MD Anderson’s Standards of Conduct:

Do the Right Thing

The University of Texas
MD Anderson Cancer Center
Making Cancer History
Mission
The Mission of MD Anderson’s Institutional Compliance Program is to support MD Anderson’s Mission, Vision, and Core Values and to help the Institution fulfill its responsibilities to the people of Texas in an environment based upon ethical behavior and compliance with applicable laws, rules, and guidelines. To that end, the Institutional Compliance Program will provide all MD Anderson workforce members with the most accurate, concise, and up-to-date information and advice to assure that they are aware of their responsibilities with respect to sustaining such an environment. The Institutional Compliance Program will also continually assess the effectiveness and quality of the program to assure that all MD Anderson business is conducted with integrity and in compliance with the law.

Program
Consistent with its commitment to excellence, MD Anderson has developed a comprehensive compliance program designed to continuously monitor its high-risk areas and ever-changing federal and state statutes, regulations, and health care program requirements. MD Anderson’s Institutional Compliance Program was developed in response to federal guidance and The University of Texas System standards to address compliance with state and federal requirements. Our program is based on the elements of an effective compliance program identified by the U. S. Sentencing Commission and the U. S. Department of Health and Human Services Office of Inspector General to include:

- A compliance officer and compliance committees.
- Compliance plans and policies.
• A system for detecting and addressing compliance concerns.
• Hotlines and other lines of communication.
• Training and education.

The Institutional Compliance Program consists of the Chief Compliance Officer, the Deputy Chief Compliance Officer, the Executive Institutional Compliance Committee, as well as other compliance committees, the Institutional Compliance Office, and MD Anderson’s compliance plans.

MD Anderson’s Institutional Compliance Office addresses general compliance issues, as well as issues related to ethics and research compliance, billing and reimbursement compliance, privacy compliance, and corporate compliance. In addition, the Institutional Compliance Office responds to reported compliance concerns and those identified through ongoing auditing and monitoring activities. The Institutional Compliance Office maintains two hotlines that workforce members may use to report compliance concerns on a confidential basis. Such requests may also be made on an anonymous basis. In order to maintain MD Anderson’s culture of compliance and achieve its Mission, the Institutional Compliance Office provides all workforce members with regularly scheduled and specifically requested trainings on state and federal legal and regulatory matters, as well as Institutional Policies and Procedures.

For more information regarding MD Anderson’s compliance plans and the Institutional Compliance Program, see MD Anderson’s Handbook of Operating Procedures or the Institutional Compliance Office intranet page at: http://inside.mdanderson.org/departments/institutional-compliance/.
Contact Information

Contact Numbers
Phone: 713-745-6636
Fax: 713-563-4324
Via the Page Operator: 713-792-7090
Fraud and Abuse Hotline: 1-800-789-4448
Privacy Hotline: 1-888-337-7497

E-mail
Institutional_Compliance@mdanderson.org

Intranet Site
http://inside.mdanderson.org/departments/institutional-compliance/

Office

Mailing Address
Institutional Compliance Office - Unit 1640
The University of Texas
MD Anderson Cancer Center
P.O. Box 301407
Houston, TX 77230-1407

Location
Institutional Compliance Office
7007 Bertner Ave.,
Suite 1MC6.3427
Houston, TX 77030
### Mandatory Trainings
- Compliance Orientation (Includes HIPAA Privacy Training).
- Billing Compliance Education.
- Effort Reporting Training.

### Other Trainings
The Institutional Compliance Office also provides specialized training on general compliance, privacy and HIPAA, billing documentation, and other compliance topics. These trainings are provided upon request, based upon a need identified by the department or by the Institutional Compliance Office, or to provide information about new and emerging compliance issues.

**Contact number** (713) 745-6636

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### Who must complete the mandatory trainings?
- **Compliance Orientation (Includes HIPAA Privacy Training)**
  All newly hired or appointed: classified employees, faculty, clinical non-physicians, non-clinical trainees, physician trainees and students (except School of Health Sciences students who have attended annual student orientation), interns, nursing student externs, international nursing trainees, and observers.

- **Billing Compliance Education**
  All physicians (including faculty, fellows, and full-time residents), certified registered nurse anesthetists, advanced practice nurses, physician assistants, and other individuals who bill for patient care services.

- **Effort Reporting Training**
  All effort coordinators, department administrators, faculty members who have salaries paid from sponsored projects and/or effort allocated to sponsored projects, and certain non-faculty members who fall within the definition of Primary Individual as set forth in the institutional Effort Certification Policy (Policy # ACA0016).

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### Principle 1
Maintain a working knowledge of, and adhere to, both the letter and spirit of all applicable local, state, and federal laws, rules, and guidelines, as well as The University of Texas System and MD Anderson rules, policies, procedures, and compliance plans.

### Principle 2
Conduct all activities in accordance with the ethical standards of all applicable professional organizations and all dealings, including financial and accounting matters, in accordance with high standards of business and ethical conduct.