferson community members trust us with their personal and confidential information so that we can do our work effectively. This may include personally identifiable information (PII) and protected health information (PHI). It is our duty to protect their privacy and this information by complying with all applicable privacy and data protection laws, such as the Health Insurance Portability and Accountability Act (HIPAA) and the Family Educational Rights and Privacy Act (FERPA).

Doing the right thing means we:

- review, understand, and comply with the relevant Jefferson policies on confidentiality, privacy, data protection, and records management;
- know who is and is not permitted to access confidential or other protected information;
- access, use, and share only the minimum amount of information authorized to complete our job duties and responsibilities, such as information needed for an individual’s care, academic enrollment, or other Jefferson business operation;
- safeguard usernames and passwords;
- never leave confidential or protected information unattended or place such information in unsecured bins or other areas; and
- promptly report any possible data breach to the local Privacy Officer.



Click here to view the [**Acceptable Use Policy, 126.03**](#)
[**Privacy/Confidentiality of Health Information - Corporate Policy, 134.01**](#)



Personally Identifiable Information or data (PII) includes any information that can reasonably be used to identify, contact, or locate an individual directly or indirectly. Some examples include telephone numbers, email addresses, banking or financial information, government identification numbers, health information, biometrics, race, and ethnicity among other things.



Protected Health Information (PHI) includes all confidential records and information relating to a patient, student, or other Jefferson community member’s medical records, billing records, communications regarding medical care, or any other individually identifiable health information.





Q

My colleague who works in the hospital told me that a professional athlete came to Jefferson for treatment. My colleague is not involved in the patient's care but has access to the medical record. They know I am a big fan of this team, so they told me that they took a quick look at the athlete's medical record and told me it does not look good for his performance next season. I know they probably should not have told me, but since I do not plan on telling anyone, it is probably okay, right?

A

No. Your colleague's actions violated Jefferson's policies. Only those with a legitimate business reason may access, use and disclose patient information. A patient's medical condition or status should never be shared with someone who is not involved in that patient's care. You may not want to get your colleague in trouble, but their actions should be reported to the Privacy Officer, another Jefferson leader or the Alert Line.

Q

My sister's ex-husband is a Health Plan member and my sister is in need of his new mailing address. Can I look it up on our system and give it to her?

A

No. We may only access a person's record when we have a legitimate business need to know. Looking up your ex-brother-in-law's address and sharing it with your sister, would be a violation of the Code of Conduct and relevant policies and could have negative consequences for you and for Jefferson.

Q

A friend of mine works in the office of the registrar and told me that someone we both know is failing their classes. I know our mutual friend is under a lot of stress and I would like to help them, but I am not sure I should have been told about their grades. Was it okay for my friend to tell me so that I could help?

A

No, it was not okay. The privacy of education records is protected under federal law and must not be shared without the individual's consent. Your friend in the office of the registrar should only use the information they need to complete their job duties and nothing more. They should never share protected personal information with someone who does not have a business need to know. Their actions are a violation of FERPA and Jefferson policy and should be reported to the Privacy Officer or through the Alert Line.



We Maintain a Safe and Healthy Work Environment

We put people first and we are safety-focused. We promote a culture of health and safety that benefits patients, students, staff, and the entire Jefferson community.

Patient Safety

Patient safety and well-being is of the utmost importance to us. To ensure patient safety at all times, we are required to participate in patient safety and quality initiatives and take individual responsibility for identifying and reporting risks. We must report all concerns about patient safety in clinical care.

Occupational Safety

It is also critically important that we maintain a healthy and safe environment by engaging in best practices for occupational safety, such as:

- disposing of all medical and hazardous waste, and other products in accordance with applicable laws and regulations;
- staying informed of potential and known hazards in the workplace;
- coming to work mentally and physically fit for duty and remaining fit while on duty;
- never using, possessing, or being under the influence of alcohol or illegal drugs, or any drugs that impair our ability to perform our work safely; and,
- providing appropriate evaluation and treatment for anyone injured at work.



We were really busy on a recent shift and one of my co-workers suggested we let someone without the appropriate credentials provide service to a patient so we could get caught up. They reasoned that this person had seen us do the procedure numerous times and knew what they were doing. I disagreed and we did not allow it. Did I do the right thing?



Yes. To ensure the trust of our patients and the quality of our services, patient care must only be provided by properly qualified individuals.



Personal Safety

We are committed to the personal safety of patients, students, and staff in our work environment. We do not tolerate threats or acts of violence, harassment, intimidation, or other disruptive or unsafe behavior in and around the workplace. If we are aware of any such behavior, we should report it to our local Office of Campus Safety and Security, an immediate supervisor, or our local Human Resources Business Partner or leader.

Unless expressly permitted to do so under Jefferson policy, we may not keep weapons of any kind on our person, on Jefferson property, or while conducting Jefferson business, regardless of whether we are licensed to carry the weapon. Possession of chemical sprays in small quantities for personal protection is allowed.

Doing the right thing means we:

- promote a culture of health and safety;
- follow all policies, professional standards, laws and regulations related to maintaining a safe and healthy work environment; and,
- report to our supervisor all work-related injuries and illnesses, injuries to non-employees, damage to property resulting from Jefferson's business activities, and any unsafe conditions that we cannot immediately and safely correct.



Q

A colleague was called in to work to backfill someone who was sick. When they arrived, they smelled like alcohol. I am worried they could be impaired. What should I do?

A

It is against policy to work under the influence of alcohol or substance that could impair our ability to perform our duties safely. If you suspect any unsafe behavior such as working under the influence, we rely on you to be bold and speak up to your supervisor or Human Resources. Remember, Jefferson prohibits retaliation against anyone who raises a concern in good faith.



Working Remotely: Breaking the Fourth Wall

Lights. Camera. Action.

Another online video meeting with your coworkers... and you're on.

How are you looking this morning?

Where's a stylist when you need one?

Wardrobe? At-home casual.

Maybe too casual.

Setting? The bedroom.

The only place where it's quiet.

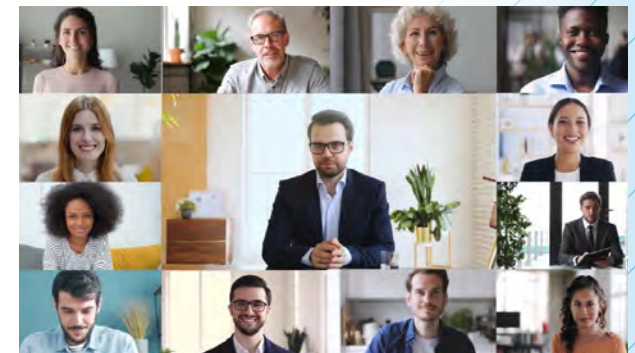
It might be uncomfortable for others to see where you sleep.

It's like breaking down that fourth wall.

- The one that actors create to separate themselves from the audience...
- ...but that breaks down when they acknowledge the audience is there.
- This is unfettered access to your private life that you have allowed your coworkers and clients to see. On camera.
- Working remotely and communicating with coworkers and clients using online video meetings creates some unique workplace issues.
- Such as... The manager conducting a one-on-one meeting who intrusively asks their colleague to "show me around your place." The employee who proudly sports a t-shirt with a sexually suggestive design.
- The coworker's family member who unwittingly dashes across the background, half dressed. Working from home, you or your coworkers may let down some boundaries that are normally there when working at the office.
- When these types of incidents happen it changes the nature of the workplace, and not in a positive way.
- That is why it is important to remember that even though you may be working from home, you're still an employee of our company.
- Our company policies and values of respect still apply.
- Careful communication still applies.

Manners and meeting etiquette still apply.

- If you're uncomfortable using your video camera during a meeting, it's okay to let your coworkers know.
- You can also change your video background to protect your privacy if the meeting app has that function.
- If you experience or see any behavior that violates our policies or company values, we encourage you to speak up.
- Say something in the moment.
- Your coworkers may be unaware of how they are appearing to others.
- Or if it's more comfortable for you, reach out to the same reporting channels you would if you were in the office.
- Remember, the fourth wall may be broken, but we are all still building a culture of respect.



Empowering an Inclusive Environment

Ever found yourself in a meeting where the conversation seems, well, unbalanced? Some people aren't contributing at all, while others are contributing a bit too much?

It can be overwhelming to make sure everyone contributes ideas and participates when there are so many different work styles, personalities, and skills.

But remember: Diversity of thought improves overall team performance.

So how do we find balance?

Whether you're leading the meeting or attending it, here are some tips that can nurture healthy collaboration.

- Assume good intentions.
- Rather than saying, "You didn't explain that very well," say, "Could we discuss this a little further?" Remain impartial.
- We all have different lived experiences, and those provide invaluable insights.
- Encourage participation.
- Is a team member hesitant to share?
- Try using a prompt:
- "You shared some great ideas with me last week.
- Could you recap for the team?" Speak up.
- When you see unfair treatment, tell HR or a manager.
- They want to help you solve issues.
- Express gratitude for the team's contributions.
- This is a great way to make everyone feel valued.

Diversity is balance.

And inclusion - that's how we achieve it.



Click here to view the [Flexible Work and Telecommuting Arrangement Policy, 200.97](#)





ALERT LINE 

We Act with Integrity

We are Honest in our Interactions, Communications and Business Practices

We strive to build a foundation of trust with our colleagues, patients, students, customers, families, and every other individual and entity with whom we do business. To do this, and to uphold Jefferson's reputation for excellence, we must exercise honesty and integrity in every communication, interaction, and business practice.

Doing the right thing means we:

- communicate honestly with others and foster an open and inviting environment where a variety of ideas and opinions can be considered;
- honor our commitments and consistently provide quality services;
- take ownership of our successes as well as instances where we may have been unable to meet Jefferson's high standards for excellence; and
- are truthful when required to certify or attest to activities performed in our capacity as a Jefferson employee or agent.



We Uphold the Standards for Academic and Research Integrity

In our efforts to redefine what is humanly possible, we dare to ask bold questions and seek to find the answers through our work. By bringing together different people, ideas, and perspectives, we find innovative solutions for real-world problems. Whether in education or healthcare, we each have a responsibility to uphold our reputation for acting with integrity in our research and academic pursuits.

Doing the right thing means we:

- are honest in how we represent our own work, words and ideas and we respect the intellectual property of others;
- ensure the accuracy of research data and results, and acknowledge all contributors;
- protect the safety, dignity, and rights of subjects involved in research projects and provide full explanations of all services that they receive;
- identify actual or potential conflicts of interest, and disclose all such relationships and activities;
- obtain official approvals for research activities and adhere to all ethical and legal obligations, contractual agreements, and Jefferson policies.



I am working as an assistant to help my professor put together an article for publication. In reviewing the draft publication, I noticed that they misrepresented some of the research results that contributed to their conclusion. When I pointed it out to them, they told me I was mistaken but I know I am correct. I am concerned they misrepresented the data to support their conclusion. If discovered, this could really hurt Jefferson's reputation. What should I do?



If you have a good faith concern about your professor's intended actions, you should report it to the Research Compliance Officer, the Office of Legal Affairs, or through the Alert Line so that it can be properly investigated, and corrective action taken if needed.



We Avoid Conflicts of Interest

We all have a duty of loyalty to Jefferson and to each other. We must always act in the best interests of Jefferson when performing our duties. This includes avoiding conflicts of interest or even the appearance of a conflict of interest.

Conflicts of interest occur when our interests, or those of our family or close friends, divide our loyalties and influence, or appear to influence our ability to be objective and act in Jefferson’s best interest. We all must timely, accurately, and completely disclose relationships, interests, and activities that may create, or appear to create, a conflict of interest so that appropriate steps can be taken to reduce, manage, or eliminate them before they present increased risks to our reputation or Jefferson’s not-for-profit status.

Outside Employment

Outside activities, including serving on an external Board of Directors, must not compete or interfere with the best interests of Jefferson or its ability to pursue its mission, vision, and values. Therefore, these activities must be reviewed and approved according to Jefferson’s policies.

When we accept employment at Jefferson, we must, at the earliest possible time, disclose existing activities and relationships per policy to ensure that proper approvals are sought at the earliest possible time.



Click here to view the
[Institutional Conflicts of Interest Policy, 102.42](#)
[Conflicts of Interest Policy for Employees, 107.03](#)



A Conflict of Interest arises when our personal interests compromise, or appear to compromise, our judgment or ability to act in Jefferson’s best interest.

Some examples of a conflict of interest include:

- working for, or having an ownership interest in, a competitor or someone who does business with Jefferson;
- having a second job (including a board membership) that interferes with your work at Jefferson or using Jefferson assets for personal gain;
- having a family or close personal relationship with someone who directly or indirectly reports to you; or
- being involved in the selection process of a new employee, supplier or other business partner when the applicant is a family member or someone with whom you have a close personal relationship.



Gifts

We must remain impartial and objective in our business relationships. Since gifts may be used to obtain favor or to inappropriately influence, or appear to influence the recipient; we may not request, accept, or give gifts as part of our interactions with payers, beneficiaries, patients, customers, vendors, government officials or entities, or anyone with whom we conduct business.

Doing the right thing means we:

- review, understand and comply with our responsibilities under Jefferson's policies related to conflicts of interest;
- refrain from conduct that may lead the public or other Jefferson community members to conclude that we are using our position at Jefferson for our personal benefit or the benefit of our family members; and,
- fully disclose all personal relationships or interests that may affect or appear to affect clinical judgment, academic decisions, business transactions, or other decisions made on behalf of Jefferson before such decisions or actions are taken

If you are unsure whether a personal interest, relationship, or association creates an actual or perceived conflict of interest, you should contact your immediate supervisor, your Human Resources Business Partner, another leader at Jefferson, the Office of Legal Affairs, or your local Compliance Officer.



Family Members include spouses and domestic partners, parents and stepparents, grandparents, parents-in-law, all siblings, children and stepchildren, grandchildren, great-grandchildren, and the spouses of siblings, children, grandchildren, and great-grandchildren.



A Gift is anything of value given or received without compensation in return. Examples of gifts include, but are not limited to, cash or cash equivalents (i.e., gift cards), charitable contributions made in the name of a Jefferson community member or their family, or other items given without payment in return.



Click here to view the [Corporate Gift Policy, 127.02](#)



Resolve Conflicts of Interest Before They Happen

Work life. Home life. Sometimes they're separate. Sometimes they overlap.

Wherever we work—at home, in the office, or somewhere in between, we act responsibly and follow our Code of Conduct. The Code covers a lot of topics but let's focus on one, conflicts of interest. Your personal interests or Jefferson's interests? Is there a conflict?

Let's say you'd like to start a second job as a freelance web designer, and you use your Jefferson laptop and programs to work on projects for a little extra income. Would this be a conflict of interest? It may be okay to have a second job as a freelance web designer but using Jefferson's resources, including your work laptop, for your second job would not be appropriate.

We understand that employees may have a second job or devote time to personal interests. However, we must make sure to avoid blurring the lines between our work for Jefferson and our personal interests. Personal interests or outside employment must not interfere with our time or loyalty to Jefferson and must be disclosed and approved according to policy.

Unsure if you have a conflict? We're here to help you. Talk with your manager or contact another Jefferson resource if you think a conflict may arise. Often, we can resolve any conflicts before they happen. That way everyone's interests are protected.



ALERT LINE



We Prevent Fraud

We are committed to preventing fraud, abuse, and waste. Fraud and abuse can occur through filing false claims, using incorrect billing codes, providing unnecessary services, or any other scheme meant to obtain money by false pretenses. Waste occurs when resources are used inefficiently or services are overutilized, resulting in unnecessary costs.

We are responsible for complying with the federal False Claims Act, [the Deficit Reduction Act of 2005](#) and the Program Fraud Civil Remedies Act. These laws seek to prevent improper or fraudulent claims for payment by healthcare providers, like us, through Medicare, Medicaid, or other state or federal healthcare programs. The False Claims Act is not limited to claims for payment for medical services; it applies to claims for payment relating to any government program or contract. Jefferson or individual Jefferson community members may face monetary penalties for knowingly and willfully making false statements or claims in connection with a request for payment.



What does “knowingly” mean under the False Claims Act?



The definition of “knowingly” in the False Claims Act is broad—it includes actual knowledge, as well as deliberate ignorance and reckless disregard for the truth. We can subject ourselves or Jefferson to monetary penalties if we make a false claim, even if we do not have actual knowledge of the falsity of the claim for payment.



Click here to view the [Prevention of Fraud, Waste, and Abuse, 132.03](#)



Upholding our Reputation

We are responsible for ensuring that all payments Jefferson receives are accurate. If we become aware of an inaccurate payment, we must notify a responsible leader or related supervisor so that it can be corrected.

Doing the right thing means we:

- know and understand our responsibilities under the law and Jefferson policy;
- properly screen those Jefferson community members that will be participating in federal or state-funded healthcare or research programs to ensure their eligibility;
- never knowingly submit claims for payment based on false statements or representations; and
- take steps to prevent, detect, and report any incidences of fraud, abuse, and waste committed against Jefferson or the government.



I noticed the wrong billing code was used to charge for a patient's service that is covered by Medicare. I am sure it was a simple mistake, but the bill has already gone out for reimbursement. What should I do?



We are responsible to ensure all billing is accurate and that we never make false claims for reimbursement, even if it is just a mistake. If you become aware of an inaccurate billing, you should notify your supervisor so that it can be corrected.



Click here to view the [Federal/State Exclusion Program Policy, 132.04](#)



We Prohibit Corruption

We promote transparency and we comply with the laws and regulations that prohibit corruption of any kind, such as the U.S. Foreign Corrupt Practices Act and the Anti-Kickback Statute. These laws prohibit us or a third-party working on our behalf from offering or accepting bribes or kickbacks in any form.

Doing the right thing means we:

- provide patient referrals and admissions based solely on the patient's clinical needs and our ability to provide the needed services;
- accept students into our programs based solely on our established admission criteria;
- do not offer or give anything of value to anyone, in particular government officials, to influence business decisions; and,
- do not accept or solicit payments, kickbacks, or anything of value intended to influence a business decision or as a reward for patient referrals or student admission.



The Anti-Kickback Statute is a criminal statute that prohibits knowingly or willfully paying or offering to pay someone to make referrals for services, or to purchase, lease, order, recommend, or arrange for the purchase of services that may be covered by a federal health care program. The Anti-Kickback Statute likewise prohibits soliciting or receiving payment for any of the same activities. In short, the Anti-Kickback Statute prohibits the exchange, or offer to exchange, anything of value for patient referrals to Jefferson.



A **Bribe** is anything of value offered, promised or given to improperly influence the actions of another to obtain or retain business or an unfair business advantage. Bribes can come in many forms such as:

- cash or cash equivalents (such as gift cards)
- gifts, entertainment, hospitality, travel expenses
- business or employment opportunities
- political or charitable contributions
- favors or anything of value to the recipient



We Compete Fairly

We attract patients and students based on our reputation for excellence and never through unethical or illegal business practices. We comply with federal antitrust laws that are designed to promote fair competition in the market for products and services.

Doing the right thing means we:

- compete solely on the quality of the services we provide;
- never say anything false or misleading about ourselves or a competitor;
- never form agreements with competitors regarding pricing, market territories, customers, employee salaries, or products and services offered in the marketplace;
- never agree with competitors to boycott or exclusively use particular suppliers; and,
- seek guidance from the Office of Legal Affairs if we have questions or are unsure whether certain conduct violates federal antitrust laws.



The Stark Law is a set of rules that prohibits doctors from referring patients to certain services if the doctor or their immediate family members have a financial interest in the service provider. This means doctors can't send Medicare patients to places where they or their family members might financially benefit from the referral. The law also prevents Jefferson from billing Medicare for services provided through these prohibited referrals. Like the Anti-Kickback Statute, the Stark Law helps ensure that medical decisions are made in the best interest of patients, without financial conflicts of interest.



We Maintain Accurate Books and Records



Our commitment to acting with integrity and taking accountability extends to our books and records. We are each responsible for creating complete, accurate, and timely records related to our work. We rely upon the accuracy of these records to make the right decisions and to ensure the integrity of academic, clinical, payer, and financial information. We must understand and carefully follow all applicable rules and regulations related to payment for healthcare-related services.

Those of us involved in patient care, clinical trials, or activities such as coding and billing, must understand and carefully follow all applicable rules and regulations related to payment for healthcare-related services.

Doing the right thing means we:

- maintain complete, accurate, and timely books and records related to our areas of responsibility;
- must ensure accurate and timely billing practices that comply with our policies and all applicable laws and regulations;
- manage the storage, retention, and destruction of records under Jefferson's record retention policies;
- cooperate fully with internal or external auditors, investigators, or regulators; and
- report any actual or suspected errors or irregularities in records to the appropriate Jefferson officials for review.



Q

If I do not work in finance or accounting, do I need to be concerned about the accuracy of our books and records?

A

Yes. Beyond financial accounting, a record can be anything that documents an activity or decision such as information in a patient's chart or a student's performance, billing information, timecards or expense reports. We all have a responsibility to make sure that the information we provide in any Jefferson record is complete, accurate, timely and understandable.



Q

I was recently notified by the Office of Legal Affairs that I will need to participate in a government inquiry, what should I know?

A

If we are involved in an official government inquiry, investigation, or other legal proceeding, we must act lawfully and:

- do not alter, destroy, conceal, or falsify documents related to an investigation;
- do not attempt to influence the decisions of a government representative; and
- follow the direction of Jefferson's legal counsel when handling documents (including electronic records) in our custody or control relating to a matter under review.



We Safeguard Jefferson Assets

We each have a responsibility to protect Jefferson assets from loss, damage, theft, waste and misuse. Jefferson assets include things like computers, software and programs, telephones, funds, buildings, and other physical property as well as intangible assets, such as data, confidential information, intellectual property, brands and logos.

Sharing confidential information with people outside the Jefferson community could damage our reputation or violate the law. Even within the Jefferson community, we only share confidential information with others who have a business need to know. Some of us have access to confidential information about a patient, a student or business partner. If so, we should exercise the same care to protect that information.

Protecting information about Jefferson, our patients, our students, and our business partners that is held on our computer systems, portable electronic devices, laptops, phones and other technology requires us to take appropriate security measures to prevent loss due to unauthorized access.

Doing the right thing means we:

- use Jefferson assets only for business purposes and never for personal gain or activities that violate the law or Jefferson policies;
- secure all confidential information and only share it with those who have a business need to know; and,
- use strong confidential passwords, taking appropriate caution when accessing the internet, installing only authorized software, being alert for phishing or other potential cyber-attacks, and promptly reporting any unusual or suspicious activities.



Confidential Information is information about Jefferson, our affiliates, employees, patients, students or other business partners that is not known to the public.



Intellectual Property consists of commercially valuable intangible assets, such as patents, copyrights, trademarks, inventions and trade secrets.



Q

I know Jefferson assets should only be used for business purposes, but does that mean I cannot check my personal email on my Jefferson laptop?

A

Limited personal use of assets such as telephones, computers and printers may be permitted by your manager as long as it does not interfere with your job responsibilities and does not violate any law or Jefferson policy. For example, never use Jefferson assets to download or send material that could be considered offensive to others.



Q

I work from home and sometimes, to get a change of scenery, I work from my local coffee shop that has free Wi-Fi. A colleague told me this could create a security risk for Jefferson. Is that true?

A

Yes, using an unsecured Wi-Fi network could expose Jefferson to viruses or unauthorized access to our systems or data. It is important we only use approved, secured means, including multi-factor authentication, to access Jefferson networks or data when working remotely.



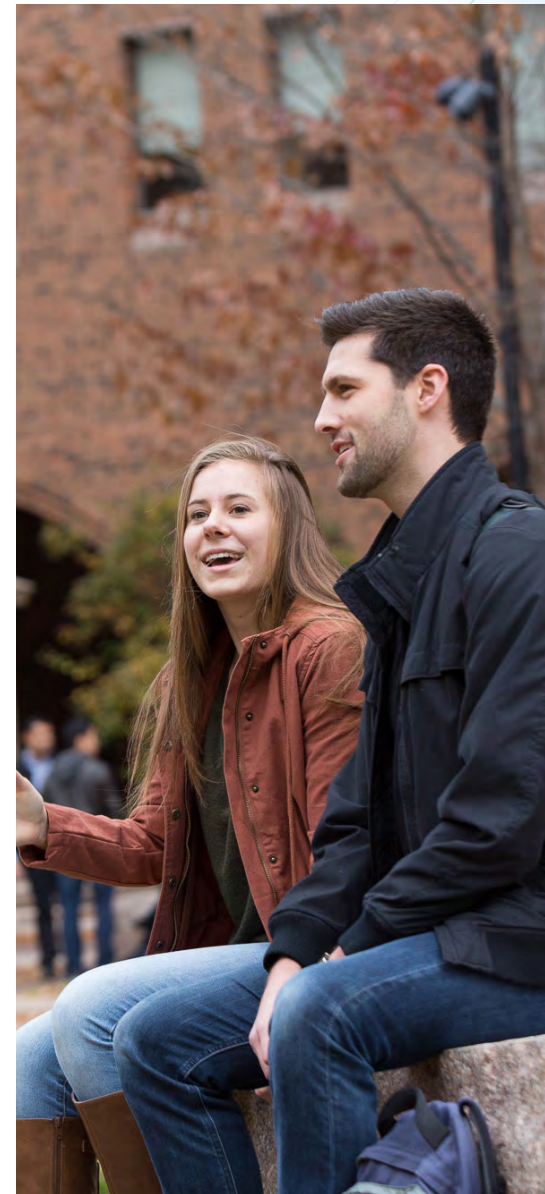
We are Responsible in our Communications

It is important to remember that any statements we make may become public. To line our conduct up with Jefferson's values, we must always be respectful, factual, and professional in our face-to-face, email, telephone, written, and other forms of communication. Keep in mind that there should be no expectation of privacy when you utilize Jefferson's systems and tools to share information. All communications and information created or stored on Jefferson's systems are Jefferson property and subject to monitoring.

Social Media

Social media provides a variety of platforms that can be used effectively by designated spokespersons to communicate about Jefferson. All social media activity on behalf of Jefferson must be coordinated through the office of the Chief Growth and Marketing Officer. If we choose to use social media, we must:

- be clear that we are expressing our own opinions and statements and our statements and opinions do not represent Jefferson;
- ensure that our personal social media activity does not reflect poorly on Jefferson's reputation or the reputation of its employees, business partners, or other related entities; and
- never disclose confidential information in social media posts or other communications.



External Communications

Members of the media, the government, and others in the public may contact us to learn more about Jefferson. To ensure they receive information that is accurate and consistent, only individuals who have been designated to speak on Jefferson's behalf may do so. All media requests must be directed to the office of the Chief Growth and Marketing Officer. We may not interact directly with the media on behalf of Jefferson without express permission from that office.

If we receive an inquiry from a governmental agency or judicial authority requesting information, we must immediately contact our local Office of Legal Affairs to coordinate and ensure a timely and appropriate response.

If we are speaking publicly in a professional setting or in a scenario that may reasonably be construed as involving Jefferson's business, we must be sure to distinguish our personal views from official statements and actions taken on behalf of Jefferson.

Doing the right thing means we:

- communicate in a way that is respectful and professional, never in a way that would be offensive or violate our Code;
- follow the guidelines for responsible use of social media and protection of confidential information;
- never make unauthorized or derogatory remarks about Jefferson, any of its entities or other Jefferson community members to others; and,
- refer all external inquiries about Jefferson to designated spokespersons or departments



Q

I am proud to be a Jefferson employee. I am very active on social media and have a large number of followers from both inside and outside the Jefferson community. My profile includes pictures of me in my Jefferson office and I proudly state that I am a leader at Jefferson in my profile description. I post about things happening at Jefferson and sometimes add my opinions about current events and politics to my posts. Is that acceptable under the Code?

A

Jefferson's Social Media policies are designed to help employees use social media responsibly. Jefferson's policies will help us understand how to avoid potential problems associated with personal social media posts. Policies outline who can and cannot represent the brand online, the general types of content that may be shared and the kinds of content, posts, and comments employees should avoid.

We should devote our attention to Jefferson-related responsibilities while at work; therefore, personal social media use during work hours is important to manage according to relevant policies. Remember, even if you intend to keep social media posts private, someone may share the post so employees must be conscious of the risks associated with posting on their personal social media accounts and seek help before they decide to post.



Q

One of my co-workers sends emails or text messages with comments about students that are not respectful, and they sometimes use language that could be offensive to others. I know they are just blowing off steam, but I don't think it's appropriate. What should I do?

A

The messages you describe likely violate one or more of Jefferson's policies. Please contact your supervisor, a Human Resources Business Partner, or another University leader to share the messages you received and discuss your concerns. You may also remind your co-worker about the importance of being respectful and professional in all of their communications because it's the right thing to do and because the messages they are sending from their Jefferson email could become public. You do not need to undertake an investigation or attempt to discipline your co-worker. Jefferson's leaders have been trained to address potential policy violations and they can initiate appropriate action once you share with them, what you know about the situation.



We Do Not Trade on Inside Information



During the course of our work, we may have access to material inside information about publicly traded companies. Inside information is information that is not yet known to the public (inside) and would be considered important to an investor when making a decision to buy or sell stock (material). Examples of this information may include potential major contracts, possible mergers or acquisitions, new products, leadership changes or financial information that has not yet been disclosed to the public.

If you are not sure whether certain information would be considered material inside information or if you have any questions about the laws and regulations that govern securities trading, ask the Office of Legal Affairs for guidance before taking any action.

Doing the right thing means we:

- comply with all insider trading laws that prevent buying, selling, or retaining stocks, bonds, or securities based on inside information; and
- must not provide inside information or tips to anyone based on such information





We Respect Our Community



We Respect the Environment

We understand that our communities are part of the natural environment upon which we all depend. We respect the environment by striving to reduce our impact on it.

Doing the right thing means we:

- comply with all applicable environmental laws and regulations;
- use our resources efficiently; and,
- look for ways to continuously improve our efforts.



ALERT LINE 

We are Active in our Communities

In our effort to improve lives, we engage with people and organizations through Jefferson-sponsored outreach programs focused on the health and well-being of those in our neighborhoods and communities we serve. We do not, as an organization, participate in the political process or make contributions to any political party or specific candidate.

Individual Political Activity

We respect the right of Jefferson's community members to be individually active in the political process or in charitable causes that are personally meaningful to them. If we choose to individually participate in personal charitable or political activities, we must:

- do it on our own time, with our own funds and resources, and be clear that we are acting as an individual and do not represent Jefferson;
- not use Jefferson's resources, including funds, time, property, equipment, or personnel for these personal activities; and
- not pressure or attempt to influence other Jefferson community members to support any candidate or cause.



Q

I am working on a local political campaign. Is it okay to send information about the candidate to other Jefferson community members using my Jefferson laptop and email address?

A

No. It is never appropriate to use Jefferson's funds or resources of any kind to contribute to a specific political candidate or political campaign. We encourage you to be active in your community; however, it is not appropriate to use your Jefferson email address or Jefferson resources to support our personal political activities. When personally participating in political or charitable activities, we must do it on our own time, with our own resources, and be clear we are not representing Jefferson.



Q

My manager recently accepted a seat on the Board of Trustees of a not-for-profit organization that has been a recipient of my family's volunteer time and donations for years. The organization's giving day is approaching soon and I mentioned to a co-worker that I planned to make a larger contribution this year. My co-worker immediately said: "You are really trying to kiss up to the boss huh?" I am worried that my donation may be seen as an attempt to influence my manager but this is an organization I care about and I want to support it. What can I do?

A

Giving to a not-for-profit organization of your choice is generally your decision to make. As long as your supervisor did not make statements or take actions that led you to believe the donation is a requirement of your continued employment or is tied to an employment benefit, Jefferson's policies do not require you to stop giving to a not-for-profit organization because a leader from Jefferson serves as a member of its Board of Trustees. To learn more about requests for donations, please check Jefferson's policies related to solicitation.





Key Contacts and Resources



The Enterprise Compliance Team



The Enterprise Compliance Team is available to support your efforts to Do the Right Thing. If you have any questions about the content in this Code, or you would like to raise a concern, you may contact the Enterprise Compliance Team by calling **COMPLIANCE 411** at **844-MY-1-CODE (844-691-2633)**, or by sending an email to **compliancequestions@jefferson.edu**. We are here to help, so please visit us on **ONE** to gain access to resources, learn about educational events, and share suggestions with us.

The Jefferson Alert Line

The Jefferson Alert Line is hosted by a third-party provider and can be used to ask questions or raise concerns in a confidential and anonymous manner.

You may access the Alert Line 24 hours a day, seven days a week to ask questions or raise concerns:

- on the internet at <http://jefferson.ethicspoint.com>
- or by telephone at **833-ONE-CODE (833-663-2633)**



Office of Campus Safety and Security



Safety is a shared responsibility at Jefferson. The Office of Public Safety and Security serves as an integral partner and resource for students, employees, patients, faculty, visitors, and communities in which Jefferson operates certain aspects of its business. Members of the Office of Campus Safety and Security leverage their expertise, tools, and technology to keep you informed and foster a safety-focused culture designed to prioritize personal safety across the Jefferson Enterprise.

- Please familiarize yourself with the services and resources provided by Jefferson’s Office of Public Safety and Security.
- If you have concerns about your personal safety, you may contact the Office of Campus Safety & Security at:
- Hospital Security: **215-955-8888** or **5-8888** (from inside the hospital)
- Thomas Jefferson University East Falls: **215-951-2999** or using anyone of our campus-wide emergency blue light phones.
- Thomas Jefferson University Anonymous Tip Line: **215-955-5678**

Company Policies

Detailed information about topics covered under Jefferson’s Code of Conduct and Ethical Behavior can be found by accessing Jefferson’s official enterprise policy site at <https://jeffersonuniversityhospital.policystat.com>.



ALERT LINE



Administration

Jefferson may modify its Code of Conduct and Ethical Behavior from time to time as necessary to respond to changing laws, regulations, and evolving organizational needs. Significant changes to the Code will be shared with the Jefferson community and will be presented to the organization's parent Board of Trustees as required by governance processes and procedures.

Acknowledgment Process

At least annually, we ask all Jefferson community members to acknowledge that they received and reviewed the Code of Conduct, confirm they understand that the Code represents Jefferson's official standards of conduct, and agree to abide by it. Meeting all Code of Conduct education and acknowledgment requirements is a prerequisite to remaining in good standing at Jefferson.

By acknowledging the Code, we are confirming our understanding that failure to abide by its terms and standards of conduct may result in disciplinary action, up to and including termination of employment and any employment contract that may exist. New and existing colleagues are required to read and acknowledge the Code as a condition of employment, and all are required to participate in training designed to reinforce awareness and understanding of the Code's requirements. Support of the Code and participation in related educational programs may be considered in decisions regarding hiring, promotion, and performance evaluation for all Jefferson community members.



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Jefferson

HOME OF SIDNEY KIMMEL MEDICAL COLLEGE

