



Code of Ethics and Business Conduct

Maintaining the Highest Standards of Ethical Excellence

Letter from the President

SUNY Downstate Medical Center (DMC) has a long-standing reputation for lawful and ethical behavior, a reputation which you and your fellow employees and faculty members have earned over the years. This is more than a source of pride for us; it is one of our greatest assets. In an increasingly complex health care environment, we will maintain our leadership in patient care, medical education and research only if we continue to merit the trust of our patients, the community, government regulators and one another.

DMC has a Compliance Program, including a Compliance and Audit Oversight Committee, which includes representation from the Clinical Practice Management Plan/University Physicians of Brooklyn, the College of Medicine, the University Hospital of Brooklyn and Center-wide Administration. The Compliance Program ensures that SUNY Downstate Medical Center maintains its commitment to legal and ethical conduct by all employees and faculty. Renee Poncet is the Vice President for Compliance and Audit Services, with responsibility for overseeing this Program.

This is your personal copy of SUNY Downstate Medical Center's Code of Ethics and Business Conduct, which reaffirms the principles that have guided this institution since its founding in 1948. It sets forth our general standards of legal and ethical conduct. The Code is supplemented by a more detailed Compliance Program Manual and by the SUNY Downstate Medical Center policies and procedures pertaining to specific areas.

I expect all SUNY Downstate Medical Center employees, including physician staff, and voluntary physicians to uphold these legal and ethical principles without exception. To do so, we all must read this Code carefully and apply it to our work. If you have any questions about how our principles, standards or policies apply, seek answers from your supervisor, the Vice President for Compliance and Audit Services or other appropriate individuals in the institution.

Please keep in mind that violations of legal or ethical requirements jeopardize the welfare of the entire DMC campus, including the Colleges of Nursing, Medicine and Health Related Professions, the Research Foundation, Clinical Practice Management Plan/University Physicians of Brooklyn, University Hospital of Brooklyn and Centerwide Administration; its employees, patients and the communities it serves. Remember, too, that standards of conduct mean little without personal commitment. Ultimately, the responsibility for ethical behavior - and thus for DMC's reputation - rests in our hands.

John C. La Rosa, MD, FACP
President

SUNY DMC Code of Conduct Guidelines

SUNY Downstate Medical Center expects all employees, faculty and members of the College Council to conduct themselves in accordance with all legal requirements and State, University and institutional policies that apply to their position. The basic guidelines outlined below must be adhered to by each member of our faculty and staff.

1. Compliance with Laws and Regulations

Downstate Medical Center will strive to ensure all activity by or on behalf of the organization is in compliance with applicable laws and regulations.

2. Adherence to Ethical Standards

In furtherance of Downstate Medical Center's commitment to the highest standards of business ethics and integrity, employees will accurately and honestly represent Downstate Medical Center and will not engage in any activity intended to defraud any individual or organization of money, property or honest services.

3. Patient Care

All patients are entitled to equal access to care, to be treated with care and respect and to the protection of their privacy and the confidentiality of their medical records.

4. Non-Discrimination

Downstate Medical Center is committed to providing an academic workplace and patient care setting which treats all individuals fairly and respectfully. Discrimination or harassment on the basis of race, color, religion, gender, nationality, age disability, sexual orientation or veteran's status is strictly prohibited.

5. Confidentiality

Downstate Medical Center employees shall maintain the confidentiality of patient and other confidential information in accordance with applicable legal and ethical standards.

6. Record Accuracy and Retention

All Downstate Medical Center records, documents and reports must be accurate, complete and in compliance with Downstate Medical Center, accreditation and governmental requirements. Additionally, all records shall be retained in accordance with State and Federal record retention requirements. All bills for Downstate Medical Center services must be supported by actual services provided and by required documentation. Institutional records or documents of any kind should not be removed from the premises unless approved in conjunction with policies and procedures.

7. Protection of Assets

All employees will strive to preserve and protect Downstate Medical Center's assets by making prudent and effective use of its resources and properly and accurately reporting its financial condition.

8. Avoidance of Conflict of Interest

Executives, managers, physicians, other employees, and volunteer physicians and committee members owe a duty of undivided and unqualified loyalty to the Downstate Medical Center. Persons holding such positions may not use their positions to profit personally or to assist others in profiting in any way at the expense of the organization. We must avoid conduct which has even the appearance of conflict between our personal interests and those of the Downstate Medical Center.

9. Business Relationships

Business transactions with vendors, contractors and other third parties shall be transacted appropriately, without offers, solicitation or acceptance of gifts and favors or other improper inducements in exchange for influence or assistance in a transaction. We must conduct our business activities on the basis of fair competitive practices. All purchases of services and supplies must be from qualified and reliable sources and be based upon objective factors, consistent with institutional policies and procedures.

10. Academic / Research Integrity

Downstate Medical Center is dedicated to upholding the legal and ethical standards applicable to medical education and research, including Federal and State requirements relating to scientific misconduct, the protection of human subjects in research and the use of animals in research.

11. Environmental Laws

We must comply fully with all environmental laws and regulations. All hazardous materials and infectious wastes must be stored, handled and disposed of in full compliance with all laws, regulations and institutional policies. Unsafe storage or inappropriate release of such materials into the environment must be promptly reported. We will work cooperatively with the appropriate authorities to remedy any environmental contamination for which Downstate Medical Center may be responsible.

12. Occupational Safety

We must abide by all laws and regulations regarding occupational safety.

13. Maintenance of a Drug and Alcohol Free Workplace

The use, sale, purchase, transfer, possession or presence in one's system of illegal drugs is strictly prohibited. Similarly, the use, sale, purchase, transfer, possession or presence in one's system of alcoholic beverages while on duty is prohibited.

Reporting of Violations

Employees and faculty are required to come forward with any information regarding an actual or possible violation of this Code or DMC policy and cooperate fully in the investigation of any alleged violation.

Reports should be made either in person, by telephone or in writing to any of the following:

1. Your Supervisor or responsible Vice-President
2. Office of Compliance & Audit Services: 270-4033, Box #1248
3. SUNY DMC University Counsel: 270-4628, Box #1258
4. Human Resources Senior Administration: 270-1191/ 3019, Box #1224
5. HIPAA Privacy Officer: 270-7470, Box #1248
6. Information Security Officer: 270-4454, Box #17
7. Patient Relations: 270-1111, Box #23
8. Regulatory Affairs: 270-1136, Box #1254
9. Office of Opportunity & Diversity: 270-1738, Box #1220
10. Office of Scientific Affairs: 270-2680, Box #129
11. Facilities Management & Development/ Environmental Safety: 270-1216, Box #13
12. University Police: 270-2626, Box #1201

In addition, DMC's Compliance Line is available to all employees and faculty to discuss concerns about possible violations of the law or Downstate Medical Center policy anonymously. Reports can be made in the following manner:

- **Call: 877-349-SUNY (7869)**
- **Web- report: Click on the "Compliance Line" link on the main Downstate homepage at www.downstate.edu.**

There shall be no reprisals for good faith reporting of actual or possible violations of the Code. However, if the helpline is used improperly (ie; to harass) there may be disciplinary action taken against the employee. DMC will endeavor to keep the identity of anyone reporting a violation confidential to the extent permitted by law, unless doing so prevents DMC from fully and effectively investigating an alleged violation.

Discipline for Violations

DMC will take appropriate disciplinary action, including dismissal, when appropriate, against any employee who violates any legal requirements or institutional policies, including anyone who fails to report violations or retaliates against any individual for reporting in good faith a possible violation.

Questions Regarding the Code

This Code is designed to remind you of the general legal requirements and institutional policies that you must adhere to as an employee of DMC. It is not a substitute for existing and future policies of DMC.

A copy of the Compliance Program Manual is available, upon request, and can be accessed at the website: www.downstate.edu/compliance.

If you have any questions regarding the Code, you may direct them to your supervisor, the VP for Compliance & Audit Services or University Counsel.