

 UTHealth Houston

Standards of Conduct Guide

Excellence Through Ethical Standards



Standards of Conduct Guide

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Our Mission

The mission of UTHealth Houston is to educate health science professionals, discover and translate advances in the biomedical and social sciences, and model the best practices in clinical care and public health.

We pursue this mission in order to advance the quality of human life by enhancing the diagnosis, treatment, and prevention of disease and injury as well as promoting individual health and community well-being.

Our Vision

Excellence above all in the quest to be an acknowledged leader in the collaboration to treat, cure, and prevent the most common diseases of our time through education, research, and clinical practice.

To Whom Do These Standards Apply?

HOOP Policy 109 and this Guide (“Standards of Conduct”) apply to all University employees, volunteers, and certain third parties. This includes but is not limited to:

- Administrators
- Faculty
- Staff
- Residents
- Postdoctoral research fellows
- Clinical fellows
- Volunteers
- Faculty appointed without salary
- Third parties within University control
- Visitors within University control
- Contractors
- Vendors
- Consultants
- Observers

Please note that [HOOP Policy 186, Student Conduct and Discipline](#), contains the related student standards. Students accepted, enrolled, registered, or with continued enrollment in the University are not covered by HOOP Policy 109, but are covered by HOOP 186, Student Conduct and Discipline. Students with employment appointments are covered by this policy when acting within the scope of their employment; however, they are covered by HOOP 186, Student Conduct and Discipline, when acting within the scope of their student status.

TIP: If you are unsure which policy should apply within specific circumstances, please contact Compliance@uth.tmc.edu.

Why Are Our Standards of Conduct Important?

We are each responsible for behaving ethically and for following the policies, laws, and regulations that apply to the University. This is what it means to be *in compliance*. Compliance includes adhering to:

- Federal, state, and local laws;
- Regulations, policies, and procedures;
- The University of Texas System (“UT System”) policies, the Rules and Regulations of the UT System Board of Regents; and
- The University Handbook of Operating Procedures (“HOOP”).

We demonstrate ethical behavior in how we perform our functions. While our Standards of Conduct do not cover every situation or regulation, they provide a framework for how to think and behave ethically in our daily work.

Our Standards of Conduct also reinforce our success within the University’s framework for ensuring compliance and expectations:



TIP: “Internal Controls” are put into place by departments and teams to improve operations, increase efficiency, and reduce risk. They consist of specific mechanisms such as policies, procedures, reconciliations, reviews, workflows, manuals, protocols, etc. They should be documented!

Following our Standards of Conduct is critically important because of the impact and consequences of the failure to do so. The potential impact and consequences include, but are not limited to:

- | | | | |
|--------------------|-----------------------|-------------------------------------|----------------------------|
| » Increased stress | » Negative reputation | » No sense of satisfaction | » Legal consequences |
| » Turnover | » Loss of credibility | » Health and safety loss | » Criminal penalties |
| » Trauma | » Poor communication | » Low morale/performance | » Civil penalties |
| » Lack of trust | » Blaming behavior | » Policy violation findings | » Disciplinary action |
| » Toxicity | » Increased risk/cost | » Loss of educational opportunities | » Impact to patient safety |
| » Dysfunction | » Unresolved conflict | » Termination/dismissal/nonrenewal | » Failure in purpose |

Please refer to the following policies for additional, related information:

- [HOOP Policy 44, Faculty Reappointment and Non-Reappointment](#)
- [HOOP Policy 133, Faculty Termination](#)
- [HOOP Policy 153, Termination of Employment: Administrative and Professional](#)
- [HOOP Policy 187, Discipline and Dismissal of Classified Employees](#)
- Residents and fellows should also refer to the [Graduate Medical Education Resources and Handbook](#).

How Do We Uphold Our Standards?

We are required to uphold the highest legal and ethical standards in fulfilling our job duties and participating in activities involving the University. We do this through our actions and conduct, which are rooted in the choices and decisions we make.

Ethical Decision-Making:

Exercise good judgment, care, and consideration. When responding to an issue, you should consider the following basic, ethical questions:

- » *Is there a potential threat or risk to life, health, environment, or safety?*
- » *Is it acceptable under the applicable laws and regulations?*
- » *Is it reasonable, correct, fair, and honest?*
- » *Can it be ethically justified?*
- » *Assume it can be made public—how would it appear in the public eye?*
- » *Is it in line with our University's Standards of Conduct?*

If you remain unsure about any of the Ethical Decision-Making questions, additional steps include:

- Reviewing the University HOOP online at www.uth.edu/HOOP.
- Discussing the issue with your direct supervisor or department leadership.
- Seeking guidance on specific ethical or compliance issues by contacting the Office of Institutional Compliance at 713-500-3294 or Compliance@uth.tmc.edu.

Another important part of upholding our Standards of Conduct includes focusing on ethical standards; specifically: Professionalism, Ethics, Integrity, and Accountability. Some non-exhaustive examples include:

Professionalism:

- Giving others the benefit of the doubt.
- Contributing to a positive and constructive environment.
- Being fit for duty during working hours, which includes on-call responsibilities.
- Recognizing others' contributions and actively listening to others.
- Participating in job-related education and training required to perform job duties.
- Exercising particular care in relationships of unequal authority:
 - » Supervisor/Subordinate
 - » Faculty/Student
 - » Health care professional/Staff/Patient
 - » Leader/Team
 - » Any other position with authority or responsibility for evaluation or decision-making

Ethics:

- Demonstrating civility within conduct and communications.
- Ensuring an environment free from harassment, discrimination, or retaliation.
- Timely completing required compliance training and understanding its content.
- Reviewing, understanding, and complying with University policies and Standards of Conduct.
- Respecting everyone's right to bring forward good faith complaints or concerns.
- Avoiding arrangements or circumstances that could create a conflict, create appearance of a conflict, or impair independent judgment.
- Promptly reporting suspected violations, including suspected impairment of others or safety hazards.

Integrity:

- Promoting health, safety, and inclusiveness in the workplace.
- Performing duties in an impartial manner and treating others equally, fairly, and consistently.
- Maintaining accurate and reliable records within scope of responsibility.
- Protecting private, sensitive, confidential, and proprietary information.
- Communicating with respect for others.
- Protecting and preserving University resources.

Accountability:

- Owning errors and opportunities for improvement.
- Acknowledging that failure to know policies is not a valid reason for noncompliance.
- Recognizing the University's right and responsibility to take disciplinary action when appropriate.
- Early conflict resolution at the lowest level of intervention first by seeking guidance as needed, and willingly participating and cooperating in any informal process.
- Understanding that false reports and retaliatory behaviors are strictly prohibited.
- Knowing that managers and leaders set departmental tone for ethics, culture, and compliance.

TIP:

- *"Professionalism" relates to the conduct and behavior of an employee.*
- *"Ethics" are the moral principles that govern a person's behavior.*
- *"Integrity" is adhering to moral and ethical principles, including honesty.*
- *"Accountability" means having an obligation or willingness to accept responsibility for one's actions.*

What Is Important to Know About Reporting Complaints or Concerns?**Types of Concerns:**

Your concerns are important. For certain types of complaints, there is a specific office to contact and policies to follow when you are considering formalizing a report:

Type	Policy	Contact
Criminal Activity	HOOP 87	The University of Texas Police – Houston (UT Police)
Employee Grievances	HOOP 146	Human Resources, Employee Relations (HR-ER)
Faculty Grievances	HOOP 127	Office of Chief Academic Officer (OCAO)
Discrimination and Harassment	HOOP 183	University Relations and Equal Opportunity (UREO)
Sexual Harassment and Sexual Misconduct	HOOP 59	Title IX Office (Title IX)
Retaliation	HOOP 108	Office of Institutional Compliance (OIC)
Research Misconduct	HOOP 202	Research Integrity Officer (RIO)

TIP: *The Employee Grievance policy covers complaints concerning wages, hours of work, working conditions, performance evaluations, merit raises, job assignments, reprimands, or the interpretation or application of a rule, regulation, or policy. It does not cover complaints from employees regarding suspension without pay, demotion, or termination of employment due to disciplinary action. Those are covered by separate policies.*

Reporting Paths:

There are several ways to report suspected misconduct or noncompliance activities:

- Make a report through the normal administrative channels (i.e., report concerns to the appropriate supervisor). The recipient of such a report is obligated to relay the reported information to any responsible office or authority.
- Make a report to the Chief Compliance Officer or other staff member in the Office of Institutional Compliance (OIC), either by letter or email.
- Make a report through the designated UTHealth Houston Compliance email address: Compliance@uth.tmc.edu.
- Make a report through the [Compliance Hotline](https://go.uth.edu/compliance-hotline): English or Spanish speaking in USA and Canada (800-846-0632) go.uth.edu/compliance-hotline.
- Make a report via an exit interview statement given through Human Resources upon the conclusion of employment at the University *and* request contact back from Human Resources.

Pre-Complaint Consultation:

For those types of complaints with specific policies and complaint processes to follow, you may contact OIC for a pre-complaint consultation if you:

- Want to know your options under applicable policy;
- Have questions about the process; or
- Are not sure if you want to formalize your concerns within a specific type of complaint.

TIP: Faculty members seeking supportive resources or an informal discussion may also contact the [Office of Faculty Affairs and Development](#) or the Faculty Affairs Office within each school.

Retaliation Concerns:

If you are unsure about filing a complaint because the circumstances have not yet materialized into retaliation, yet you still have the fear of retaliation, you should take the following actions:

- Seek guidance, as needed, to identify any potential opportunities to communicate directly regarding your concerns and resolve conflict at the lowest level possible.
- Review [HOOP Policy 108, Protection from Retaliation](#), in detail.
- Be prepared to document detailed notes about each concerning incident that you believe may implicate retaliation and why.
- Be prepared to retain the notes about each incident and any related records in a secure location.
- If you later decide to seek a pre-complaint consultation or file a complaint, you will have the supportive information needed, should perceived retaliation incidents occur.

Compliance Hotline:

The Office of Institutional Compliance (OIC) is responsible for reviewing reports submitted to the [Compliance Hotline](#): English or Spanish speaking in USA and Canada (800-846-0632); go.uth.edu/compliance-hotline. When communicating about making a formal complaint or otherwise reporting concerns, you can expect OIC to provide you with next-step guidance under University policies. Other related information about Compliance Hotline reports includes:

- **Anonymous Reporting Option via the Compliance Hotline:** You can report anonymously to the Compliance Hotline. Important things to know are:
 - » You can log back into the Compliance Hotline system using the Report ID and password you receive.
 - » When logged into the Compliance Hotline system, you can:
 - Send and receive messages with OIC;
 - Receive and review policies from OIC; and
 - Attach and send records to OIC.
 - » If, after making an anonymous report, you identify yourself to OIC, you may still request anonymity.

- **OIC's Process for Reviewing Reports:** OIC reviews each report to determine:
 - » Which University policies apply, if any;
 - » What the next steps are;
 - » Whether more information is needed from you; or
 - » Whether there is a specific office or person responsible for addressing your concerns.

- **Your Responsibility for Reporting Compliance Concerns:** OIC's ability to review a report depends upon the amount of detail provided. Include as much information as possible.
 - » OIC will ask for more information when it is needed to facilitate the review.
 - » If OIC does not receive the information needed, OIC may close the report.
 - » If OIC closes a report due to a lack of information, you may still submit information directly to Compliance@uth.tmc.edu or file a new report.
 - » You may ask OIC any questions you have, at any time.

- **Compliance Investigations:** Compliance investigations will be conducted when:
 - » Sufficient information has been provided to support the allegations;
 - » Applicable policies require investigation; and
 - » A compliance issue is identified for which an investigation is needed.

TIP: Submit as much information as possible: dates, times, locations, departments, documents, accounts, policies, names, activities, etc. At minimum, detail about each incident involved should include:

- What happened?
- Where?
- When?
- Who was there to witness the incident? (identified by full name when known)
- Submit or identify any related records. (Microsoft Office files, videos, pictures, and PDFs)

Employee Assistance Programs (EAP):

Navigating sensitive issues can present challenges for any individual. As such, when dealing with stressful conditions, it is important to know that the University offers and encourages a variety of supportive resources through EAP. All EAP services are private, not a part of your employment record, and are completely confidential. This means that EAP will not release any information regarding your contact with EAP without your written consent or as required by law. More information regarding EAP's services is available online at: inside.uth.edu/eap/employee-assistance/index.htm.

University Ombuds Office:

The [University Ombuds Office](#) is a confidential, informal, independent, and neutral place to discuss concerns, resolve disputes, manage conflicts, and increase skills regarding communication, negotiation, and problem-solving. The ombuds may serve as an intermediary, mediator, facilitator, coach, or simply as a listener. Another function is to make recommendations for the general improvement of UTHealth Houston and provide feedback on trends, issues, policies, practices, and procedures while maintaining and protecting the confidentiality of visitors. Communication with the ombuds is not considered official notice to the University, nor does it replace any formal reporting channels, like formal complaints or grievances in accordance with applicable policies. The ombuds is neutral, and therefore does not serve as an advocate for any individual or entity.

Which Other Policies and Standards Are Related to These Standards of Conduct?

This table provides a selection of related policies and is not exhaustive. The HOOP may be searched using keywords and indexing, and policies listed herein will contain related, cross-reference to other policies.

Topic	Description	Related Policies or Guidance	Requirements or Examples (Non-Exhaustive) ¹
Accuracy of Records	Employees of the University are responsible for maintaining the integrity and accuracy of University business documents and records for which they are responsible.	Texas Penal Code §37.10	Employees may not alter or falsify information on any University record or document. Example: if you issued a record and later realize numbers need correction, to preserve integrity, reissue the document and indicate the revisions.
Alcohol	Use or possession of alcohol at work, on University business, participating in University-related activities, or while in vehicles used for University business is prohibited. External use that may adversely affect others' safety is prohibited.	HOOP 173 ; HOOP 9	Policy violations may be subject to disciplinary action. While the University discourages serving alcohol at most University events, alcoholic beverages may be served at selected, University-sponsored events if advance permission is requested and approved. Request submissions should be coordinated through the Office of Institutional Compliance at UTHealthERM@uth.tmc.edu .
Billing Compliance	Compliance with laws and regulations governing billing for hospital and physician or other billing provider services.	Billing Compliance Overview ; Medical School Healthcare Billing Compliance	Billing must be based on accurate documentation. Examples of violations include billing for services not rendered, not documented, or not medically necessary, and duplicate billing.
Billing Compliance and Reporting	Obligation to report suspected billing violations, fraud, waste, or abuse.	Compliance Hotline ; Reporting to U.S. Department of Health and Human Services Office of the Inspector General ; Reporting to Texas State Auditor's Office	Any suspected violation of local, state, or federal laws, regulations, or policy—including the False Claims Act or state equivalent—must be reported.
Computer Information Security	Computer passwords must not be disclosed to anyone. Furthermore, passwords should not be written or otherwise documented in a place that is accessible by others.	Information Security Services ; IT Security Policy ITPOL-002 ; IT Security Policy ITPOL-017 ; UT System Policy UTS 165	Sharing your password is a policy violation. Report general computing and security incidents to the Chief Information Security Officer. Contact your supervisor, your IT support staff, or the Office of Information Technology Services at 713-486-2219; itcompliance@uth.tmc.edu for further assistance.
Computer Software	Software installed on University-owned computers is licensed for specific uses and purposes. None may be copied unless authorized by the software licensor.	HOOP 180 IT Security Policy ITPOL-018	Copying University-licensed software on a personal device is not permitted, unless expressly authorized by license agreement. For example, copying software for a co-worker is not permitted. For questions, contact your supervisor, your IT support staff, or the Office of Information Technology Services at 713-486-2219; itcompliance@uth.tmc.edu .

¹ Any suspected violations must be reported.

Topic	Description	Related Policies or Guidance	Requirements or Examples (Non-Exhaustive) ²
Conflict of Interest and/or Commitment	A conflict of interest is when an individual's personal interests – family, friendships, financial, social, or other factors – could compromise their judgment or ability to carry out job duties.	HOOP 20 ; HOOP 94 ; HOOP 221 ; UT System Policy UTS 180 ; UT System Regents' Rule 30104 ; Conflict of Interest Disclosures ; Outside Activities Request Form ; HOOP 20 Decision Matrix	Conflict of interest examples include a vendor offer of personal benefits to an employee; anything of value being offered to secure University business; employees receiving royalties from works purchased with University funds; cash gifts in exchange for University favor; vendor-paid lunches appearing to influence; personal/familial relationships with vendors that could reasonably appear to or actually influence an employee's performance of duties; etc.
Contacts with the Media	The Office of Public Affairs acts as the official spokesperson for the University.	HOOP 5	Direct all media to the Media Relations Hotline. Any contact from journalists must be referred immediately to the Media Relations Hotline at 713-500-3030.
Contracts and Agreements	Only individuals expressly authorized in writing by the University President may enter into contracts or agreements, either oral or written, on behalf of the University.	HOOP 124 ; UT System Regents' Rule 20901	An impermissible example is signing a contract with a restaurant for a department event without official authority. Contact the Office of Legal Affairs at 713-500-3268 for a list of authorized persons who may enter into contracts or agreements.
Criminal Activity	UT Police at Houston provides a systems approach to threat, risk, harm, and resilience. UT Police also collects specified information on campus crime statistics and security measures.	HOOP 87	The UT Police Risk Operations Center operates 24 hours a day, seven days a week. Call 911 for emergencies or any imminent threat requiring police response. Call 713-792-2890 for non-emergencies.
Criminal Background Checks	The University conducts criminal background checks in certain instances.	HOOP 160	Falsifying information or failing to disclose information as required by policy will be subject to appropriate disciplinary action, up to and including termination.
Discrimination, Harassment, and Equal Opportunity	The University is committed to providing equal opportunity in all working and learning activities without regard to any protected status.	HOOP 183 ; University and Equal Opportunity (UREO) Discrimination and Harassment	Protected statuses include race, color, religion, sex (including pregnancy), gender, sexual orientation, national origin, age, disability, genetic information, gender identity or expression, veteran status, or any other basis protected by law. Prompt reporting of violations is required.
Drug-Free and Violence-Free Workplace	The University prohibits unlawful purchase, manufacture, distribution, possession, selling, storing, or using of a controlled substance, in or on University-owned or controlled property. Possession of weapons is strictly prohibited except as permitted by state law.	HOOP 173 ; HOOP 222 ; HOOP 39	A policy violation may be subject to disciplinary action, up to and including termination or dismissal. An employee may also be referred to Employee Assistance Programs. A student may be referred to Student Health and Counseling Services. Any employee convicted of a drug-related offense occurring on University property must notify Human Resources – Employee Relations within five calendar days of the conviction.
Ethical Standards	The University is a state institution of higher education; our employees are public servants for which the State of Texas and the UT System Board of Regents have specific ethical standards that apply.	Texas Ethics Commission Guide for State Employees ; UT System Administration Standards of Conduct	State ethics rules have restrictions on benefits, gifts, and honoraria; use of government resources; conflicts of interest; acceptance of benefits; bribery; abuse of office; other employment; personal financial statements; and gifts.

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Topic	Description	Related Policies or Guidance	Requirements or Examples (Non-Exhaustive) ³
Family and Medical Leave	Family Medical Leave provides leave for serious health conditions for the employee; to care for a spouse, child, or parent with a serious health condition; or for certain situations and health conditions involving a family member’s military service. It also provides leave for the birth, adoption, or foster placement of a child.	HOOP 106 ; Note: The University has other types of leave programs and pools for which employees should consult with Human Resources.	Eligibility requires state agency employment for the past 12 months and at least 1,250 hours worked at UTH-H. A maximum of 12 work weeks during a 12-month period is available. A maximum of 26 work weeks during a 12-month period for employees caring for a covered servicemember is available. Other types of leave programs and pools may have other qualifications and criteria. Employees should consult with an Employee Relations Advisor in HR at 713-500-3130 and applicable policies.
Federal False Claims Act (31 U.S.C. §§ 3729-3733)	Prohibits knowingly submitting or causing submission of false or fraudulent claims for payment to the U.S. government, including Medicare or other federally funded health care programs. This law prevents the U.S. government from paying fraudulent claims.	Medicare Fraud and Abuse: Prevent, Detect, Report	Examples: billing for procedures or services not performed; falsifying or altering medical records or documentation; authorizing or submitting duplicate or inflated billing; misrepresenting services to receive higher reimbursement; authorizing or submitting claims for medically unnecessary services; or falsifying claims forms to get overpayment. Anyone who submits false claims may be subject to civil penalties up to \$5,000 per claim and assessments of twice the claimed amount. UTH-H prohibits such conduct and enforces internal controls to prevent, detect, and report such violations.
Fraud, Waste, and Abuse	Gaining unauthorized benefit by deception, misrepresentation, waste, or misuse of resources. Fraud includes gaining a benefit that does not belong to the individual and would be in violation of policies and laws.	UT System Policy UTS 118 ; Reporting Violations	Examples: deception for financial or personal gain; false representation of fact; false statements or falsification of records; concealment of material facts; thoughtless or careless expenditure; mismanagement or abuse of resources; unnecessary costs from inefficiencies or ineffective practices, systems, or controls; excessive or improper use of university property or resources; or using something contrary to rules for use.
Gifts, Gratuities, and Items of Value	Employees cannot accept gifts that might reasonably influence carrying out their job duties. Report suspected violations.	HOOP 226 ; HOOP 119 ; UT System Policy UTS 171	Do not accept gifts from people affected by your official discretion; e.g., tickets to entertainment or sporting events; paid expenses for a trip; acceptance or solicitation of any gift, favor, or service with intent or appearance of influence; or student loan lender gifts.
Government Agency or Other External Investigations	The University is committed to cooperating with government or other regulatory investigations of the University and its employees.	HOOP 147 ; HOOP 109	Legal processes include, but are not limited to, receiving a subpoena, inquiry, or other legal document, and require immediate notification to the Office of Legal Affairs at Subpoena@uth.tmc.edu . The Office of Institutional Compliance should be notified of investigations involving a University community member being conducted by affiliate partners (MD Anderson, Health and Human Services, etc.) at Compliance@uth.tmc.edu .

³ Any suspected violations must be reported.

Topic	Description	Related Policies or Guidance	Requirements or Examples (Non-Exhaustive) ⁴
Honoraria	Employees may not accept an honorarium for performing services that they would have not been asked to provide but for their official status. An honorarium is a gratuitous monetary payment or any other item of value for the person’s participation in a usual academic activity for which no fee is legally required. Employees must comply with prior approval and financial disclosure as applicable.	HOOP 20 ; HOOP 20 Decision Matrix	An impermissible example includes when the head of an administrative department is invited to speak at conference because of their position, and then is offered an honorarium. Other examples include a guest lecture or presentation; a cultural performance; presentation of research papers; or participation in or leading colloquiums, workshops, or seminars.
Information or Records Requests	The Texas Public Information Act specifies requirements for disclosure and nondisclosure of all documents, records, data, and other information in University possession or control.	HOOP 132	If you receive a request for information or records from an external (non-University) person or entity, and the request is not authorized by an existing procedure or practice, you should immediately forward the request to the Office of Legal Affairs at tpia@uth.tmc.edu .
Intellectual Property	Intellectual property (IP) includes any invention, discovery, trade secret, technology, scientific or technological development, computer software, or other form of tangible expression. IP is protected by patent, trademark or copyright laws, or protected by not disclosing the information. IP created within the course and scope of employment must be disclosed to the Office of Technology Management.	UT System Regents’ Rule 90101 ; HOOP 201	IP developed in the course and scope of University employment or resulting from activities performed on UT System time, or with support of State funds, or from using UT System’s or its universities’ owned facilities or resources are automatically owned by the Board of Regents. For more information, contact the Office of Technology Management (OTM) at 713-500-3369 or www.uth.edu/otm/ . OTM has information on patent protection for an invention or discovery and the University’s royalty distribution policy. An example of when to contact OTM is before a manuscript submission to a scientific journal on a development that may be patentable.
Outside Employment, Board Service or Compensation	Every employee’s primary duty is to their position at the University. Employees must comply with prior approval, financial disclosure, and management plans as applicable.	HOOP 20 ; Conflict of Interest Disclosures ; Outside Activities Request Form ; HOOP 20 Decision Matrix	Examples of outside activities include moonlighting at another organization; paid/unpaid consultative or advisory services; or any form of employment, business relationship, or activity involving the provision of services, whether paid or unpaid.
Overtime Pay and Compensated Time Off	Federal and state laws govern the payment of wages and hours worked, and require compliance with both laws and applicable policies.	HOOP 154 ; HOOP 24	Employees must have supervisor approval before working overtime. Applicable laws also require accurate records, budget responsibility, and accurate timekeeping.

⁴ Any suspected violations must be reported.

Topic	Description	Related Policies or Guidance	Requirements or Examples (Non-Exhaustive) ⁵
Patient Privacy	These laws ensure privacy to protect patient rights and promote effective communication between health care provider and patient. There are specific uses and disclosures of Protected Health Information with a standard of disclosing the minimum amount necessary.	HOOP 206 ; HIPAA Policies ; Notice of Privacy Practices	Protected Health Information (PHI) includes, but is not limited to, communications about patients; patient record handling throughout clinical processes; and technology and data containing patient information (e.g., email safety and encryption). Contact Privacy@uth.tmc.edu immediately about concerns.
Personal Investments	Employees may not make personal investments that could reasonably be expected to create or give appearance of a conflict. Employees must comply with prior approval, financial disclosure, and management plans as applicable.	HOOP 20 ; Conflict of Interest Disclosures ; Outside Activities Request ; HOOP 20 Decision Matrix	Substantial direct/indirect financial interests examples include, but are not limited to, substantial ownership of stock; interest in a business; participation in decision-making concerning the business; or any ownership interest in an ambulatory surgery center.
Political Activities and Political Contributions	University policy outlines circumstances in which employees may participate in political activities. Political contributions from any source of University funds are prohibited.	HOOP 38	Limited participation is permitted when activities are not during work hours unless on absence time; comply with law; do not interfere with job duties; do not impermissibly use UT System nor University resources nor facilities; do not coerce others; and do not involve UT System nor the University in partisan politics. Impermissible examples include emailing co-workers about a campaign or bringing campaign information to a staff meeting to share.
Prohibited Diversity, Equity, and Inclusion Initiatives	An employee or contractor who engages in conduct in violation of Texas Education Code § 51.3525(b)(1) is subject to disciplinary action up to and including termination.	Texas Education Code § 51.3525	An employee or contractor may not: (A) establish or maintain a diversity, equity, and inclusion office; (B) hire or assign an employee of the institution or contract with a third party to perform the duties of a diversity, equity, and inclusion office; (C) compel, require, induce, or solicit any person to provide a diversity, equity, and inclusion statement or give preferential consideration to any person based on the provision of a diversity, equity, and inclusion statement; (D) give preference on the basis of race, sex, color, ethnicity, or national origin to an applicant for employment, an employee, or a participant in any function of the institution; or (E) require as a condition of enrolling at the institution or performing any institution function any person to participate in diversity, equity, and inclusion training, except under certain circumstances. Contact the Office of Legal Affairs at 713-500-3268 for guidance.

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Topic	Description	Related Policies or Guidance	Requirements or Examples (Non-Exhaustive) ⁶
Purchases of Items, Goods, or Services	Employees may not use University funds for any purchase unless authorized to make the purchase in accordance with policy.	HOOP 124 ; UT System Regents' Rule 10501	Purchases must comply with all applicable purchasing procedures. An impermissible example includes purchasing furniture at a store for a department, and then seeking reimbursement. Purchases over a certain amount must be placed for bid and include historically underutilized vendors. Contact Procurement Services for more information at 713-500-4700.
Record Retention and Disposal	State law requires an active and continuing records management program for vital and confidential records in order to ensure appropriate retention and disposition of records.	HOOP 181	Tampering with records, or removing or destroying them, except in accordance with the approved retention and disposition policy, is prohibited. Contact Records Management Department at 713-500-8508 or 713-500-8123.
Research Integrity	The highest ethical research standards are required. Fabrication, falsification, plagiarism, or other deviation from commonly accepted research practices are prohibited.	HOOP 202 ; Procedures for Allegations of Research Misconduct ; Clinical Trials Resource Center ; Office of Research	There are required standards that apply to scientific integrity, human subjects, research animals, data management, and authorship. Report observed, suspected, or apparent research misconduct to the Research Integrity Officer: 713-500-3082; www.uth.edu/research/ .
Self-Dealing / Transactions with Employees	Employees may not officially transact business with any entity in which they have an interest or involvement.	HOOP 126 ; UT System Policy UTS 118 ; Reporting Violations	This relates to purchases of any supplies, materials, services, equipment, or property. Purchases must be approved and made only if the cost is less than other known sources. Sales to employees must follow Capital Asset Management guidelines.
Sensitive Information	Sensitive information must be protected with all safeguards available and must not be shared with anyone without a legitimate business need to know. In particular, social security numbers have specific policy requirements.	HOOP 102 ; HOOP 129 ; HOOP 129-Appendix A ; HOOP 175 ; IT Security Policy ITPOL-023 ; UT System Policy UTS 165	Examples of sensitive and private information include, but are not limited to, personnel data (e.g., employment application information); Social Security number; student information (e.g., grades posted with Social Security numbers); patient information; research data; financial data; proprietary information; strategic plans; marketing strategies; employee lists and data; protected activity information; supplier and subcontractor information; and proprietary computer software.
Sexual Harassment and Sexual Misconduct	The University is committed to maintaining a learning and working environment that is free from discrimination based on sex.	HOOP 59	As defined in HOOP Policy 59, Sexual Misconduct is a broad term that encompasses sex discrimination, sexual harassment, sexual assault, domestic violence, dating violence, stalking, and other inappropriate sexual conduct. Responsible employees are required to report as directed in HOOP Policy 59.

⁶ Any suspected violations must be reported.

Topic	Description	Related Policies or Guidance	Requirements or Examples (Non-Exhaustive) ⁷
Technology	Under the technology policy, limited use of University Information Resources for personal purposes is permitted as outlined by the policy.	HOOP 180 ; IT Security Policy ITPOL-019	Permissible examples include personal use that does not result in cost to the University; does not interfere with job duties; is brief; does not disrupt nor distract; and does not compromise security or privacy. Specific examples of permissible use include a child calling their parent's work phone number; brief occasional personal email; or access to otherwise blocked web sites after successful certification of legitimate work purpose. Unacceptable uses include conducting outside business; political campaigning; illegal activities; or supporting, promoting, or soliciting for an external entity without advance approval.
Texas False Claims Act	The Texas law is similar to the federal law preventing payment of false and fraudulent claims.	False Claims and Whistleblowing	False claims examples include misrepresentations to obtain money or property; direct/indirect actions causing unnecessary costs; billing for equipment not received nor returned; or false information misleading into joining a plan.
Time and Leave Records	Applicable laws and policies require accurate recordkeeping.	HOOP 24	All employees must submit records reflecting hours absent from work and, for hourly salaried and nonexempt employees, their actual hours worked.
Tobacco-Free Environment	The University is committed to a tobacco-free environment for those who enter University-owned or leased properties.	HOOP 10	The use of tobacco is not permitted on the premises or grounds of the University. Failure to comply with this policy may result in disciplinary action, up to and including dismissal or termination.
Use of Copyrighted Material	Copyright protects original works of authorship and restricts their use. To reproduce materials, you must have the owner's or copyright holder's permission. It is best to assume that most books, magazines, and other materials are copyrighted and are prohibited from being copied and used or distributed.	HOOP 47 ; Copyright Guidelines	Faculty members should review the Copyright Guidelines and contact the Office of Legal Affairs with questions at 713-500-3268, Legal@uth.tmc.edu , or inside.uth.edu/legal/contact-us.htm .
Use of University and State of Texas Resources	Each employee is responsible for protecting and preserving University property, equipment and supplies. Public resources cannot be used for personal benefit or gain.	HOOP 84 ; Texas Ethics Commission	Conservation of state resources is a responsibility that University employees, as state employees, hold as trustees for the citizens of the State of Texas.

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Topic	Description	Related Policies or Guidance	Requirements or Examples (Non-Exhaustive) ⁸
Whistleblower Protections	Whistleblower protection laws, including the False Claims Act and state equivalents, allow individuals to report suspected violations and protect them from retaliation when they report in good faith or participate in related investigations.	UT System Policy UTS 118 ; HOOP 108 ; False Claims and Whistleblowing ; Medicare Fraud and Abuse: Prevent, Detect, Report; Reporting Violations	Reports may be made through: (1) supervisor (must escalate), (2) Office of Institutional Compliance (OIC) via letter or email Compliance@uth.tmc.edu , (3) Hotline: 800-846-0632 / https://go.uth.edu/compliance-hotline , (4) exit survey with follow-up request. UTH-H includes anti-retaliation language in HOOP 108 and ethical standards in HOOP 109. OIC delivers required training on fraud, waste, and abuse—including whistleblower protections—through: New Provider Orientation (NPO), New Employee and Annual Compliance Training, and OIC receives, evaluates, and acts on all compliance reports.
Working Conditions	A safe and healthy workplace environment depends upon each employee resolving problems early with the lowest level of intervention, and escalating as necessary based upon applicable policy.	HOOP 146 ; HOOP 127 ; HOOP 228	Examples of working conditions can include, but are not limited to, wages, hours of work, performance evaluations, merit raises, job assignments, reprimands, actions of supervisors, workload, workspace, or the interpretation or application of a rule, regulation, or policy.
Workplace and Environmental Health and Safety	The University works to create and maintain a safe and secure environment and to be prepared for emergencies.	HOOP 89 ; HOOP 90 ; HOOP 86	Every individual must ensure their work environment is safe and that proper procedures are followed for handling and disposal of potentially hazardous materials. Every individual must also immediately alert a supervisor or instructor and the Safety, Health, Environment, and Risk Management (SHERM) office if any injury or situation presenting danger of injury is present. Main Office: 713-500-8100 (Monday-Friday, 8:00 a.m.-5:00 p.m.); Hotline: 713-500-5832 (after hours, weekends, holidays for the on-call safety specialist); and for emergencies, call UT Police Dispatch 713-792-2890 or 911.

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Additional Resources

Websites maintained by UT System and government entities and agencies, listed below, contain helpful information.

- [UTHealth Houston Handbook of Operating Procedures](#)
- [Graduate Medical Education Resources and Handbook](#)
- [UT System Regents' Rules and Regulations](#)
- [The University of Texas Systemwide Policies](#)
- [Texas Ethics Commission](#)
- [Texas Health and Human Services](#)
- [U.S. Department of Education's Office for Civil Rights](#)
- [A Guide to Ethics Laws for State Officers and Employees](#)
- [Centers for Medicare & Medicaid Services](#)