



Code of Conduct

Introduction

The UC Davis Health Code of Conduct establishes and explains UC Davis Health's expectations for acting with integrity and conducting university business in a fair and consistent manner. UC Davis Health is committed to the highest ethical, legal, and professional standards to fulfill our mission of transforming lives and communities by providing unparalleled care grounded in equity across California. UC Davis Health's ability to further its mission depends on workforce community members supporting one another in building a culture of compliance and providing quality patient care. Therefore, we are committed to the ethical and compassionate treatment of patients and to complying with all laws, regulations and University standards.

What is the Code of Conduct?

The UC Davis Health Code of Conduct is comprised of 14 standards, each of which addresses a possible compliance risk. Each standard provides information on appropriate conduct to follow and guidance on addressing potential concerns.

In addition to the UC Davis Health Code of Conduct, the University of California (UC, University) has also adopted the *Statement of Ethical Values* and *Standards of Ethical Conduct* which contains 12 standards that apply to all members of the UC community. Those standards (in conjunction with other University policies and procedures) provide guidance for application of the UC Values. Specifically, UC and its community members are committed to:

- **Integrity.** We will conduct ourselves with integrity in our dealings with and on behalf of the University.
- **Excellence.** We will conscientiously strive for excellence in our work.
- **Accountability.** We will be accountable as individuals and as members of this community for our ethical conduct and for compliance with applicable laws and University policies and directives.
- **Respect.** We will respect the rights and dignity of others.

The UC Statement of Ethical Values and Standards of Ethical Conduct can be found at <https://www.ucop.edu/ethics-compliance-audit-services/files/stmt-stds-ethics.pdf>.

Does the Code of Conduct Apply to Me?

The UC Davis Health Code of Conduct applies to all UC Davis Health personnel (all individuals who work, train or are students at health care locations). For purposes of this code, the term "personnel" refers to all parties who are involved in either the direct provision of patient clinical care services, or with providing staff, business, administrative, or patient care support services at UC Davis Health. All UC Davis Health personnel are responsible for knowing the Code of Conduct

and following it. UC Davis Health recognizes and adopts the UC Statement of Ethical Values and University of California Standards of Ethical Conduct.

UC Davis Health personnel are also responsible for following all federal and state laws, regulations, policies and procedures that apply to their area of work. Failure to do so could result in corrective action and/or disciplinary measures.

What Are My Responsibilities?

In order for UC Davis Health to fulfill its commitment to conducting business in an ethical, legal and professional manner, all UC Davis Health personnel must also make the same commitment. It is everyone's responsibility to:

- Know and comply with this Code of Conduct and the Compliance Program as they apply to your job;
- Avoid involvement in illegal, unethical, or otherwise improper acts;
- Seek guidance when in doubt about your responsibilities;
- Report any issues, concerns, suspected instances of non-compliance and/or suspected violations of this Code of Conduct;
- Assist authorized personnel in investigating all allegations of violations;
- Take responsibility for your actions; and
- Immediately notify the Compliance and Privacy Services (Compliance) Department or the UC Davis Health Office of Legal Affairs (Legal Affairs) if the government excludes you from participation in any federally funded programs.

What If I Have a Question or Need to Report an Issue?

The rules governing the health care industry can be complicated. For this reason, it is not always easy to know what the right decision is when it comes to compliance issues. If you have questions or concerns with any area of compliance, **please ask for help**. Some situations may not be covered by this Code of Conduct or policies and procedures, and it is always better to ask before taking an action that might be improper. UC Davis Health supports open discussion of ethical and legal questions.

As UC Davis Health personnel, you also have a personal responsibility to report any activity that appears to violate the Code of Conduct or any applicable laws, regulations, or University rules. In general, if you are aware of a compliance violation and fail to report it, you may be subject to corrective or disciplinary action.

If you have a question, concern, or need to report a compliance issue, you should take the following steps:

1. Communicate with a supervisor or manager

You should immediately discuss the issue with your supervisor, manager, or team leader because these individuals should be the most familiar with your particular job requirements and business practices. The supervisor should provide a timely response or work to seek alternative solutions.

2. Contact the Chief Compliance and Privacy Officer

The Chief Compliance and Privacy Officer has been designated as the individual with lead responsibility for compliance issues and reports directly to executive leadership within the health system. At any point in the process, you can bring a question or concern to the Chief Compliance and Privacy Officer or Compliance Department staff by phone at 916 - 734-8808, by e-mail at hs-ComplianceHelp@ucdavis.edu or you can visit the Compliance Department website at: <https://health.ucdavis.edu/compliance/>. This includes situations where you believe that you have not received an appropriate, timely, or ethical response from a supervisor.

3. Obtain help from other University resources

You can contact management within other UC Davis Health departments or the UC Office of the President. Resources within the University that are available to help include the Compliance Department, Human Resources, Audit and Management Advisory Services, and Legal Affairs.

4. Call the Compliance Hotline

At any point you can contact the Compliance Hotline to raise questions, clarify issues, or report suspected violations. Reports will be investigated or referred to appropriate personnel for resolution. If you contact the Compliance Hotline you may choose to remain anonymous. You can report a concern either by phone or online using the information below:

- Phone: 800-403-4744
- Online: <https://secure.ethicspoint.com/domain/media/en/gui/23531/index.html>

Open communication and the freedom to report concerns regarding the operations or ethics of the University are essential to a culture of compliance. University employees are prohibited from retaliating against an employee or applicant for raising questions or reporting suspected violations or wrongdoing in good faith. Retaliation, retribution, or harassment of anyone who makes a good faith report will not be tolerated. Additionally, UC policy, federal law, and state law protect any whistleblower employee or applicant for employment from retaliation for having reported an issue or made a whistleblower report. For more information on the UC Whistleblower policies visit: <https://www.ucop.edu/uc-whistleblower/>

Reports of suspected violations will be investigated by authorized University personnel. The University may make an appropriate disclosure to governmental agencies if a violation has occurred and reserves the right to take corrective action or disciplinary action. Disciplinary actions will be determined on a case-by-case basis and in accordance with the applicable University policies and procedures which can involve action up to and including termination.

How Do I Use the Hotline?

At any time you can call the Compliance Hotline to ask a question or report a concern at 800-403-4744. The people answering calls on the hotline are not employees of UC Davis Health. Here is what to expect if you make a call:

- The person answering the call will ask you if you want to remain anonymous. If you do, your call will be assigned a number. You can use this number to call back and obtain information on the status of your question or concern.

- Calls are not traced or recorded.
- The person taking the call will document the call and forward it to the UC Davis Office of Compliance and Policy to be triaged to the UC Davis Health Compliance Department or relevant UC Davis Health department. For anonymous calls, no UC Davis Health employee will be given the name of the caller.

Code of Conduct Principles

The following principles are the foundation for this Code of Conduct:

1. UC Davis Health personnel shall treat patients without discrimination and with respect, dignity and professionalism without regard to race, age, gender, religion, national origin, medical condition, physical or mental disability, ancestry, marital status, sexual orientation, citizenship, ability to speak English, or status as a covered veteran.
2. UC Davis Health personnel shall adhere to all applicable standards of professional practice and ethical behavior in carrying out the business of the clinical enterprise and should not feel forced or compelled to take part in unethical, improper, or illegal conduct.
3. UC Davis Health personnel are strongly encouraged to report all known or suspected improper governmental activities (IGAs) under the provisions of the [UC Whistleblower Policy](#). Managers and persons in supervisory roles are required to report allegations presented to them and to report suspected IGAs that come to their attention in the ordinary course of performing their supervisory duties. Reporting parties, including managers and supervisors, will be protected from retaliation for making such a report under the [UC Whistleblowers Retaliation Policy](#).
4. UC Davis Health personnel shall immediately direct questions or concerns regarding any of the Code of Conduct standards, federal regulations, billing, or if a federal or state health care insurance carrier's instructions are not clear to a supervisor. The University, federal and/or state government carriers, and other payers should, when necessary, work collaboratively to clarify and revise policies, procedures, and instructions in order to prevent errors or mistakes.
5. Since unintentional errors can occur in the normal course of doing business, it is the responsibility of both the University, as a health care provider and the federal government's contracted carrier, to report in a timely manner any errors and to adjust reimbursements accordingly for those errors.
6. University resources and assets should be used to conduct University business. UC Davis Health personnel shall not misuse University resources and assets which can include, but are not limited to University time, money, equipment and facilities.

Code of Conduct Standards

Standard 1 – Quality of Care

UC Davis Health will provide quality health care in a manner that is appropriate, medically necessary, efficient, and promotes a culture of safety.

1. All patients will be afforded quality clinical services.
2. Urgent and/or medically necessary services will be provided independent of payment methodology. The University's health care professionals will follow current medical and ethical standards regarding physicians and other health care providers' communication with patients, and where appropriate, their representative, regarding the care delivered.
3. UC Davis Health recognizes the right of patients to make choices about their own care, including the right to proceed without recommended care or to refuse treatment.
4. UC Davis Health personnel, generally the patient's health care providers, will inform patients about the alternatives and risks associated with the care they are seeking and obtain informed consent. To the extent possible, this information will be provided in a language that the patient can understand.

Standard 2 – Medical Necessity and Appropriate Services

UC Davis Health shall submit claims for payment to government, private, or individual payers for those services or items that are medically necessary and appropriate.

1. When ordering or providing services or items, University physicians (or other health care professionals authorized under the law to order items or services) shall only order those services and items that are consistent with generally accepted medical standards for diagnosis or treatment of disease and are determined by the profession to be medically necessary and appropriate.
2. In some cases, a health care professional may determine that services are medically necessary or appropriate, but the patient's health plan may not cover those services. In those cases, a patient should refer to his or her health plan administrator to receive information about the process for disallowed claims or uncovered benefits.
3. Patients may request services that are not covered benefits. Such services may be provided as long as the patient has been given advance notice and has agreed to pay for the services. In these cases, the patient may request the submission of a claim for the services to protect his or her appeal rights with respect to those services or to determine the extent of the coverage provided by the payer.
4. Professional coding and documentation will be consistent with the standards established by the relevant University programs and policies.

Standard 3 – Proper Coding, Billing, and Patient Accounting

UC Davis Health personnel involved in the coding, billing, documentation and accounting for patient care services for the purpose of billing government, private or individual payers must comply with all applicable state and federal regulations as well as University policies and procedures for detecting and preventing fraud, waste, and abuse.

1. The University will bill only for services actually rendered and shall seek the amount to

which the University is entitled. The University does not tolerate billing practices that misrepresent the services actually rendered.

2. Supporting medical documentation must be prepared for all services rendered. UC Davis Health personnel shall bill on the principle that if the appropriate and required documentation has not been provided, then the service has not been rendered.
3. All services must be accurately and completely coded and submitted to the appropriate payer in accordance with applicable regulations, laws, contracts, and University policies and procedures. In all cases, federal and state regulations take precedence, and University policies and procedures must accurately reflect those regulations.
4. UC Davis Health personnel must not submit claims for payment to government programs that they know or should know are false or fraudulent. UC Davis Health personnel involved in coding, billing, documenting and accounting for patient care must understand and act in accordance with UC Davis Health policy 1936, *Deficit Reduction Act Compliance*, as well as the federal and California False Claims Acts.
5. All patients shall be consistently and uniformly charged. Discounts will be appropriately reported, and items and services consistently described so that comparability can be established among payers.
6. Government-sponsored payers shall not be charged in excess of the provider's usual charges. Any questions regarding the interpretation of this standard should be directed to the Compliance Department.
7. Billing and collections will be recorded in the appropriate accounts. Credit balances must be processed in a timely manner in accordance with applicable rules and regulations. When the cost report process identifies any credit balances, UC Davis Health personnel shall direct those issues to the health system's accounting or other personnel responsible for patient accounts.
8. UC Davis Health personnel should be aware of the University Teaching Physician Guidelines for Professional Fee Billing. The guidelines provide for the policies and procedures to be followed when the University bills payers for teaching physician professional fees. UC Davis Health personnel responsible for coding, billing, and documentation should be knowledgeable about University policies and procedures and federal and state regulations regarding those activities. The University shall provide these individuals with opportunities for training to allow them to accurately document, code, and bill according to federal and state regulations and the University's policies and procedures. Management should ensure that appropriate evaluation processes have been established to assess whether UC Davis Health personnel understand and carry out correct procedures.
9. Elective procedures that are not covered by governmental or private payers can be provided. However, before providing any elective services, the provider must inform the patient that these services may not be covered. The provider should obtain the patient's agreement to pay for the services if payers deny the claim. A patient has the right to have

a claim submitted even if services are excluded from coverage.

10. An accurate and timely billing structure and medical records system is critical to ensure that UC Davis Health personnel can effectively implement and comply with required policies and procedures. Demonstrated lapses in the information and billing systems infrastructure should be remedied in a timely manner by the relevant executive management team, other designated University personnel, and billing entities.

Standard 4 – Proper Cost Reporting

UC Davis Health personnel who are responsible for the preparation and submission of cost reports must ensure that all such reports submitted to government and private payers are properly prepared and documented according to all applicable federal and state laws.

1. In submitting and preparing cost reports, all costs will be properly classified, allocated to the correct cost centers, and supported by verifiable and auditable data.
2. It is the University's policy to correct any cost report preparation or submission errors and mistakes in a timely manner and, if necessary, clarify procedures and educate employees to prevent or minimize recurrence of those errors.

Standard 5 – Respect of Confidentiality

All efforts will be made to protect personal and confidential or privileged information concerning UC Davis Health and its patients, as well as the respective health care practices of those entities. UC Davis Health personnel will abide by applicable state and federal laws, including HIPAA privacy and security regulations.

1. UC Davis Health personnel shall not disclose confidential patient information unless authorized by the patient and/or when authorized by law. Approval for appropriate use of patient information for research purposes must be obtained from the Institutional Review Board or Compliance Department.
2. UC Davis Health personnel shall only use confidential information to perform their job responsibilities and must not share such information with others unless the individual or entities have a legitimate business need to know the information and/or sharing such information is permitted under an existing contractual agreement.
3. Confidential patient information should only be discussed with or disclosed to appropriate University personnel as permitted by HIPAA policies.
4. Confidential patient information should not be discussed with or disclosed to non-University personnel unless authorized by the patient or permitted by law. Non-University personnel include the family or business and social acquaintances of the patient or of University personnel, customers, suppliers, or others.
5. In general, patients can request and are entitled to receive copies or summaries of their

records with the exception of non-emancipated minors, some mental health patients, and patients being treated for alcohol and drug abuse, who may be provided with copies of the records if it is appropriate as judged by their clinician.

6. Some information may be sought under the *California Public Records Act*, the *Information Practices Act*, or other statutes requiring the release of information.
7. UC Davis Health personnel who have any questions regarding patient confidentiality should refer to UC Davis Health policies for additional information and consult with the appropriate supervisor or manager, the Compliance Department, or the Privacy Officer.
8. UC Davis Health personnel shall not reveal or disclose confidential medical staff or peer review information. California and federal law bestows certain privileges and provides for confidentiality of certain records including the proceedings and records of organized committees of the medical staff and peer review bodies.
9. UC Davis Health personnel shall not reveal or disclose proprietary or trade secret information to unauthorized non-University persons. Proprietary information may relate to University business affairs or the affairs of a vendor or contractor.
10. Personnel records are considered confidential. Access to personnel files is limited to management, the Human Resources department staff, and internal auditors, and these individuals are held accountable for protecting the privacy of personnel records.

Standard 6 – Creation and Retention of Accurate Patient and Institutional Records

All patient and institutional records are the property of the University. Personnel responsible for the preparation and retention of records shall ensure that those records are accurately prepared and maintained in a manner and location as prescribed by law and University policy.

1. The complete and accurate preparation and maintenance of all records (medical, professional, financial, electronic, paper, and institutional) by University physicians, clinicians, nurses, and others are important for providing quality care and conducting business of the University's clinical enterprise. Accurate records are required for the University hospital and clinics to retain licensure and accreditation.
2. UC Davis Health personnel will not knowingly create records that contain any false, fraudulent, fictitious, deceptive, or misleading information.
3. UC Davis Health personnel must not delete any entry from a medical record. Medical records can be amended and material added to ensure accuracy of a record in accordance with medical center and Medical Staff policies and procedures. Whenever UC Davis Health personnel amend and correct a record, the author must indicate that the notation is an addition or correction and record the actual date that the additional entry is made. Deletions to correct errors due to data integrity errors are exempt and may only be made by authorized individuals as part of the chart integrity correction program within the Health Information Management Department.

4. UC Davis Health personnel must not sign someone else's signature or initials on a record unless they have been authorized and clearly marked that they are signing on behalf of another (e.g., by initialing the signature).
5. UC Davis Health records shall be maintained according to accepted standards and principles of the particular profession and applicable University policies and procedures.
6. Unless authorized by University policy, UC Davis Health personnel shall not destroy or remove any University records from the University's premises except as necessary for a work-related purpose.
7. The University's record retention and record destruction policies and procedures must be consistent with federal and state requirements regarding the appropriate time periods for maintenance and location of records.
8. UC Davis Health personnel must ensure that the University's financial records fairly represent actual business transactions and conform to generally accepted accounting principles as well as other applicable government and University standards.

Standard 7 – Cooperation with Government Investigations and Requests for Information

UC Davis Health personnel shall cooperate with appropriately authorized governmental investigations and audits.

1. UC Davis Health policy 1053, *Regulatory Agency Reviews*, advises UC Davis Health personnel on the procedures to be followed when representatives of the government arrive unannounced. The policy establishes a procedure for an orderly response to a government request to enable the health system to protect its and its patients' interests while fully cooperating with an investigation.
2. When a representative from a federal or state agency contacts UC Davis Health personnel for information regarding UC Davis Health, any affiliated health care entity, or any other entity with which the health system does business, the individual should contact the hospital director immediately. If the hospital director is not immediately available, the individual should contact the Compliance Department, Medical and Regulatory Affairs, Legal Affairs, or UC Davis Campus General Counsel. UC Davis Health personnel should ask to see the government representative's identification and business card, if the government representative is there in person. Otherwise, UC Davis Health personnel should ask for the person's name, office, address, telephone number, and identification number, and then call the government representative's office to confirm his or her authority.
3. Everyone is expected to cooperate fully with governmental and University investigations and audits. Making false or misleading statements to a government representative is strictly prohibited. UC Davis Health personnel shall not destroy or alter records in anticipation of a government request for a document or record.

Standard 8 – Prevention of Improper Referrals or Kickbacks

UC Davis Health personnel must not accept or offer, for themselves or for the University, anything of value in exchange for referrals of business or the referral of patients.

1. Federal law generally prohibits anyone from offering anything of value to a Medicare, Medicaid or TRICARE patient that is likely to influence that person's decision to select or receive care from a particular health care provider.
2. UC Davis Health personnel may not offer or receive any item or service of value as an inducement for the referral of business or patients to or from University providers or practitioners or outside facilities. Regulations prohibit improper influence that could alter clinical decisions or purchasing decisions, increase costs, or lead to over or under utilization of services.
3. In addition to the prohibition regarding exchange of goods or money to induce referral, certain prohibitions exist with regard to receipt of gifts by UC Davis Health personnel.
4. Federal law prohibits a physician from referring a patient for certain health services to a facility where that physician (or a family member) has a financial interest (Stark regulations).
5. UC Davis Health personnel shall adhere to the University's policy as defined in the [UC Compendium of Conflict of Interest and Integrity Policies](#), the California Political Reform Act and the UC Davis and UC Davis Health gift policies.
6. UC Davis Health shall establish procedures for the review of all pricing and discounting decisions to assure that appropriate factors have been considered and that the bases for such arrangements are documented.
7. The following types of business arrangements must be reviewed and approved by one or more of the relevant executive management teams to assure compliance with University policies and federal regulations. The executive management team may determine that certain business transactions must first be approved locally, in accordance with University policy, but the University's Board of Regents is charged with taking action on such matters:
 - a. Pursuing joint ventures, partnerships, corporations;
 - b. Developing hospital financial arrangements with hospital-based physicians;
 - c. Entering into an arrangement to lease or purchase equipment or supply items from a vendor; or
 - d. Acquiring physician's practices, hospitals, and other facilities, clinical, and ancillary services, or any other entities.

Standard 9 – Adherence to Antitrust Regulations

UC Davis Health will comply with all applicable federal and state antitrust laws. UC Davis Health personnel shall not, for example:

- agree, or attempt to agree, with a competitor to artificially set prices or salaries;
- divide markets, restrict output, or block new competitors from the market;
- share pricing information with competitors that is not normally available to the public;
- deny staff privileges to physicians or allied practitioners, individually or as a group, when there is no academic programming decision to do so and when such decisions should be based on individual qualifications; or
- agree to participate with competitors in a boycott of government programs, insurance companies, or particular drugs or products.

Standard 10 – Avoidance of Conflicts of Interest

All UC Davis Health personnel shall conduct clinical enterprise and personal business in a manner that will avoid potential or actual conflicts of interest.

1. UC Davis Health personnel shall not use their official positions to influence a University decision in which they know, or have reason to know, that they have a financial interest. UC Davis Health personnel should follow the [UC Compendium of Conflict of Interest and Integrity Policies](#) and UC Davis and UC Davis Health conflict of interest policies and procedures so they can be knowledgeable about activities that may be actual or potential conflicts of interest. Examples of such activities may include, but are not limited to, the following:
 - a. giving or receiving gifts, gratuities, loans, or other special treatment of value from third parties doing business with or wishing to do business with the University in a manner that is not in accordance with the UC Davis Health policy [2204](#), *Gifts and Interactions with Vendors* and the *California Political Reform Act*. Third parties may include, but are not limited to, customers, patients, vendors, suppliers, competitors, payers, carriers, and fiscal intermediaries;
 - b. using the University facilities or resources for activity other than University activities;
 - c. using the University's name to promote or sell non-University products or personal services; and
 - d. contracting for goods or services with family members of University personnel directly involved in the purchasing decision.
2. UC Davis Health personnel should consult with a supervisor, executive management, the Compliance Department, the campus conflict of interest coordinator, Legal Affairs or UC Davis Campus General Counsel prior to engaging in any activity that could raise conflict of interest issues.

Standard 11 – Respect for Patient's Freedom of Choice

When referring patients to home health agencies, medical equipment suppliers or long term-care and rehabilitation providers, UC Davis Health personnel should respect the patient's right to

choose his or her own providers.

Some health care plans limit the patient's choice of provider or pay less than the full cost of a provider. The patient has the freedom to choose providers not in his or her health program or insurance panel, provided the patient is willing to pay for the non-covered care.

Standard 12 – Honest and Fair Business Practices

UC Davis Health personnel shall adhere to fair business practices and accurately and honestly represent themselves and the University's services and products.

1. UC Davis Health personnel will be honest and truthful in all marketing and advertising practices pertaining to the business practices of UC Davis Health.
2. Vendors who contract to provide goods and services to UC Davis Health will be selected on the basis of quality, cost-effectiveness and appropriateness for the identified task or need, in accordance with University policy.

Standard 13 – Fair Treatment of Employees

The University prohibits discrimination in any work-related decision on the basis of race, color, national origin, religion, sex, physical or mental disability, medical condition (cancer-related or genetic characteristics), ancestry, marital status, age, sexual orientation, citizenship, or status as a covered veteran. The University is committed to providing equal employment opportunity and a work environment where each employee is treated with fairness, dignity, and respect.

1. The University will make reasonable accommodations to the known physical and mental limitations of otherwise qualified individuals with disabilities. If an individual requires accommodations or needs assistance, they should contact UC Davis Health Disability Management Services.
2. The University does not tolerate harassment or discrimination by anyone based on the diverse characteristics or cultural backgrounds of those who work for the University pursuant to the [University of California Non-discrimination and Affirmative Action Policy Regarding Academic and Staff Employment](#).
3. Any form of workplace violence or sexual harassment is strictly prohibited. UC Davis Health personnel should refer to UC Davis and UC Davis Health policies addressing workplace violence and sexual harassment.
4. For employees who observe or experience any form of discrimination, harassment or violence, the University provides a number of ways to report the incident, including but not limited to the following: a supervisor, manager, the Chief Compliance and Privacy Officer, Legal Affairs, UC General Counsel, UC Davis General Counsel, Human Resources, the UC Davis Office of Equal Opportunity & Diversity, the Compliance Hotline, and the appropriate Academic Senate committee.

Standard 14 – Clinical Research

Integrity in research includes not just the avoidance of wrongdoing, but also the rigor, carefulness, and accountability that are the hallmarks of good scholarship. University policies set forth expectations for high standards of ethical behavior for faculty, staff, and students involved in research. The rights of research study participants, their well-being, and privacy are protected by the University through compliance with ethical standards as well as all applicable University policies and federal and state regulations.

1. All members of the University community engaged in research are expected to conduct their research with integrity and intellectual honesty at all times and with appropriate regard for human subjects.
2. To protect the rights, well-being, and privacy of human subjects, all research involving human subjects is to be reviewed by institutional review boards. All those engaged in research shall follow all IRB-issued directives, applicable laws, and University rules for patient privacy and human subject protection when creating, using, and disclosing information regarding clinical trial subjects.
3. The University prohibits research misconduct. Personnel engaged in research are not to: fabricate data or results, change or knowingly omit data or results to misrepresent results in the research record, or intentionally misappropriate the ideas, writings, research, or findings of others.
4. All those engaged in research are expected to pursue the advancement of knowledge while meeting the highest standards of honesty, accuracy, and objectivity. Individuals engaged in research must also demonstrate accountability for sponsors' funds and comply with specific terms and conditions of contracts and grants.
5. Costs to perform clinical trials shall be charged to the appropriate funding source (i.e., clinical trial fund, third party payor, patient). In accordance with University policy (UCOP [Operating Requirement No. 95-5](#), "*Requirements for Administration of Agreements with Private Sponsors for Drug and Device Testing Using Human Subjects*"), the cost of clinical trials of drugs or devices conducted according to the sponsor's protocols should always be fully funded by the sponsor and may not be supported in whole or in part with other funds, including gift or foundation funds. All costs that are associated with the conduct of the clinical trial must be charged to the clinical trial fund and should not be charged to other University funds or be billed to third party medical insurance, unless FDA approval for such charge is documented.
6. Goods and services shall be procured in a competitive, fair and timely manner in compliance with the [Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards](#) and University policies. Conflicts of interest must be avoided. Educational or research grants or other funds received from commercial entities are not permitted to influence procurement decisions.
7. Ongoing monitoring and auditing processes, with initiation of appropriate corrective action,

ensure the University's clinical research programs are well managed.

8. The records retention program for clinical research ensures documents and other necessary supporting evidence are maintained for the appropriate length of time as required by federal and state regulations, and University policy. This program evaluates and verifies the effectiveness of the systems and internal record retention procedures.