

Mayo Clinic Integrity and Compliance Program



**“I would admonish
you, above all
considerations,
to be honest.
I mean honesty
in every conception
of the word:
let it enter into
all the details
of your work...”**

*Dr. William J. Mayo
1920*

Honesty and ethical behavior have always played an important role in the work of Mayo Clinic. Because ethical behavior is a part of Mayo culture, we practice mutual respect, protect patient information, deal honestly with other businesses and obey the law.

This tradition of integrity serves us well and is one of the reasons for our continued success. In the Integrity and Compliance Program, Mayo Clinic has formalized that tradition to ensure its preservation.

Because ethical behavior and compliance are the responsibility of every Mayo Clinic staff member, this booklet is provided to you as a resource. It offers an overview of the Integrity and Compliance Program and the Compliance Office. Please keep this booklet and refer to it when you have questions about any part of the Integrity and Compliance Program.

A handwritten signature in black ink that reads "Denis A. Cortese". The signature is written in a cursive style with a large initial 'D' and 'C'.

Denis A. Cortese, M.D.
President and CEO
Mayo Foundation

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Integrity and Compliance Program Overview

What is it?

Mayo Clinic created the Integrity and Compliance Program to reinforce Mayo's commitment to conducting its business with integrity. When people behave with integrity, they act honestly, sincerely, ethically, morally and legally.

The Integrity and Compliance Program places all policies and procedures related to ethical conduct and compliance under one umbrella program. This gives Mayo Clinic a way to communicate standards of ethical conduct to staff, outside businesses and the general public.

The program is designed to educate staff about the current health care environment, to make staff aware of the complexities of regulatory requirements and to provide resources to assist staff in complying with those requirements.

The Mayo Clinic Integrity and Compliance Program consists of two parts: a Code of Conduct and a Compliance Office. The Code of Conduct is a formal statement of Mayo's standards and rules of ethical business conduct. The Foundation Compliance Office oversees the program, acts as a resource for questions and concerns and works with department and division chairs, local compliance

officers, physician leaders and appropriate committees to ensure compliance with the Code of Conduct. The Compliance Office is also available to receive any and all reports of suspected violation of Mayo policy or applicable laws and regulations. Every suspected violation reported to the Compliance Office, either directly or through the Compliance Hot Line, will be thoroughly investigated.

As always, the Legal Department also is available to assist with concerns and staff questions about how to comply with legal requirements.

Why does Mayo need an Integrity and Compliance Program?

Mayo needs this program for the following reasons:

- To provide a formal statement of Mayo's standards and rules of ethical conduct to all Mayo staff and business partners.
- To inform staff about existing laws, future laws as they are enacted and Mayo Clinic policies.
- To protect Mayo Clinic and its staff from legal action should a breach of ethical conduct occur.

Mayo is committed to maintaining a culture that promotes the prevention, detection and resolution of instances of conduct that do not conform to laws, regulations, Mayo policy or the Mayo Clinic Code of Conduct. The Compliance Office and Code of Conduct assist with meeting this commitment.

Does the Mayo Clinic Integrity and Compliance Program apply to me?

The Integrity and Compliance Program applies to everyone: Mayo Foundation trustees, officers, staff who work at all Mayo entities, and people who do business with Mayo. It sets the ethical tone for work conducted at Mayo. No person's job or position at Mayo is more important than preserving Mayo's reputation for integrity.

Compliance is everyone's responsibility.

- All Mayo staff are expected to follow the standards described in the Code of Conduct.
- All Mayo staffs have a responsibility to, in good faith, report known or suspected violation of Mayo policy or applicable law or regulation.
- All staffs are expected to participate in annual Compliance Program training.
- All staffs, who honestly and in good faith report suspected wrongdoing, will be protected from retaliation.

Mayo Clinic Code of Conduct

What is the Mayo Code of Conduct?

The Code of Conduct is a key part of Mayo's Integrity and Compliance Program. It is a formal statement of Mayo's standards and rules of ethical business conduct.

There are nine areas of conduct covered in the code:

1. Ethics
2. Confidential information and trade secrets
3. Conflict of interest and outside activities
4. Use of Mayo funds and assets
5. Working with suppliers and referring providers
6. Books and records
7. Political activity and contributions
8. Safety, health and environment
9. Employee relations

What if I need more information about the Code of Conduct?

The Code of Conduct cannot anticipate every circumstance staff members may encounter.

If you have questions or need advice about a specific situation, talk to your supervisor, administrator, department or division chair, or appropriate physician leader or call the Compliance Office.

If you suspect a violation of the Code of Conduct or applicable law or regulation, share your suspicion with your supervisor, administrator, division or department chair or the Compliance Office. If you feel more comfortable speaking with someone else, you can call the

Compliance Hot Line at 888-721-5391.

All reports are handled confidentially and, at your request, may be handled anonymously as well.

Ethics

Mayo Clinic's policy is to conform with the law. However, where the law may be permissive or lenient, Mayo Clinic will always choose the course of honesty and integrity.

Mayo cares how outcomes are obtained, not just that they are obtained. This ethical principle applies to all Mayo Clinic staff, trustees and officers, and all companies doing business with Mayo.

Honesty is expected in all aspects of a staff member's work. This includes patient

care, records and bookkeeping, budget proposals and any financial-effect analysis of a project.

What should I do to follow this policy?

- If staffs have questions about ethics and ethical behavior, they should seek clarification from their supervisor or the Compliance Office.
- Staffs should make every effort to ensure accuracy of accounting books and records, including medical records.
- Staffs should be honest with each other. They also should be honest and forthcoming with internal and external auditors.

Confidential Information and Trade Secrets

Mayo patient records must be kept confidential in accordance with Mayo policies and applicable laws.

All staff must safeguard Mayo's confidential information and trade secrets. This includes refusing improper access to the confidential information and trade secrets of any other company, including Mayo competitors.

Confidential and trade secret information includes any information that is not generally disclosed to the public. This information frequently describes proposed Mayo actions that would be useful or helpful to Mayo's competitors. The following examples identify confidential information:

- Employee wage and salary data
- Patient medical and billing records (Such records are confidential and are released only in accordance with Mayo policy and applicable laws.)
- Certain financial data
- Planned new projects
- Capital investment plans and projected earnings
- Changes in management or policies of Mayo

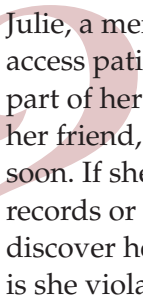
If staffs have questions about whether information is confidential, they should ask their supervisor, administrator, or contact the Compliance Office or Legal Department.

Guidelines for disclosing proprietary information

- Discuss restricted or exclusive information with others only on a need-to-know basis.
- Provide private Mayo information only with the advice of the Legal Department, using appropriate disclosure agreements.
- Be cautious about accidentally discussing confidential Mayo information or trade secrets in social conversations or in normal business relations.

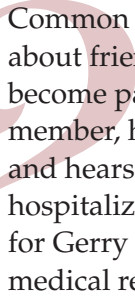
**Confidentiality
Test your knowledge ...**

Read through the scenarios and check your answers against those provided.



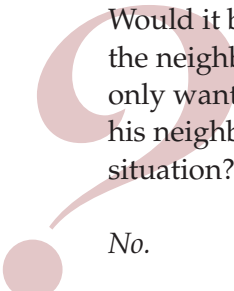
Julie, a member of the Mayo staff, can access patient registration information as part of her job responsibilities. She knows her friend, Carol, will be having a birthday soon. If she accesses Julie's employment records or medical records simply to discover her birthday, age or her address, is she violating confidentiality?

Yes. It is never proper conduct for a staff member to access personal information about co-workers, friends or relatives when doing so is not part of his or her job.



Common curiosity makes people wonder about friends, family and neighbors who become patients at Mayo. Gerry, a staff member, has access to patient records and hears that a neighbor has been hospitalized. Would it be proper conduct for Gerry to look up his neighbor's medical records to learn more about the diagnosis?

No, that would be a breach of confidentiality.



Would it be any more ethical to look up the neighbor's medical records if Gerry only wanted to reassure himself that his neighbor wasn't in a life-threatening situation?

No.

It is never ethical or proper to look in a patient's confidential record unless it is required as part of your job.

Any breach of patient confidentiality may result in termination of employment.

Conflict of Interest

A conflict of interest may occur if a Mayo employee's outside activities and personal financial interests or other personal activities influence or appear to influence his or her ability to make objective decisions in the course of the individual's job responsibilities.

Mayo staffs are expected to avoid situations where their personal interests could conflict with Mayo interests. Any situation where a staff member may benefit financially as a result of his or her position with Mayo (except from normal salary) is a potential conflict of interest. Examples of financial benefits that may constitute a conflict of interest include cash, gifts and travel.

How can I tell if I face a conflict of interest?

Will you see personal financial gain?

Staffs should avoid outside financial interests that influence their decision or actions as Mayo staff members. For instance, a staff member would face a conflict of interest if his or her spouse owned a company that does business with Mayo and he or she provided the spouse with information not available to the general public.

Here is another example. A physician with a significant investment in a medical device company that sells products to Mayo would face a conflict of interest if the physician only used devices from that company when other equal, and less expensive, devices were available. The opportunity for financial gain would appear to influence the physician's actions as a Mayo staff member, causing a conflict of interest with what is best for Mayo and Mayo patients.

Do outside activities influence your job at Mayo?

Staff should avoid outside employment or activities that would have a negative impact on their job performance or Mayo's reputation in the community.

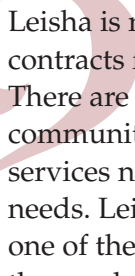
You can find more information and examples of conflict of interest on the Medical/Industry Relations Web site in the following policies:

- *Representing Mayo: Guidelines for Professional Relations, Industrial Relations, Publishing and Media Relations* (<http://mayoweb.mayo.edu/man-pgripm/>)

- *Conflict of Interest* (<http://mayoweb.mayo.edu/conflictinterest/>)
- *Industry Financial Disclosure* (<http://mayoweb.mayo.edu/man-pgripm/dc.html>)

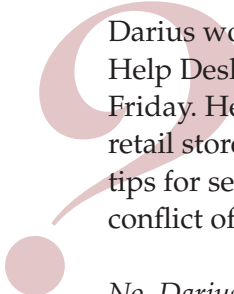
**Conflict of Interest
Test your knowledge ...**

Read through the scenarios and check your answers against those provided.



Leisha is responsible for negotiating contracts for Mayo's recycling program. There are currently three vendors in the community who provide the kinds of services needed to meet Mayo's recycling needs. Leisha's husband is part owner of one of the three vendors. If Leisha chooses the vendor in which her husband is a partner, is this a conflict of interest?

Yes. Leisha should not be the person making the contract decisions. Leisha should turn the bids from the three vendors over to another supervisor for review. By turning the bids over to another supervisor, and not having any involvement in the decision-making process, Leisha would minimize even the appearance of a conflict of interest.



Darius works at the Mayo Computer Help Desk from 8 to 5, Monday through Friday. He has taken a second job at a local retail store selling computers and offering tips for setting up home offices. Is this a conflict of interest?

No. Darius' second job is not in conflict with his work at Mayo as long as it does not interfere with his Mayo responsibilities.

Use of Mayo Funds and Assets

Mayo assets are to be used solely for the benefit of Mayo and **may not be used by staff or other Mayo representatives for personal gain.**

Assets are much more than equipment, inventory, funds and office supplies. Mayo's assets also include:

- Medical records
- Concepts
- Business strategies and plans
- Financial data
- Intellectual property rights

- Confidential information about Mayo activities
- Research data

Sale of Mayo property

The sale, donation or removal of Mayo Clinic products, equipment or materials must be authorized by Materials Management. Communication Technology Services can authorize for computers and peripherals only. Appropriate documentation of transactions is required (e.g., Property Control Form MC0772-02) to insure good accounting practice and compliance requirements for sales tax.

Working with Suppliers and Referring Providers

If your job involves working with businesses that supply Mayo with certain products and services, you may face situations that test your integrity.

Because relationships with suppliers and referring providers can pose a variety of ethical or even legal problems, additional guidelines have been developed to help you understand the boundaries of ethical conduct.

Kickbacks and rebates

A kickback or rebate (a gift/refund given in anticipation/payment of special favors) can take many forms and is not limited to cash payments or monetary credits. Any time a staff member or a staff member's family is offered something as a result of Mayo purchasing any product or service, the staff member should question both the ethics and the legality of the offer. In general, if a staff member can influence a business transaction and stands to gain from it, that transaction is prohibited, and in many cases illegal.

Reciprocity

In some instances, Mayo may purchase goods and services from a supplier who also buys goods and services from Mayo. However, any form of pressure for reciprocal business from a supplier is not ethical. Staffs should never ask a supplier to buy Mayo products in order to do business with Mayo.

Gifts or gratuities from businesses

In general, Mayo staffs may accept unsolicited, nonmonetary gifts from a business under the following circumstances:

- The gift is primarily for advertising or promoting a product or service and is less than \$50 in value.
- The gift is less than \$50 in value and will benefit patient care or is a textbook.

However, in some situations gifts from businesses are strictly prohibited. Under no circumstances may staffs accept money from companies or individuals doing business with Mayo. Also, it is unethical for staffs to ask businesses for personal gifts or favors.

Invitations from vendor, pharmaceutical or commercial representatives for any entertainment activity not included within the agenda of a genuine educational event should be declined. Examples of appropriate educational events include national meetings, Continuing Medical Education meetings and preapproved advisory board meetings.

Gifts that are valued at more than \$50 must be reported to the Compliance Office. Such gifts may be accepted if special circumstances exist. However, the Compliance Office is responsible for determining if the gifts may be kept, must be returned, or become Mayo property.

What should I do if a patient wishes to give me a gift?

Individuals wishing to present a gift to Mayo personnel should be referred to the Development Office. Gifts of substantial value that cannot be refused graciously should be delivered to Development by the recipient. All gifts of money must be turned over to Development.

What if the patient persists?

Some patients may insist on making a personal gift. In such cases, it may cause embarrassment to decline the gift. If the gift is small, it may be accepted and shared with co-workers, if possible (i.e., flowers or a box of candy). Gifts that cannot be shared (i.e., a necktie, gift certificate or bottle of wine) may be used for personal purposes.

Other gifts should be discussed with the Administrator, Medical/Industry Relations Office, the Compliance Office or Development. These are usually turned over to Development.

Hospitality

While doing business with vendors and suppliers, Mayo staffs often encounter circumstances related to hospitality, such as gifts of food or entertainment to the work unit. The Medical/Industry Relations Committee, using national standards, outlines the following for industry-provided food:

Industry-Provided Food Policy

A. Grants to offset the cost of modest refreshments may be solicited and accepted as follows with the grantor publicly acknowledged in every instance.

-
- For educational courses, meetings and presentations that are reviewed and accredited by an external entity or approved by the Medical/ Industry Relations Committee. If approved by an external entity, the meeting must provide CE, CNE or CME credits.

The grantor must be acknowledged publicly during the meeting. Industry displays may not occur in the same area as the course meeting or presentation, nor may they be placed in areas accessible by patients. Industry representatives may not be present or participate in meetings that involve internal personnel only

- For formal divisional meetings that have educational goals, such as divisional grand rounds and research presentations. Industry representatives may not be present or participate in meetings that involve internal personnel only.
- For formal conferences that are required to maintain accreditation for residency programs.
- For department-sponsored journal clubs on or off campus.*

* For all campus events, grants may be solicited from industry by departments for non-CME, informal journal clubs. There must be a bona fide educational component to the journal club.

- In conjunction with pharmaceutical display events on campus. No more than one pharmaceutical display event per week per Mayo campus. No displays can be placed in areas accessible by patients.

Departments will be required to maintain an annual accounting of all grants solicited and received for provision of refreshments, including name and date of the meeting or journal club activity, amount of the grant, and external accrediting body or designated conference. Random audits will be requested by the Medical/ Industry Relations Committee and shared with the local Board of Governors.

B. Grants should not be solicited from industry nor should industry provide food on or off a Mayo campus for the following:

- Division/department administrative meetings

- Employee social events
- Staff planning sessions or retreats

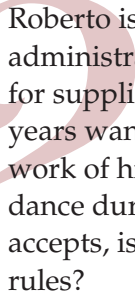
C. Individual industry representatives may not distribute food to any area, unit or person on the Mayo campus in conjunction with a sales call or as part of marketing or promotional activities. This is consistent with the PhRMA Code on Interactions with Healthcare Professionals adopted by the Pharmaceutical Research and Manufacturers of America in 2002.

**Gifts, Gratuities
and Hospitality
Test your knowledge ...**

Read through the scenarios and check your answers against those provided.


Audra is a Mayo Clinic nurse attending a national conference. She works in a clinic setting where over-the-counter medications are often suggested to patients for postoperative pain. At a pharmaceutical display she is offered a colorful and interesting desk set with the company's logo and trademarked medication prominently displayed. Can she accept the gift?

Yes, the gift is valued at under \$50 and is primarily for advertising. However, she should not display the article on a desk in a patient care area but may use it in her personal office space or at home.



Roberto is a Mayo department administrator who approves expenditures for supplies. A vendor he has used for years wants to help him reward the hard work of his staff and offers to host a dinner dance during the holidays. If Roberto accepts, is he violating the hospitality rules?

Yes, even if the vendor says there are no strings attached to his offer, accepting may appear to place subtle pressure on Roberto to continue his business relationship with the vendor.



Dr. Elliott is a Mayo physician. A former patient, a well-known artist, credits Dr. Elliott with saving his life and wants to express his thanks by giving her one of his paintings for her personal office. Can she accept the gift?

Maybe. Dr. Elliott should determine if she can decline the gift without causing a break in the relationship. She should contact Development to determine if she may keep and display the gift or must relinquish it, or she could suggest the patient contact Development him or herself to make the contribution.

Payments to agents, representatives and independent consultants

Any agreement with agents, sales representatives or independent consultants must be reasonable in amount, in the value of the service provided and in comparison to trade practices. Any agreement involving more than \$10,000 or for longer than one year must be in writing.

Payments to government employees

It is illegal to offer any government official or employee a payment of money, gifts, services, entertainment or anything else of value. Even if such payments are legal in other countries, they still may be violations of U.S. law. Before considering such an offer, staffs should get advice from the Legal Department or the Compliance Office.

Other improper payments

The use of Mayo funds or assets for any unlawful or unethical purpose is prohibited. It does not matter if payment is made directly or indirectly by Mayo staff or by a third party on behalf of Mayo.

Accounting Books and Records

Federal law requires Mayo to assure that its accounting books and records are accurate. It is against Mayo policy, and possibly illegal, for any person to knowingly cause Mayo books and records to inaccurately describe the true nature of a business transaction.

The following actions also are against Mayo policy:

- Making records appear as though payments were made to one person when they were made to another.
- Submitting expense accounts that do not accurately reflect expenses.
- Creating any other records which do not accurately reflect the true nature of transactions.
- Making false or artificial entries in Mayo books and records, or in any public record, for any reason.
- Altering in any way permanent entries in Mayo records.

Non-Mayo-funded social accounts or similar non-Mayo accounts cannot be maintained on Mayo books. Staff may not receive or make any payments on behalf of Mayo without fully understanding their purpose. The purpose also must be the same as described in the documents supporting the transaction.

Retention of records

Mayo records and files can only be destroyed or disposed of in accordance with the record retention and management policy. Laws and regulations describe how long certain records must be kept, particularly when the records involve taxes, personnel, health and safety, environmental issues, contracts and corporate areas.

It is also important to keep all records that may be involved in any government investigations, audits or legal action. Destroying such records before the matter is closed or destroying records so that they may not be used in legal proceedings is illegal.

For information about record management and retention, staffs are asked to refer to Mayo's Record Management and Retention Policy, accessible through the Compliance Office Web site, or contact the Legal Department.

Political Activity and Contributions

Mayo encourages all personnel to vote and be active in the political process. However, Mayo, as a tax-exempt entity, is prohibited from conducting political activities. This prohibition applies to all Mayo entities and is a condition of tax-exempt status under Internal Revenue Service (IRS) regulations. It also applies to activities of individual Mayo employees during work hours and any use of Mayo resources to distribute statements supporting or opposing any candidate. Personal political activity should not reference Mayo or the individual's position at Mayo. Accordingly, it is against Mayo policy, and may also be illegal, for personnel to:

- Include, directly or indirectly, any political contribution on your expense account or in any other way that causes Mayo to reimburse you for that expense. In general, the cost of fund-raising tickets for political functions is considered a political contribution. Therefore, including the cost of such a fund-raising dinner on an expense account, even if business is discussed, is against Mayo policy and possibly illegal.

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- Use any Mayo property or facilities, or time of any Mayo personnel, or use the Mayo intranet for any political activity. Examples of prohibited conduct include using a Mayo telephone to make politically motivated solicitations, allowing any candidate to use any Mayo facilities (such as meeting rooms) for political campaigning or loaning any Mayo property to anyone for use in connection with a political campaign.
 - Use Mayo's electronic mail service to communicate personal opinions. This includes other individuals, elected representatives, government agencies, newspapers, periodicals or other external organizations. Personal opinions might be construed as official Mayo policy, since the e-mail address includes the Mayo name and is visible to those receiving the e-mail.

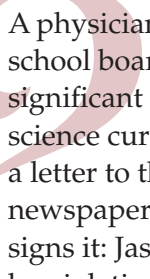
Individuals in leadership positions who participate in political activity must be aware that these activities carry the inherent risk of creating the appearance of a Mayo endorsement. Therefore, certain political activities must be avoided unless the individual takes appropriate actions that may include resigning the leadership position.

Mayo and other tax-exempt organizations are permitted to engage in limited lobbying activities; however, these activities are very limited and must be coordinated through the Department of Public Affairs, the Legal Department and Mayo leadership.

Because the political process has become highly regulated, employees should consult the Compliance Office before agreeing to do anything that could be construed as involving Mayo in any political activity at either the federal, state or local level, or in any foreign country.

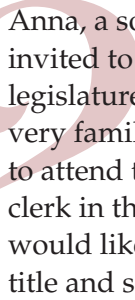
Political activity and contributions
Test your knowledge ...

Read through the scenarios and check your answers against those provided.



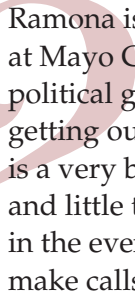
A physician has a keen interest in local school board issues. The possibility of a significant change in the high school's science curriculum prompts him to write a letter to the editor of the community newspaper. He writes a concise letter and signs it: Jason Jones, M.D., Mayo Clinic. Is he violating the Code of Conduct?

Yes. While it is appropriate for Dr. Jones to express his opinions, he should not include Mayo Clinic as his address. By using Mayo Clinic's name, rather than his home address, he has implicitly associated Mayo with his views.



Anna, a social service worker, has been invited to testify at a hearing at the state legislature on a topic with which she is very familiar. She schedules a vacation day to attend the hearing. At the state capitol, a clerk in the hearing room asks her how she would like to be introduced; she gives her title and says that she is with Mayo Clinic. She is announced with her name, title and employer's name. Is this a violation of the Code of Conduct?

Although Mayo encourages all employees to be active in politics, in this case, by using Mayo Clinic's name in her title, Anna has given the impression that she is at the hearing to represent Mayo instead of her personal views as a concerned citizen and informed professional. She should have spoken with her supervisor and Mayo's Public Affairs Committee about this opportunity before agreeing to give opinions that may have been construed as Mayo's official position. All employees should consult a member of the Public Affairs Committee about anything that could involve Mayo in political activity at either the federal, state or local level.



Ramona is an administrative assistant at Mayo Clinic and a member of a local political group. She is adamant about getting out the vote for her candidate. She is a very busy person with three children and little time to make phone calls at home in the evenings. Can she use her breaks to make calls to voters asking them to vote for her candidate without violating the Code of Conduct?

Yes. As long as Ramona uses her personal cell phone and her personal time to make the calls she will not violate the Code of Conduct. She may not, however, use Mayo's phone system, electronic mail system or any Mayo supplies to make her political appeal.

Safety, Health and Environment

An important goal at Mayo is to provide a safe and healthful workplace for staff, patients and visitors. Mayo also is concerned about protecting the environment and minimizing the impact of its operations on the land, air and water.

Policies have been developed to protect our patients and staff from potential

workplace hazards. Staffs need to be familiar with these policies. Mayo staffs have a responsibility to follow safe operating procedures, to safeguard their health as well as that of their co-workers and patients, and to maintain and use pollution control systems.

Federal, state and local agencies throughout the United States ensure that everyone complies with laws and regulations affecting safety, health and environmental protection. Mayo's policy is to comply with the laws and regulation of these agencies.

All staffs are expected to cooperate with government inspection and enforcement personnel. (Please see the Government Investigations policy on the Foundation Compliance Office Web site.) Mayo staffs also are expected to report to their supervisor, administrator, Safety Office or Compliance Office any conditions they believe are unsafe or hazardous.

Employee Relations

Mayo is committed to following all human rights laws of the United States government and of the state governments where staff reside.

Mayo's policy is to provide equal employment opportunities to all individuals who are qualified to perform job requirements, regardless of their race, color, gender, religion, national origin, disability or age. Mayo is committed to follow the various human rights laws of the United States and of the states where employees reside. Every employee has a right to work in an environment free of harassment or discrimination because of race, color, creed, religion, gender, age, national origin, marital status, sexual orientation, veteran's status, disability, or status with regard to public assistance.

Mayo relies on the integrity of its staff to treat each other with mutual respect, courtesy and fairness.

Mayo Compliance Office

What is the Compliance Office?

The Compliance Office is the Mayo Clinic group responsible for implementing the Integrity and Compliance Program.

To meet this goal, the Compliance Office provides training and information about the Code of Conduct, existing laws and newly enacted laws to Mayo staffs, business partners, vendors and people who work on behalf of Mayo. The Compliance Office also offers a variety of ways for staffs to ask questions or gain information concerning the Code of Conduct.

Reporting suspected violations or seeking compliance information

The Compliance Office operates a confidential, toll-free Compliance Hot Line and e-mail address for questions about compliance-related issues and the Code of Conduct.

**Suspected violation of applicable
law or regulation or violations of the
Code of Conduct can be
reported through:**

The toll free number

888-721-5391

OR

e-mail

compliance@mayo.edu

Either option is available 24 hours a day, every day of the year. Translators also are available. Trained professionals at an external company with Compliance Hot Line expertise will take calls and receive e-mails. If the caller wants to know if or how the problems was solved, a password will be given so the caller can check on the status of the complaint without giving his or her name.

Individuals who, in good faith, report violations will be protected from any form of retaliation.

The Compliance Office also maintains an intranet site as an informational resource for staff. Staff can visit the Compliance Office Web site at the following address:

<http://mayoweb/compliance-integrity/>

Disciplinary action

Staff who knowingly violate the Code of Conduct will be dealt with appropriately. Individuals who feel they have been unfairly disciplined may pursue an appeal in the manner described in their institutional policy book.

Compliance activities throughout Mayo Clinic

Compliance activities throughout Mayo Clinic are not new. Mayo's policy has always been to prevent unethical or unlawful behavior and to conform with federal, state and local laws. The standards used to shape the Integrity and Compliance Program have been part of Mayo's culture for years.

The following examples highlight just some of the many compliance-related activities throughout Mayo Clinic.

Many Mayo sites have safety committees responsible for overseeing compliance with safety-related rules and regulations, including those issued by the Nuclear Regulatory Commission and the Occupational Safety and Health Administration. Safety committees routinely manage policies and procedures related to hazardous waste disposal, security and environmental safety.

Medicare billing compliance

The health care regulatory environment has changed significantly over the past few years. Increasing emphasis has been placed on preventing Medicare fraud, abuse and waste. To this end, the federal government has initiated several audit and investigative initiatives aimed at detecting over-payments made by the government and false claims for payment submitted by health care providers.

Mayo also has dedicated considerable resources to ensuring compliance with Medicare rules and regulations. Multiple Mayo Clinic and Mayo Health System committees are charged with assuring Medicare compliance. For a summary of relevant rules and regulations, please see the Health Care Integrity appendix at:

<http://mayoweb.mayo.edu/sp-forms/mc2500-mc2599/mc2570-07.pdf>

In addition, specific work units are responsible for complying with Medicare billing and reimbursement laws and regulations.

Research compliance

Research is vital to Mayo's mission. It is Mayo's policy to comply with the rules and regulations associated with accepting extramural research funds.

Questions concerning these rules and regulations should be directed to Research Administration, the Institutional Review Board (IRB) or the Compliance Office.

Any suspected violation of research policy should be reported to one of the above or by calling the Compliance Hot Line.

For more information about compliance-related activities occurring throughout Mayo Clinic, including Medicare-related educational activities, staffs are asked to contact their local Compliance Office or the Mayo Foundation Compliance Office (see contact information on page #).

Conclusion

Mayo's reputation for high ethical standards is a key component that has contributed to its success. All staffs must conduct themselves in a manner consistent with those standards.

Each staff member plays a vital role in assuring that Mayo activities and endeavors are conducted ethically, honestly and with integrity.

Frequently asked questions

Why am I required to complete training in the Integrity and Compliance Program?

Mayo is committed to honest and ethical behavior. Staff training is an important tool to help you become more aware of your responsibilities and accountabilities by identifying proper conduct for doing business. Because of the complexity of the current health care environment, the Integrity and Compliance Program is designed to help staffs understand and comply with legal and ethical responsibilities to better protect them and Mayo.

Who works in the Compliance Office?

Each Mayo Clinic site has a Compliance Office staffed by a Compliance Officer. The following physicians serve as compliance administrators for Jacksonville, Rochester and Scottsdale:

Stephen J. Buskirk, M.D.

Mayo Clinic in Jacksonville

Glenn S. Forbes, M.D.

Mayo Clinic in Rochester

Daniel N. Wochos, M.D.

Mayo Clinic in Scottsdale

Staff associated with other Mayo entities should contact their supervisor or administrator for the name of their compliance administrator. These administrators also are listed on the Compliance Office Web site and in the Quarterly Directory.

The Mayo Foundation Compliance Committee oversees the Integrity and Compliance Program. Dr. Wochos chairs the committee. Greg Warner serves as committee secretary and is Director for Compliance for Mayo Foundation.

What happens if there is a suspected violation of the Code of Conduct?

The local Compliance Office, together with the appropriate department chair, division chair or physician leader, will look into the suspected violation.

Mayo has never intentionally set out to defraud anyone. When we have made and discovered honest mistakes, we have corrected them. Why do we need an Integrity and Compliance Program?

Abuse and fraud in health care can result in criminal prosecution, civil liability and administrative fines. The Integrity Program demonstrates Mayo's commitment to ethical behavior. Mayo does not interpret honest mistakes as fraud. It provides a means to discover mistakes early, correct them, and educate staff to prevent their reoccurrence.

Does the U.S. or state government encourage compliance programs?

Yes, the government would like the health care industry to adopt a model of self-compliance to prevent fraud and abuse.

May vendors or suppliers, such as sales representatives, bring pizza, donuts or other food to our work unit?

No. Please see the policy outlined on pages 15–17.

We do business with a company that wants to fly several of us to its company headquarters for a meeting. Is this allowed?

No, this travel arrangement should be refused because such arrangements may constitute a conflict of interest. Mayo's Code of Conduct requires all Mayo staff to avoid conflicts of interest or even the appearance of conflict of interest. If there are legitimate reasons to make such a trip, Mayo should pay the travel costs.

As a staff member, I receive my medical care here. Is my medical record kept confidential?

Yes, Mayo's Code of Conduct requires all staff to respect the confidentiality of patient information. Confidentiality standards are the same for each patient, whether the patient is a staff member, a local person or an international patient.

Many staff are required to access patient information as a part of their jobs.

Accessing patient information for any other reason may be grounds for discipline up to and including termination.

For more information or to report a suspected violation

All Mayo staffs are expected to comply with the Code of Conduct and Compliance Program. If you want to report a suspected violation of the Code, of applicable law or regulation, or simply want more information about the Code of Conduct, please do one of the following:

- Visit the Mayo Clinic Compliance Web site at <http://mayoweb/compliance-integrity/>.
- Talk to your supervisor, administrator, department chair, division chair or appropriate physician leader.

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- Contact the Compliance Office at your site.
 - Call the toll-free Compliance Hot Line at 888-721-5391.
 - Send an e-mail message to the Compliance Hot Line at compliance@mayo.edu.
 - Call the Mayo Foundation Director for Compliance, Greg Warner, at 507-284-9029.
 - Speak with a member of the Legal Department at 507-284-2650.



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