

CODE OF ETHICS | 2017

and Professional Conduct




H. Lee Moffitt Cancer Center
& Research Institute

Letter from the President and CEO



At the very core of Moffitt Cancer Center's Patient First initiative is the concept that each of us plays an important role in making sure that we are able to provide the best patient care possible.

Each of us is accountable, and to ensure we conduct our business according to the highest standards, we established the Code of Ethics and Professional Conduct to guide our decision-making.

While this information is designed to provide overall guidance, it does not address every situation. We are committed to encouraging and empowering our team members to make good decisions, and we want you to feel comfortable about speaking up when the actions of others put us in jeopardy or something just doesn't seem "right." It is at that moment when your commitment to our Code of Ethics and Professional Conduct is most important.

If you have any questions or concerns that any part of our Code is not being met, please contact your immediate supervisor or Moffitt's Compliance Office. Your involvement and vigilance are important.

Thank you for your adherence to these values and standards.

Alan F. List, M.D.

A handwritten signature in black ink that reads "Alan List". The signature is stylized and cursive.

President and CEO
Moffitt Cancer Center

Leadership Responsibilities

While all members of the Cancer Center's [workforce](#) are expected to follow the Code of Ethics and Professional Conduct (the CODE), we expect our leadership to set an example and to be in every respect, a role model. Supervisory and management staff must endeavor to ensure that all those who report to them have sufficient information to comply with the law, regulations and policies as well as the resources to resolve ethical dilemmas. They must help create a culture that promotes the highest standards of ethics and compliance and encourage everyone to raise concerns when they arise. Ethical and compliant behavior must never be compromised in the pursuit of business objectives.

Code of Ethics and Professional Conduct

- Leadership as well as the Cancer Center's workforce will provide services and conduct business without discrimination.
- All workforce members must abide by the standards and principles in the CODE.
- All workforce members have an obligation to speak up when in doubt as to the proper course of conduct or when possible violations of the law or CODE are identified.
- Any workforce member who raises concerns will be received openly and courteously without fear of intimidation or retaliation.
- Retaliation for reporting is prohibited.

Reporting Compliance Issues and Concerns

The CODE is designed to provide guidance in determining whether there may be a problem that needs to be discussed or addressed. In addition to your chain of command, the Cancer Center provides resources for reporting your questions or concerns:

- Compliance Hotline [1-844-760-5840](tel:1-844-760-5840)
- Compliance Reporting Website at: mycompliancereport.com/brand/moffitt
- Corporate Compliance Office at [\(813\) 745-1869](tel:813-745-1869)

Confidential and Anonymous Reporting

1-844-760-5840

mycompliancereport.com/brand/moffitt

The Compliance Hotline and Web Reporting Site are available to you twenty-four (24) hours a day, seven (7) days a week. Whether you want to remain anonymous or provide your name, we welcome your call.

Anyone making a report is assured that it will be treated as confidential and will only be shared on a need-to-know basis. The Cancer Center will ensure that all reported concerns are thoroughly investigated and that appropriate action will be taken.

The CODE addresses the following standards:

1. Provide high quality care and services.
2. Conduct research ethically.
3. Promote fair employment practices and open communication.
4. Obey the law in all business practices.
5. Protect and safeguard confidential information.
6. Code, bill and collect in an ethical and legal manner.
7. Avoid conflicts of interest.
8. Safeguard assets and property.
9. Maintain a safe environment.
10. Promote a culture of respect.

STANDARD 1

Provide High Quality Care and Services

We are committed to providing high quality care and services to our patients and their families, visitors, and the community. Such care will be safe, effective, patient-centered, timely, efficient, equitable, and linguistically and culturally competent.

We / I Shall...

- Promote a culture of safety in all that we do.
- Listen to and honor patient and family views and choices to understand the needs of our patients, families and visitors. Be patient-centered by providing care that is respectful, culturally and linguistically competent and responsive to patients ensuring that patient preferences guide all clinical decisions.
- Provide indigent care when medically appropriate.
- Promptly report actual or potential errors so that corrective action can be taken.
- Promote a "Fair and Just Culture" that does not tolerate intentional disregard of apparent risk, gross misconduct, or repetitive rule/policy violations as they endanger patients and co-workers.
- Refrain from giving or receiving gifts, gratuities, or other items of value to/from patients.

STANDARD 2

Conduct Research Ethically

Basic, clinical, translational, and population science research are central to our Mission. We are committed to following the principles of honesty and integrity in designing, conducting, and reporting research.

We / I Shall...

- Comply with regulations on **Human Subject Protection** in the **care** of all human subjects involved in research.
- Prohibit scientific misconduct, including the **fabrication** or **falsification** of data, the negligent collection or analysis of data, and **plagiarism**.
- Accurately and promptly report financial interests in accordance with the Cancer Center's conflicts of interest in research policy to ensure the objectivity of the science and the protection of all participants in research.
- Respect the individual's right to refuse, agree to, or withdraw from participation on a study.
- Ensure fair and equal access to research protocols without discrimination while weighing the potential benefits of the research against any vulnerability or risks.
- Ensure responsible scientific and ethical review and approval of every research proposal, including the reporting of studies in accordance with sponsor guidelines.
- Protect the confidentiality of any research data and intellectual property that I/we have access to during the course of my job duties.
- Comply with ethical policies and humane practices on the care and use of animals in compliance with all applicable state and federal regulations.



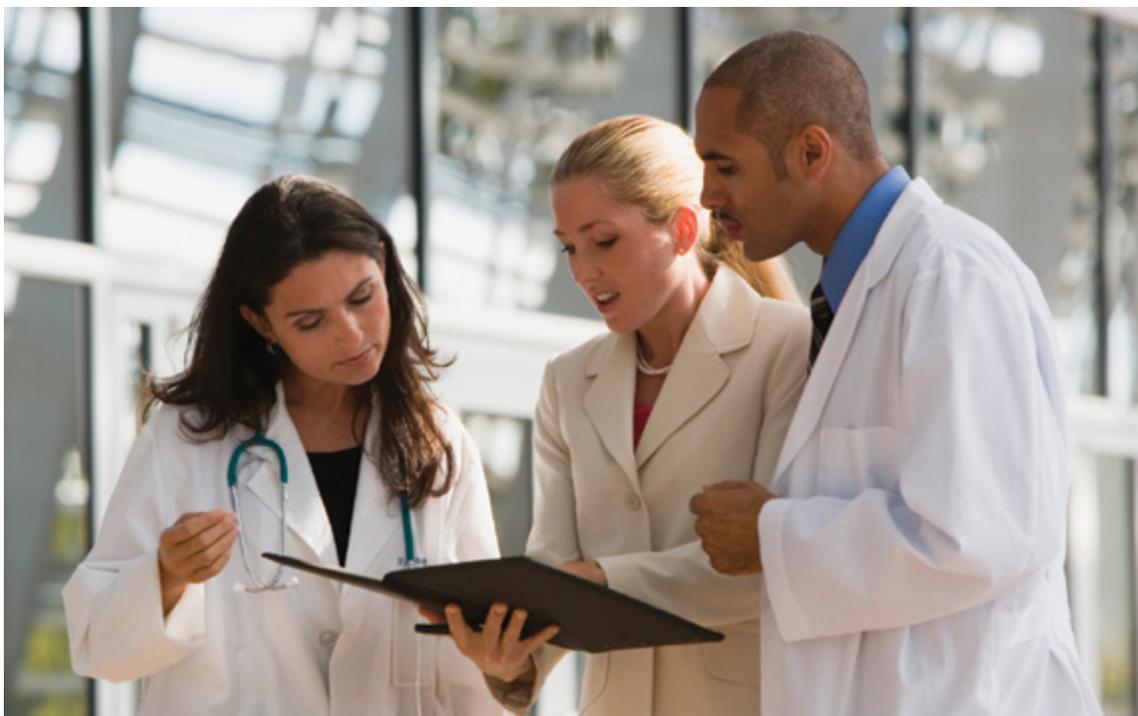
STANDARD 3

Promote Fair Employment Practices and Open Communication

*We are committed to providing a work environment throughout the organization that promotes fair **treatment** and complies with laws in all matters relating to employment.*

We / I Shall...

- Recruit, hire, train, promote, compensate and retain on the basis of personal **competence** and potential for advancement without regard for race, color, religion, sex, sexual orientation, gender identity or expression, national origin, age, marital status, physical and mental ability, genetic information or veteran's status, as well as other classifications protected by law.
- Treat all faculty, staff, and **workforce** members fairly, equitably and consistently.
- Support an open door policy by maintaining an ongoing and open communication of opinions, concerns, and problems without fear of retaliation.
- Verify credentials for qualifications and conduct appropriate background checks on all potential and current faculty, employees, volunteers, business partners and organizations to which we refer our patients.
- Prohibit retaliation or retribution for good faith reporting of suspected wrong-doing or participation in investigations related to possible wrong-doing.



STANDARD 4

Obey the Law in All Business Practices

We will conduct our business in compliance with the laws, regulations and standards that apply to the business of the Cancer Center, the reporting of our financial position, internal controls, and corporate oversight.

We / I Shall...

- Pursue only those business opportunities that are legal, ethical and consistent with the Cancer Center's tax-exempt purpose and values.
- Not engage in any illegal business practices intended to influence the decisions of any external representative, including bribery, kick-backs or payoffs.
- Communicate, market, and advertise truthfully and accurately.
- Ensure that every **contract** payment or other benefit paid to physicians, providers or vendors is for specifically defined services and goods and at fair market value.
- Maintain all Cancer Center records, both patient and business related, accurately and truthfully.
- Never change, create, conceal, destroy or add to a record or document in a way that is not truthful or make misleading or false statements in response to any governmental or official inquiry.
- Retain, manage, and dispose of paper and electronic records in accordance with State of Florida regulations and Cancer Center policies.
- Record all financial **transactions** accurately, completely, and timely.
- Act in good faith in all **contractual** negotiations and business relationships.
- Comply with all **copyright** laws for materials such as software, webpages, and printed and audiovisual works.
- Abide by all treaties, laws and regulations that apply to the Cancer Center's international and foreign transactions, including the export of goods, software, and technical data in accordance with federal export control laws.
- Report my time and effort accurately in support of teaching, research, patient care, and other work related activities.
- Ensure that all clinical duties are performed by properly trained and/or licensed/**credentialed** individuals. Keep our licenses and credentials up to date.
- Agree to participate in and cooperate with initial and on-going screenings of workforce members, other individuals, and vendors against government sanction and exclusion lists.
- Notify Human Resources of any conviction or action by a licensing or regulatory authority impacting my duties and responsibilities.

STANDARD 5

Protect and Safeguard Confidential Information

We will ensure the responsible use and disclosure of patient, visitor, workforce member, faculty, business, and other confidential information.

We / I Shall...

- Respect the confidential nature of Cancer Center activities and patient information by accessing, releasing and discussing such activities and information according to applicable **treatment**, **payment**, **healthcare** operations and **research** purposes.
- Access patient records, whether written or electronic, only when the information in the record is needed to carry out my job responsibilities. Limit the use and sharing of patient information to the minimum necessary or smallest amount needed.
- Treat all patient information as confidential and safeguard its security and privacy, including taking steps to reduce the collection, use and disclosure of social security numbers.
- Obtain valid authorization and **consent**, where necessary, to use and disclose patient information.
- Refrain from discussing or displaying restricted or confidential information in public areas.
- Protect information systems from unauthorized access by taking appropriate security measures. Never provide or share information system passwords with others.

STANDARD 6

Code, Bill and Collect in an Ethical and Legal Manner

We are committed to integrity in our charging, coding, billing, and collection practices.

We / I Shall...

- Use codes that accurately describe the services that were ordered and provided to patients and ensure that all bills accurately reflect the services and are properly supported by documentation in the medical record.
- Ensure all bills are submitted for payment or reimbursement in compliance with federal and state laws.
- Promptly correct any billing errors and timely refund any overpayments identified.
- Ensure that the patient or third-party payors are not billed for the costs of research-related tests, procedures and treatments that are paid by a study sponsor.

STANDARD 7

Avoid Conflicts of Interest

We will conduct ourselves with integrity, honesty, and fairness to avoid any conflict, or appearance of conflict, between personal interests and the interests of the Cancer Center.

We / I Shall...

- Graciously decline any offers of money or gifts from patients, their families, visitors, vendors and others, which are not intended for the benefit of the Cancer Center Foundation.
- Not provide, or appear to provide **payment** or other benefits for referrals of patients.
- Decline any gift or gratuity, including cash or cash equivalents, offered by pharmaceutical, biotechnology, and medical device companies or their representatives regardless of the amount or nature of the item.
- Ensure that interactions with suppliers and vendors, and their representatives meet the highest business and ethical standards and protect the privacy of our patients. Lavish, extravagant gifts and meals are not acceptable.
- Ensure that actual or potential conflicts of interest and conflicts of commitment in relation to activities are appropriately managed, reduced or eliminated.
- Ensure that no individual is in a position to affect the work, pay or promotion of his/her close relative unless approved in accordance with Cancer Center policy.
- Ensure that any **proprietary** or **non-public** information acquired as a result of a relationship with the Cancer Center is not used for the gain of another business, personal gain, or insider trading.
- Inform a supervisor of any situation, which could create the potential for a **conflict** of interest.
- Conduct all fundraising ethically within the Cancer Center's guidelines and in support of the Cancer Center's Mission.
- Always make purchasing decisions based on objective decision making, of minority and women suppliers, and taking into consideration the supplier's ability to meet the needs of the Cancer Center.
- Avoid soliciting for anything, individually or as a group, on behalf of the Cancer Center. Any solicitation activity should be conducted within the context of the Foundation in accordance with Cancer Center policy.
- Ensure that continuing medical education (CME) or other similar courses are conducted with the highest integrity and scientific objectivity and in the absence of bias.

STANDARD 8

Safeguard Resources and Property

We will use our resources wisely and will be accountable for their proper use.

We / I Shall...

- Be responsible and accountable for the proper use of funds.
- Acquire, preserve, and dispose of the Cancer Center's assets, property, facilities, equipment and supplies in accordance with the Cancer Center's policies.
- Use time at work responsibly for work-related activities.
- Use electronic communications (e.g., E-mail, Internet) responsibly and in accordance with the Cancer Center's policies.
- Remember that my signature, whether written, stamped, electronic or through a user identification, is representation of myself. I will not use another individual's signature.
- Avoid engaging in any political campaign activity in the name of or on behalf of the Cancer Center.

STANDARD 9

Maintain a Safe Environment

*We are committed to providing a safe environment for our faculty, **workforce**, patients, and visitors.*

We / I Shall...

- Not work under the influence of alcohol, illegal drugs, or substances which may impair the ability to perform a job.
- Not make threats of violence or engage in acts of violence.
- Use good judgment and safe practices when working with or lifting patients, equipment, property and medical products.
- Use appropriate Personal Protection Equipment and care in the handling, use and disposal of medical/ research waste or other hazardous materials.
- Eliminate or minimize any hazards to the health and safety of faculty, workforce, patients, and visitors.
- Wear proper identification at all times while on Cancer Center premises, whether faculty, workforce, volunteer, student or vendor. Know who is in my work area and report unauthorized persons immediately to my supervisor, director or Security.
- Immediately report to a supervisor and/or Security any practice, condition, existing or potential hazard, or action that may violate any rule, regulation or safety standard.

STANDARD 10

Promote a Culture of Respect

We are committed to promoting a culture of respect by using the following acceptable behaviors.

We / I Shall...

- Treat individuals with dignity, respect, and courtesy at all times while valuing individuals for their roles and varied experiences.
- Act with respect and consideration for individuals' differences and similarities.
- Maintain an **inclusive** culture at work that is free of **harassment**, **disruption** or hostility.
- Communicate honestly and directly with others in a timely, professional, constructive, and respectful manner.
- Support a workplace free of disruptive and inappropriate behavior to ensure safe delivery of patient and family centered care and to allow for a creative and productive research environment.
- Promote cultural and linguistic **competence**, diversity and inclusion in the workplace, the care of patients, the conduct of research, and all other Cancer Center activities.



Mission Statement

The mission of H. Lee Moffitt Cancer Center & Research Institute is to contribute to the prevention and cure of cancer.

Vision Statement

Our vision is to transform cancer care through service, science and partnership.

Value Statement

Scientific, educational, and patient care excellence

Unity in pursuit of our mission

Creativity

Compassion for our patients and their families

Employees, volunteers, and faculty are our most prized resource

Stewardship

Social responsibility and ethics of the highest standard

