

Code of Ethics 2020

MOFFITT CANCER CENTER



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To all members of the Moffitt Workforce:



Donnetta Horseman
*Chief Compliance Officer
Moffitt Cancer Center*

At Moffitt, we are committed to providing the best patient care and conducting research with the highest standard of business ethics and in compliance with all laws. Achievement of our mission depends upon each of us being accountable for upholding Moffitt's values of compassion, drive, inclusion, imagination and excellence.

Building a good reputation is difficult, but losing it is easy. Each action we take, no matter how large or small, impacts our reputation with patients, business partners and fellow team members.

The Code of Ethics and Professional Conduct (CODE) is our guide for making decisions that support our values and helps maintain the reputation that makes us proud. Please take time to familiarize yourself with the CODE. You should read and refer to it often to guide your decision making. The information presented will provide you with a comprehensive foundation for understanding compliance issues and the ethical standards under which we operate. While this information is designed to provide overall guidance, it does not address every situation.

We encourage you to speak 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, contact your immediate supervisor or myself. Your involvement and vigilance are important. Thank you for your adherence to our values and standards.

Leadership Responsibilities

While all members of Moffitt’s workforce are expected to follow the Code of Ethics & Professional Conduct, we expect our leadership to set an example and to be a role model in every respect. Leaders 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.

Moffitt Values

At Moffitt, our patients always come first and it’s this commitment that has been at the heart of our mission since our doors opened in 1986. Our values ensure our core beliefs reflect who we are and how we will continue to make an impact in the lives of those affected by cancer – for the next 10 years and beyond.

COMPASSION

We deliver hope, empowering and encouraging those we serve, and those who serve.

DRIVE

We are courageous and determined in our relentless pursuit of our purpose, because we never lose sight of those who depend on us.

EXCELLENCE

We strive for global impact through perseverance and persistence, and never settle for anything but our best.

IMAGINATION

We are bold in our pursuit of new and better ways to transform health, wellness and healing.

INCLUSION

We are a diverse and unified team, which strengthens us, and fosters the trust, respect and collaboration that is core to our being.

Guiding Principles

- All workforce members 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 stay abreast of and follow Moffitt policies.
- 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, Moffitt provides resources for reporting your questions or concerns:

- **Compliance Hotline 1-844-760-5840**
- **Compliance Reporting Website at MyComplianceReport.com/Brand/Moffitt**
- **Corporate Compliance Office at 813-745-1869 or email CorporateCompliance@Moffitt.org**

Resource Links

Throughout the CODE you will find Resource Links to policies and documents to help guide you. These resource links are not all inclusive. Please refer to the Moffitt Policy Library and any department-specific policies and procedures as needed to guide your actions.

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. Moffitt will ensure that all reported concerns are thoroughly investigated and that appropriate action will be taken.

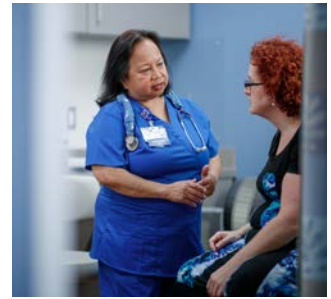
The CODE addresses the following standards:

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, 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.
- Report safety incidents utilizing the Center’s Safety/Occurrence reporting system in a timely manner without fear of retaliation.

Basics to Remember:

- The Safety/Occurrence reporting system can be found on Moffittnet under My Applications.
- Workforce members who do not have computer access may ask another team member to enter a safety report on their behalf.
- Workforce members can direct grateful patients to the Foundation.



RESOURCE LINKS

[Safety/Occurrence Report Policy ADM-0001](#)

[EC 1.3 Safety Management Plan](#)

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 Moffitt'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.



Basics to Remember:

- The Conflict of Interest (COI) disclosure application is located on Moffittnet under My Applications.
- New significant financial relationships must be disclosed within 30 days of acquiring the new interest.

RESOURCE LINKS

[Conflicts of Interest in Research ADM-C028](#)

[Research Misconduct Policy MRI-P.RA.04](#)

[Intellectual Property Policy ADM-I007](#)

[Informed Consent Policy MRI-P.CRO.02](#)

[Responsibilities of Principal Investigators Policy MRI-P.CRO.23](#)

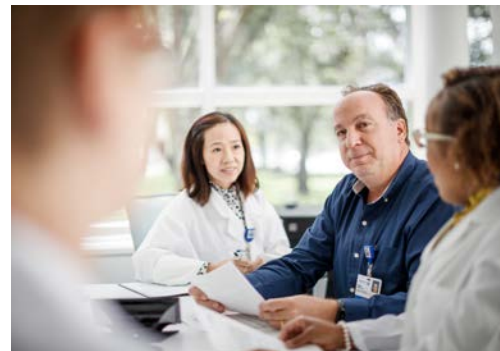
STANDARD 3

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 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.
- Provide mandatory training and education to workforce members.
- Treat all workforce members fairly, equitably and consistently. Our actions should not create or give the appearance of favoritism.
- 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 workforce members, business partners and organizations with which we do business and 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.
- Avoid conduct off the job that could impair work performance or affect Moffitt's reputation or business interests.



Basics to Remember:

- Completion of annual mandatory training is a requirement in order to receive a merit increase.
- The Learning Center can be accessed on Moffittnet under QuickLinks.



RESOURCE LINKS

[Relationships in the Workplace Policy WR-14](#)

[Recruitment and Selection Policy E-01](#)

[Exclusion and Sanction Screening Policy ADM-E023](#)

[Equal Employment Opportunity/Affirmative Action Employer Status Policy GP-08](#)

[Mandatory Education Policy GP-13](#)

[Harassment and Discrimination Policy ADM-H013](#)

[Sexual Harassment, Sexual Abuse & Sexual Misconduct ADM-S010](#)

[Conduct Guidelines WR-01](#)

[Non-Retaliation Policy Board Rule BR-0006](#)

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 Moffitt's tax-exempt purpose and values.
- Not engage in any illegal business practices intended to influence the decision of any external representative, including bribery, kick-backs or payoffs.
- Allow Moffitt to obtain a non-disclosure agreement with the other party before discussing any confidential or proprietary information with a potential vendor, supplier or subcontractor,
- 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.
- Not participate in procurement or contracting actions where a personal conflict of interest exists.
- Maintain all Moffitt 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 Moffitt 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 Moffitt'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 all licenses and credentials up to date.
- Report to Compliance and Purchasing any conduct by our business partners that does not meet our requirements.

Basics to Remember:

- No Moffitt records can be disposed of or destroyed without completion and approval of the Records Disposition form, which is located on Moffittnet under Corporate Compliance/Records Retention and Disposal.
- Only authorized individuals can sign contracts or agreements on behalf of Moffitt.
- Workforce members must immediately report any change to their license/credentials to the Human Resources department. Failure to do so may result in termination of employment.

RESOURCE LINKS

- [Kronos Timekeeping Staff Policy ADM-T011](#)
- [Documentation of Personnel Expenses Policy ADM-D018](#)
- [Travel and Business Expense Reimbursement ADM-T002](#)
- [Record Retention and Disposal Policy BR007](#)
- [Legal Hold Policy ADM-L007](#)
- [Anti-Fraud Board Rule BR-001](#)
- [Purchasing Function Policy ADM-P013](#)
- [Foreign Corrupt Practices Act Policy ADM-F014](#)
- [Contract Management and Oversight Policy ADM-C020](#)

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 Moffitt activities and patient information by accessing, releasing and discussing such activities and information according to all applicable laws, regulations and policies.
- Access patient records, whether written or electronic, only when the information in the records is needed to carry out my job responsibilities. Limit the use and sharing of patient information to the minimum necessary or smallest amount needed.
- Preserve and protect the confidentiality of all research data, including protocol information, study data, and human subjects data.
- 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.
- Ensuring all information and data are prepared with care and diligence, and that all policies, controls and processes are followed to adequately protect all Moffitt data.
- Limit workforce member access to protected information is based upon role/job function and the classification of the information requested.
- Safeguard and secure all Moffitt technology assets at all times Computer assets authorized to be removed from Moffitt facilities for business purposes must be protected by the user at all times during transport and remote use.
- Immediately report potential privacy disclosures of protected health information, security incidents and or other concerns regarding the security or misuse of Moffitt confidential information, including user ids and passwords.

Basics to Remember:

- Workforce members are not permitted to share user ids and passwords.
- All activity on the Moffitt network, including email and chat services, is monitored by Moffitt and is owned by the organization, not the individual.
- Workforce members should not store personal documents or photos on a Moffitt device or network.
- Contact the IT Help Desk or Cyber Security for guidance on sharing confidential or proprietary data outside of the Moffitt network.
- Immediately report a potential privacy or security breach.

RESOURCE LINKS

- [Acceptable Use of Information Resources Policy ADM-A015](#)
- [Confidentiality of Patient Information Policy ADM-C017](#)
- [Minimum Necessary Policy ADM H016](#)
- [Electronic Data Classification Policy ADM-E026](#)
- [Breach Notification: Reporting Involving the Privacy or Security of PHI ADM-B005](#)
- [Cyber Incident Response Plan ADM-C048](#)
- [Privacy Incident Response Plan ADM-P070](#)
- [Sanctions for Privacy Violations Policy ADM-S025](#)
- [European Union General Data Protection Regulation Policy ADM-G009](#)
- [ePHI Data Management and Encryption Policy ADM-E014](#)
- [External Transfer of Electronic Protected Health Information ADM-E008](#)
- [Bring Your Own Device \(BYOD\) Policy ADM-B007](#)
- [Confidentiality of Protocols and Study Data Policy MRI-P. CRO.10](#)
- [Insider Trading Policy ADM-I010](#)

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 overpayment 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 the study sponsor.

Basics to Remember:

- Documentation in the medical record must be accurate, professional in appearance, and reflect the findings, assessment and plan of the authenticating Provider.
- Each Provider is responsible for properly documenting and utilizing the electronic health record for patient care as the official medical record and the electronic health record (EHR) of the patient.



RESOURCE LINKS

[Billing Integrity Policy ADM-B006](#)

[Electronic Provider Documentation Policy ADM-E018](#)

[Revenue Cycle, Health Information Coding Processes ADM-R026](#)

[Revenue Cycle, Billing ADM-R019](#)

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 Moffitt.

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 any proprietary or non-public information acquired as a result of a relationship with Moffitt is not used for the gain of another business, personal gain, or insider trading.
- Promptly and properly disclose any situation, which could create the potential for a conflict of interest.
- Conduct all fundraising ethically within the Center's guidelines and in support of Moffitt'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 Moffitt's needs.
- 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 Moffitt 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.

Basics to Remember:

- Workforce members may not accept gifts of any kind from patients or industry.
- Workforce members may not sell personal items or conduct personal fundraising on Moffitt premises or using Moffitt resources. This includes bake sales, girl scout cookies, school fundraisers, etc.
- Workforce members may not solicit industry to sponsor events or conferences at Moffitt.



RESOURCE LINKS

- [Institutional Conflicts of Interest Policy ADM-I018](#)
- [Conflict of Interest Board Rule BR004](#)
- [Industry Gifts and Gratuities Policy ADM-I012](#)
- [Solicitation and Distribution of Information Policy WR-09](#)
- [Establishment & Disbursement of Foundation Funds ADM-P007](#)
- [Conference Planning Financial Management Policy ADM-C019](#)
- [Continuing Education at the Cancer Center ADM-C029](#)
- [Conflict of Interest in Research Policy ADM-C028](#)
- [Donation Acceptance and Recognition Policy ADM-D006](#)

STANDARD 8

Safeguard Resources and Property

We will use our resources wisely and will be accountable for their proper use. We are entrusted with Moffitt resources and assets to perform our work. We are responsible for safeguarding Moffitt property, funds, intellectual property, information, records and tools.



We / I Shall...

- Be responsible and accountable for the proper use of our funds.
- Acquire, preserve, and dispose of Moffitt's assets, property, facilities, equipment and supplies in accordance with Moffitt policies.
- Use time at work responsibly for work related activities. Moffitt assets (including use of Moffitt premises) may not be used to support another business, consulting work, or activity from which the workforce member receives any compensation or benefit.
- Use electronic communications (e.g., email, internet) responsible and in accordance with the Moffitt 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 Moffitt.
- Use our computer networks, including email, instant messages and internet during working time for business purposes only and in compliance with applicable Moffitt policies.

Basics to Remember:

- Moffitt funds, including procurement cards and reward and recognition cards, may not be used for personal purposes and may only be used for legitimate business expenses.
- Workforce members must ensure expenses are “allowable” prior to charging to an award, grant or other research funding.
- All outside activity must be approved in advance and disclosed in the Conflict of Interest disclosure system.

RESOURCE LINKS

- [Charging Costs to Federal Awards Policy ADM-C054](#)
- [Social Media: Guidelines for Use ADM-S023](#)
- [Acceptable Use of Information Systems Resources Policy ADM-A015](#)
- [Outside Employment Policy E-16](#)
- [Faculty Outside and Scholarly Activities Policy ADM-F009](#)
- [Compensation for Team Member Outside Activities Policy ADM-C009](#)

STANDARD 9

Maintain a Safe Environment

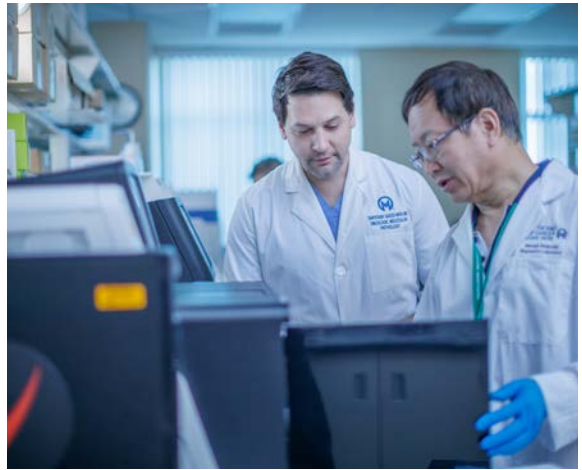
We are committed to providing a safe environment for our faculty, workforce members, patients and visitors.

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 judgement and safe practices when working with or lifting patients, equipment, property and medical products.
- Use appropriate Personal Protective 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 Moffitt 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.

Basics to Remember:

- Moffitt prohibits the unauthorized manufacture, possession, use, sale, and distribution drugs in the workplace.
- Report potential exposures to your Manager/Supervisor, Occupational Health, and complete the RL Solutions incident report. Follow all health and safety policies and procedures in order to maintain a physical environment free of hazard.
- It is the responsibility of all Workforce members to immediately report any threats or acts of violence to their supervisor, Human Resources, or the Security Department ext. 44.



RESOURCE LINKS

[Violence Free Workplace Policy GP-12](#)

[Drug Free Workplace Policy GP-10](#)

[Security Management Plan EC 1.4](#)

[Safety Management Plan EC 1.3](#)

[Fire & Life Safety Management Plan EC 1.7](#)

[Emergency Management/Operations Plan EC 1.6](#)

[Hazardous Materials & Waste Management Plan EC 1.5](#)

[Medical Equipment Management Plan EC 1.8](#)

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 a culture at work that is free of 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 culture and linguistic competence, diversity and inclusion in the workplace, the care of patients, the conduct of research, and all other Moffitt activities.

Basics to Remember:

- Workforce members are responsible for upholding safe work environments that promote mutual respect and pleasant working relationships free from all forms of unlawful harassment and/or discrimination.
- Communicate recommendations or constructive criticism in a reasonable manner and in good faith with the aim of improving patient care, research, safety and workforce member interactions.



RESOURCE LINKS

- [Team Member Engagement Network \(TMEN\) ADM-T008](#)
- [Supplier Diversity Policy and Procedures ADM-M004](#)
- [Transgender and Transitioning Team Member Inclusion ADM-T012](#)
- [Language and Communication Assistance ADM-L008](#)
- [Conduct Guidelines WR-01](#)
- [Disciplinary Action WR-02](#)

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