Andrew D. Martin
CHANCELLOR

TO: Members of the Washington University Community

FROM: Andrew D. Martin, Chancellor

RE: Washington University Code of Conduct

As members of the Washington University community, we are all responsible for maintaining the highest ethical standards in our community and our professions, and for complying with all relevant laws and regulations.

In April 2000, the University, with the encouragement and guidance of the Board of Trustees, established a University Compliance Office. As part of this effort, a Washington University Code of Conduct has been created. The Code of Conduct is not a list of rules. It is a statement of the ethical and legal standards we use as the basis for our decisions and actions. All members of the University community should integrate these standards into their daily University activities.

The Code of Conduct consists of this message, a Statement of General Principles, Procedures for Reporting Violations or Concerns, and Questions and Answers.

The Code of Conduct may be revised from time to time. An up-to-date version of the Code will always be available on this website: https://universitycompliance.wustl.edu/

If you have any questions about the Code of Conduct, please contact the University Compliance Office at (314) 362-4915 or universitycompliance@wustl.edu.

ADM/nel

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Campus Box 1192
One Brookings Drive
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314.935.5100

Statement of General Principles

This code applies to the following members of the Washington University community: (a) individuals who are paid by Washington University when they are working for the University—this category includes faculty and staff; (b) consultants, vendors, and contractors when they are doing business with the University; and (c) individuals who perform services for the University as volunteers. The Code of Conduct refers to all these persons collectively as "members of the University community" or "community members."

Integrity and Ethical Conduct

Washington University is committed to the highest ethical and professional standards of conduct as an integral part of its mission, the promotion of learning. To achieve this goal, the University relies on each community member's ethical behavior, honesty, integrity, and good judgment. Each community member should demonstrate respect for the rights of others. Each community member is accountable for their actions.

This Code of Conduct describes standards to guide us in our daily University activities, standards we believe are already being followed.

Compliance with Laws and University Policies

The University and each community member must transact University business in compliance with all laws, regulations, and University policies related to their positions and areas of responsibility. Managers and supervisors are responsible for teaching and monitoring compliance in their areas.

Procedures for Reporting Violations or Concerns

The University's compliance effort focuses mainly on teaching members of the University community the appropriate compliance standards for the areas in which they work. Nevertheless, violations may occur. In addition, members of the University community may have concerns about matters that they are not sure represent violations. This section describes community members' responsibilities for reporting violations or concerns, and how these responsibilities may be carried out.

Each community member is expected to report violations or concerns about violations of this Code of Conduct that come to their attention. Managers have a special duty to adhere to the standards set forth in this Code of Conduct, to recognize violations, and to enforce the standards. Disciplinary actions for proven violations of this Code, or for retaliation against anyone who reports possible violations, will be determined on a case-by-case basis and may include termination of employment. Individuals who violate the Code may also be subject to civil and criminal charges in some circumstances.

How to Report a Violation or Discuss a Concern

You may report violations or concerns to your immediate supervisor or department head, if appropriate. You may also call the University Compliance Hotline at the number established for this purpose: (314) 362-4998. Reports may be made anonymously to this number, if the caller so desires. The University Compliance Office telephone line has no caller identification or number recognition.

You may also access an online form on the Code of Conduct website that can be used to report violations or concerns which can also be reported anonymously. Here is the link: https://universitycompliance.wustl.edu/code-of-conduct/

For matters dealing with one of the specific areas below, you may call the number indicated, or you may call the University Compliance Office (314) 362-4915.

Animal Care Issues
Dr. Mark Lowe, Vice Chancellor for Research, Interim (314) 747-0515

Computer Use & Security Policies
Matters pertaining to the Danforth Campus schools or the Central Fiscal Unit:
Chris Shull, Chief Information Security Officer (314) 747-2955

Matters pertaining to the School of Medicine:
Joe Susai, WUSM Executive Director & Chief Information Security Officer (314) 273-4733

Conflict of Interest Issues – Research
Dr. Mark Lowe, Vice Chancellor for Research, Interim (314) 747-0515

Conflict of Interest Issues – Clinical and Physician Relationships with Drug and Medical Equipment or Device Companies
Dr. Paul Scheel, Vice Chancellor for Clinical Affairs (314) 362-6249

Conflict of Interest – Procurement Matters
Gregory Parrott, Director, Resource Management (314) 935-5024

Environmental Health and Safety Matters

Lance Franklin, Asst. Vice Chancellor for Environmental Health & Safety	(314) 362-6816

Export Control

Hollie Noia, Manager of Research Compliance	(314) 747-1378
Dr. Mark Lowe, Vice Chancellor for Research, Interim	(314) 747-0515

Family Educational Rights & Privacy Act (FERPA)

Keri Disch, University Registrar	(314) 935-5959

Financial Matters

Amy Kweskin, Executive Vice Chancellor for Finance & CFO	(314) 935-9018

HIPAA (Health Insurance Portability Act)

HIPAA Privacy

Christine Schorb, HIPAA Privacy Officer	(314) 747-0865

HIPAA Security

Matters pertaining to the School of Medicine:

Joe Susai, WUSM Executive Director & Chief Information Security Officer	(314) 273-4733

Matters pertaining to Danforth Campus schools or the Central Fiscal Unit:

Chris Shull, Chief Information Security Officer	(314) 747-2955

Human Studies

Dr. Mark Lowe, Vice Chancellor for Research, Interim	(314) 747-0515

Human Resources/Personnel Matters

All Campuses

Scot Bemis, Vice Chancellor for Human Resources & Institutional Equity	(314) 935-1136
Apryle Cotton, Assistant Vice Chancellor for Human Resources	(314) 362-6774

International Activities/Foreign Corrupt Practices Act

Amy Kweskin, Executive Vice Chancellor for Finance & CFO	(314) 935-9018

Minors at WU or participating in WU programs/Reporting suspected child abuse, neglect or inappropriate interactions with minors

Scot Bemis, Vice Chancellor for Human Resources & Institutional Equity	(314) 935-1136
John Ursch, Executive Director of Protective Services at WUSM	(314) 362-4357
Angela Coonce, Chief of Campus Police	(314) 935-2772

Physician and Medical Professional Billing Matters

Jane Ditch, Director of Physician Billing Compliance	(314) 747-7660

Research Financial Management Matters

Dr. Mark Lowe, Vice Chancellor for Research, Interim	(314) 747-0515

Research Integrity Issues

Dr. Mark Lowe, Vice Chancellor for Research, Interim	(314) 747-0515

Questions and Answers

1. What are the various areas of University activity governed by federal and state laws and regulations?

The activities listed below are among those governed by federal and state laws and regulations. The Web site references will give you more information about these requirements, and how Washington University complies with them.

Managers and supervisors are responsible for complying with federal and state laws and regulations affecting their areas of responsibility and for ensuring that members of the university community under their direction do so as well. Managers and supervisors are responsible for determining the appropriate level of knowledge that each university community member under their direction needs in order to do their work correctly and compliantly, and for ensuring they receive the appropriate information and training. To help achieve compliance and obtain appropriate information and training, managers and supervisors should access the relevant

Washington University policies and information on the corresponding websites indicated, as well as request advice and assistance as needed from the pertinent university personnel and area-specific compliance offices described throughout the rest of this answer to Question 1. If in doubt of whom to contact, contact the University Compliance Office at 362-4915 for assistance in making that determination.

Examples of areas of university activity governed by federal and state laws and regulations are as follows:

Computer use & security policies

Washington University strives for balance between its desire to promote and enhance the free exchange of ideas and its need for security of critical information and systems. Washington University's guidelines call for respectful and responsible use of its computer networks to protect the rights of individuals and to warn against actions that may violate the law, such as the use of copyrighted, deceptive, defamatory, or obscene materials. The guidelines also state how critical security is to the University's physical network, computer operating systems, and application programs. Members of the University community are required to follow these guidelines. Additional information for matters pertaining to the Danforth Campus Schools or the Central Fiscal Unit can be obtained from Chris Shull, Chief Information Security Officer, at 314-747-2955. For matters pertaining to the School of Medicine, additional information can be obtained from Joe Susai, WUSM Executive Director & Chief Information Security Officer, at 314-273-4733. Refer to the website for more information: https://informationsecurity.wustl.edu/policies/

Confidentiality

Washington University maintains confidential records for a variety of business needs. Records include detailed information about patients receiving treatment, students, job applicants, employees, finances, and future planning. Many records such as medical records and student records must be kept confidential as a matter of federal and state law.

Members of the University community are expected to protect this information by safeguarding it when in use, storing it properly when not in use, and discussing it only with those who have a legitimate business need to know. Community members who are uncertain about the use of University records and information should contact their supervisors. Refer to the following websites for more information: https://hr.wustl.edu/ and https://hr.wustl.edu/policies/

Conflict of interest policies

The University and its community members are responsible for guarding against conflicts of interest that might compromise the integrity and objectivity of the

University community. The University as a whole, and the School of Medicine, both have conflict of interest policies.

Community members should familiarize themselves with these policies and disclose conflicts of interest as required by the policies. Additional information may be obtained from the following:

Research - Vice Chancellor for Research at (314) 747-0515.

Clinical care and physician relationships with drug and medical equipment or device companies Vice Chancellor for Clinical Affairs at (314) 362-6249.

Procurement - Director of Resource Management at (314) 935-5024.

Refer to the following websites for more information:

- https://coi.wustl.edu/policies/
- https://research.wustl.edu/institutional-conflict-of-interest-policy/
- https://research.wustl.edu/research-conflicts-interest-policy-guidelines/
- https://physicians.wustl.edu/for-patients/for-your-protection/
- https://physicians.wustl.edu/for-patients/for-your-protection/policy-on-pharmaceutical-and-medical-device-industry-relationship/
- https://wustl.edu/about/compliance-policies/human-resource-policies/procurement-conflict-interest/

Environmental health and safety

Washington University must comply with government rules and regulations that protect the environment and promote workplace safety. The University must operate its facilities with all of the necessary permits, approvals, and controls, especially with respect to handling and disposal of hazardous and regulated materials and waste. Anyone working with or around these materials must be familiar with the rules, regulations, and policies that apply to them.

The Environmental Health and Safety Office, (314) 362-6816, can provide assistance and answer questions. Refer to the website for more information: https://ehs.wustl.edu/

Export control

Washington University has a policy of open research that promotes academic freedom and the free exchange of ideas. Many international students, postdocs, and scholars work on campus, and international collaborations continue to grow. The University is also committed to compliance with federal laws that govern the transfer of controlled technology and information to foreign countries and to foreign nationals within the U.S., including the International Traffic in Arms Regulations

(ITAR), the Export Administration Regulations (EAR), and regulations administered by the Treasury Department's Office of Foreign Assets Control (OFAC) (collectively, "Export Control Laws"). Members of the University community must understand how Export Control Laws apply to their research, how to comply, and when to seek assistance. Export control support is available from the Export Control Manager at (314) 747-1378 or OVCRExportCompliance@wustl.edu. Refer to the website for more information: https://research.wustl.edu/topics/export-controls/

Family Educational Rights & Privacy Act (FERPA)

FERPA is a federal law that protects the privacy of student education records and gives individual students certain rights. For questions, contact the University Registrar at (314) 935-5959. Refer to the website for more information: https://registrar.wustl.edu/student-records/ferpa-privacy/

Foreign Corrupt Practices Act

The Foreign Corrupt Practices Act (FCPA) imposes certain restrictions on international transactions and activities. Of particular note is its broad prohibition on improper payments to foreign government officials, a category that includes employees of many foreign universities. The University's Office of the Executive Vice Chancellor and General Counsel provides training sessions to school leaders and CFU department personnel who may be involved with international activities. For training needs, contact the Assistant Vice Chancellor & Associate General Counsel at (314) 362-9071. For questions regarding international transactions and compliance with Foreign Corrupt Practices Act provisions, contact the Associate Vice Chancellor for Finance & Controller at (314) 935-9853. The University's international policies and resources can be found at the following website: https://global.wustl.edu/international-policies-resources/

HIPAA (Health Insurance Portability and Accountability Act)

Privacy and Security: Washington University is committed to conducting business in compliance with national standards for privacy, security, and electronic transactions of Protected Health Information. Members of the University community are expected to follow the University's HIPAA policies and procedures. Additional information can be obtained from the HIPAA Privacy Office at (314) 747-4975; hipaa@wustl.edu; Joe Susai, WUSM Chief Information Security Officer, at (314) 273-4733 for HIPAA security matters pertaining to the School of Medicine; or from Chris Shull, Chief Information Security Officer, at (314) 747- 2955 for HIPAA security matters pertaining to the Danforth Campus Schools or the Central Fiscal Unit. Refer to the following websites for more information: https://hipaa.wustl.edu/ and https://informationsecurity.wustl.edu/

Human resources-related matters including equal employment, harassment, etc.
Washington University is committed to a work environment free of harassment and disruptive behavior, and to an equal opportunity work environment where every member of the University community is treated with fairness, dignity, and respect. The University does not discriminate in access to, or treatment or employment in, its programs and activities on the basis of race, color, age, religion, gender, sexual orientation, gender identity or expression, national origin, veteran status, disability or genetic information. All members of the University community, especially supervisors, must be familiar with laws, regulations, and policies related to employment matters. Some of the relevant University policies on employment matters include (1) the policy against harassment, including sexual harassment; (2) the Washington University School of Medicine Policy against Abusive Conduct; (3) the Policy on Equal Opportunity; and (4) the Federal False Claims Act. Assistance is available from the Office of Human Resources at (314) 935-2332. Refer to the following website for more information: https://hr.wustl.edu/

Minors at WU or participating in WU programs/Reporting suspected child abuse, neglect or inappropriate interactions with minors
The purpose of these policies regarding minors is to: 1) provide for appropriate supervision of minors (children under the age of 18) participating in activities and programs taking place on Washington University property, in University owned or managed facilities, and under the exclusive authority and direction of the University in other locations, and 2) require immediate reporting of any instances or suspected instances of child abuse or inappropriate interactions with minors to law enforcement and to the University's Human Resources Office. If you see or suspect something that you think may be inappropriate, immediately contact one of the following:

- Washington University Police Department (314) 935-2772
- Washington University School of Medicine Protective Services Department (314) 362-4357
- Vice Chancellor for Human Resources (314) 935-7746
- Washington University Compliance Hotline (314) 362-4998 - reports can be made anonymously.

By virtue of your job/role, you may also have a responsibility to notify the Missouri Child Abuse and Neglect Hotline at 1-(800) 392-3738. For a complete list of individuals with that responsibility, refer to https://www.revisor.mo.gov/main/OneSection.aspx?section=210.115&bid=35615&hl=

In addition, refer to the following websites for more information: https://youthprotection.wustl.edu/ and https://youthprotection.wustl.edu/policy/

Physician and professional medical billing and medical record documentation

The University has a Policy on Compliance with Physician Billing Regulations and a Physician Billing Compliance Office. All faculty and staff who have any involvement in the documentation, coding, and/or billing of professional medical services must be familiar with this policy and its related regulations (including the Federal False Claims Act). Compliance support is available from the Physician Billing Compliance Office at (314) 747-7661. Refer to the following websites for more information: https://sites.wustl.edu/opbc/ and https://universitycompliance.wustl.edu/policies/false-claims-laws/

Research integrity

In the course of their work, community members engaged in research may encounter situations that raise questions about the integrity of research practices, assemblage of data, and/or publication of such data. The Research Integrity Policy addresses the procedures for allegations of misconduct in research, which is defined as fabrication, falsification, or plagiarism in proposing, conducting, or reviewing research, or in reporting results. Misconduct in research also includes violations of federal and institutional rules and regulations governing the conduct of research involving human subjects. Additional information may be obtained from the Vice Chancellor for Research at (314) 747-0515. Refer to the following website for more information: https://research.wustl.edu/washington-university-research-integrity-policy/

Sponsored research grants and contracts

Washington University receives grants and contracts from federal and non-federal sources. Faculty and staff who are involved in federally sponsored research must follow federal rules and regulations related to that work. Failure to observe government rules and regulations can result in the loss of funds from grants and contracts, and, in some instances, civil fines and criminal penalties. With respect to grants and contracts from non-federal sources, the University expects compliance with their requirements. Compliance support is available from the Assistant Vice Chancellor for Research Integrity & Ethics at (314) 747-4152 or the Associate Vice Chancellor for Finance & Sponsored Projects at (314) 935-7089. Refer to the following website for more information: https://financialservices.wustl.edu/wfin-topic/sponsored-projects-accounting/

University documents and record retention

Every member of the University community is responsible, within the scope of their own work, for the integrity and accuracy of the University's documents and records. No one may falsify or improperly alter information on any record or document. University documents and records are retained in accordance with the law and the University's record retention policies.

Additional assistance is available from the University's Accounting Department, (314) 935-4562, and the Physician Billing Compliance Office, (314) 747-7661. Refer to the following website for more information: https://financialservices.wustl.edu/wfin-topic/other/records-management-retention/

Workplace health and safety

Washington University seeks a healthy and safe environment for all members of the University community and for visitors. Every community member is obligated to perform their job in a safe manner and to follow all safety rules and procedures. Community members should immediately report any hazardous conditions or job-related illness or injury to their supervisors. Assistance is available from the Environmental Health & Safety Department at (314) 362-6816. Refer to the following website for more information: https://ehs.wustl.edu/

2. Who is subject to the Code of Conduct?

The first paragraph of the Statement of General Principles answers this question; for example, faculty, staff, alumni, volunteers, members of the Board of Trustees, and its committees.

Students are not subject to this Code of Conduct unless they are employed by the University or represent it. Several schools have policies that pertain to student behavior. Deans' offices are the best source of information about these policies. Students may be covered by other University policies depending on their circumstances.

3. Why does Washington University need a Code of Conduct?

A Code of Conduct is a restatement of the guidelines we believe members of the University community are already following. Many activities within the University have de facto codes of conduct, even though they might not be called by this name; the University's policies concerning research integrity and conflict of interest are two examples.

The University Code of Conduct complements and reinforces these existing statements. It does not replace them. Many other organizations and universities have codes of conduct. Finally, the federal government expects organizations that are subject to its laws and regulations and that receive federal funding to have written codes of conduct.

4. How will my daily work be affected by the Code of Conduct?

Your daily work should not be changed. You should already be following the principles in the Code of Conduct.

5. How will you know whether all members of the University community have received a copy of the Code of Conduct?

All current members of the University community have received or will receive a copy of the Code of Conduct. New faculty and staff will receive the Code of Conduct during their orientation process. Additionally, all faculty and staff receive the Code of Conduct annually, requesting them to certify that they understand it and agree to comply with it.

6. If I am involved in purchasing decisions, may I accept gifts or favors from vendors even if I am confident that these gifts or favors have no influence on my purchasing decisions or recommendations?

In general, no. Even if you are confident that your decisions or recommendations are not influenced by gifts or favors from vendors, the appearance of influence can be as important as its reality. Financial gifts or favors are never permitted. Gifts or favors in kind may be accepted if their value is incidental. Additional information regarding procurement issues may be obtained from the Director of Resource Management at (314) 935-5024. Refer to the following website for more information: https://wustl.edu/about/compliance-policies/human-resource-policies/procurement-conflict-interest/

7. Research faculty members complete conflict of interest disclosures annually. What is the requirement for other faculty and staff employees?

All faculty with Instructor or above appointments complete conflict of interest disclosures annually. Other faculty members and staff members should report potential or actual conflicts of interest to their immediate supervisors. Supervisors decide whether a conflict of interest exists. Refer to: https://wustl.edu/about/compliance-policies/governance/officers-staff-conflict-interest-policy/ and section 4 of https://research.wustl.edu/research-conflicts-interest-policy-guidelines/?_ga=2.164334713.730181266.1636565563-464064322.1632769158

8. Will I get into trouble if I report what I believe is a potential violation of the Code of Conduct and then the incident is judged not to be a violation?

No, as long as you sincerely believe a violation may have occurred. If you aren't sure whether a violation has occurred, you can discuss your concerns with any of the individuals listed above in the "How to Report a Violation or Discuss a Concern" in the Procedures for Reporting Violations or Concerns.

9. Will I be penalized if I witness a violation of the Code of Conduct and I report it even though my supervisor tells me not to report it?

No. Any such directions by a supervisor are not authorized by the University. The University encourages you to report any violations of which you are aware. Washington University does not tolerate retaliation and takes disciplinary action if retaliation occurs.

10. I do not want my supervisor to know that I'm reporting a potential Code of Conduct violation. Can I do so anonymously?

Yes. A telephone contact has been established in the University Compliance Office, (314) 362-4998. All incoming calls are anonymous, unless the caller wishes to leave identifying information to help facilitate follow-up. This telephone line does not have caller ID or any indication of where the call is coming from. In addition, other existing contacts for specific activities are listed in the Code of Conduct. You may request anonymity when calling them.

You may also access an online form on the Code of Conduct website that can be used to report violations or concerns which can also be anonymous.

11. If I believe a violation has occurred but I don't report it, what could happen to me?

It depends on the severity of the violation, the certainty you have about the violation, and your position of responsibility. A final decision would be based on the individual facts and circumstances of each case. Obviously, the University is not well served if violations are not brought to the attention of those in a position to address them.

12. Who will investigate reported potential violations?

The University Compliance Office, the Office of the Vice Chancellor & General Counsel, or other offices will investigate potential violations to the extent they have the expertise to do so. Others with specific expertise will become involved as appropriate and necessary.

13. Who determines the appropriate disciplinary action for violations?

The decision will be made in consultation with the Office of the Vice Chancellor & General Counsel, the Office of Human Resources on the appropriate campus, the University Compliance Office, and other individuals and offices as appropriate.

14. How much will I have to be involved in the investigations if I report a potential violation?

Your involvement depends on the complexity of the issue reported. The more information you are able to provide, the easier the matter will be to investigate. Once you report a violation, your future involvement would likely be limited to follow-up questions from the University Compliance Office or other offices.

15. Will I be informed of the resolution of potential violations that I report?

All violation reports and the results of the subsequent investigations will be held in confidence and will be disclosed only on a need-to-know basis. In some instances the reporting party may receive feedback following the completion of the investigation. During the investigation, the University will protect the privacy of both the persons who report violations as well as those individuals against whom allegations are made.