



USC University of
Southern California



INTEGRITY AND ACCOUNTABILITY CODE
AT OUR BEST - A SHARED COMMITMENT

enter here





USC Mission

The central mission of the University of Southern California is the development of human beings and society as a whole through the cultivation and enrichment of the human mind and spirit.

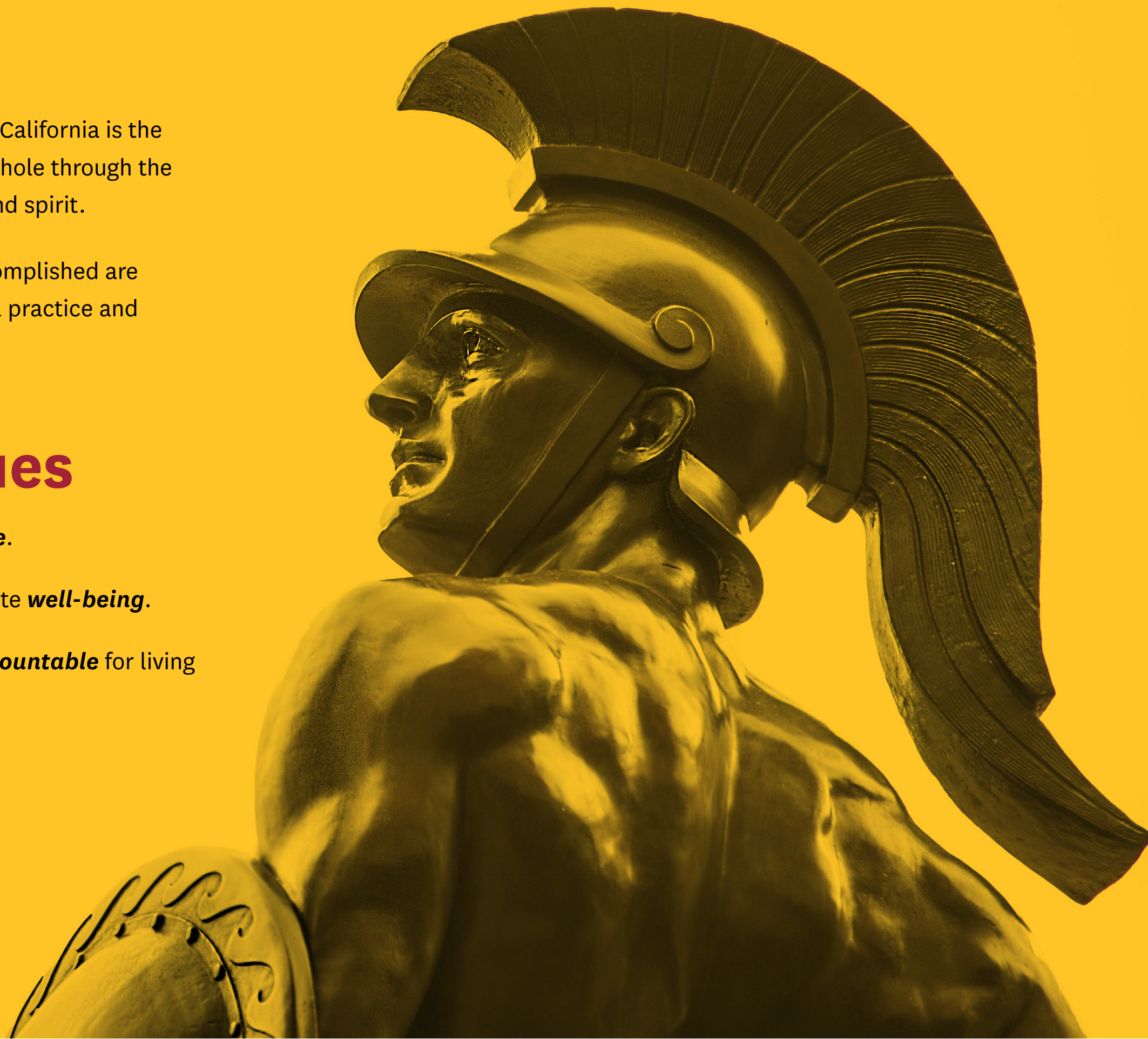
The principal means by which our mission is accomplished are teaching, research, artistic creation, professional practice and selected forms of public service.

USC Unifying Values

We act with ***integrity*** in the pursuit of ***excellence***.

We embrace ***our vibrant community*** and promote ***well-being***.

We engage in ***open communication*** and are ***accountable*** for living our Values.





Message from Interim President Beong-Soo Kim

Dear Trojan Community,

Our mission and values drive a shared commitment to community, unified around a common pursuit of academic and research excellence, creative practice, and the highest quality of medical care. I am proud that our university is a top destination for exceptional students, inspirational faculty, remarkable staff, healthcare providers and innovative researchers from around the world.

Each of us has an obligation to uphold USC's mission and values and ensure that our actions and decisions reflect our commitment to one another. Our Integrity and Accountability Code is anchored by our shared values and is designed as a resource to help guide you in making decisions that are ethical, consistent with professional responsibilities and standards, and comply with all applicable laws and regulations. It supports us in living out our values through our choices, our conduct, and how we engage and collaborate with one another.

I encourage you to read the Code, and to use it as a resource to inform and guide the work you do here at USC. Thank you for your continued dedication to cultivating an environment that reflects our shared values.

Sincerely,

Beong-Soo Kim

Interim President

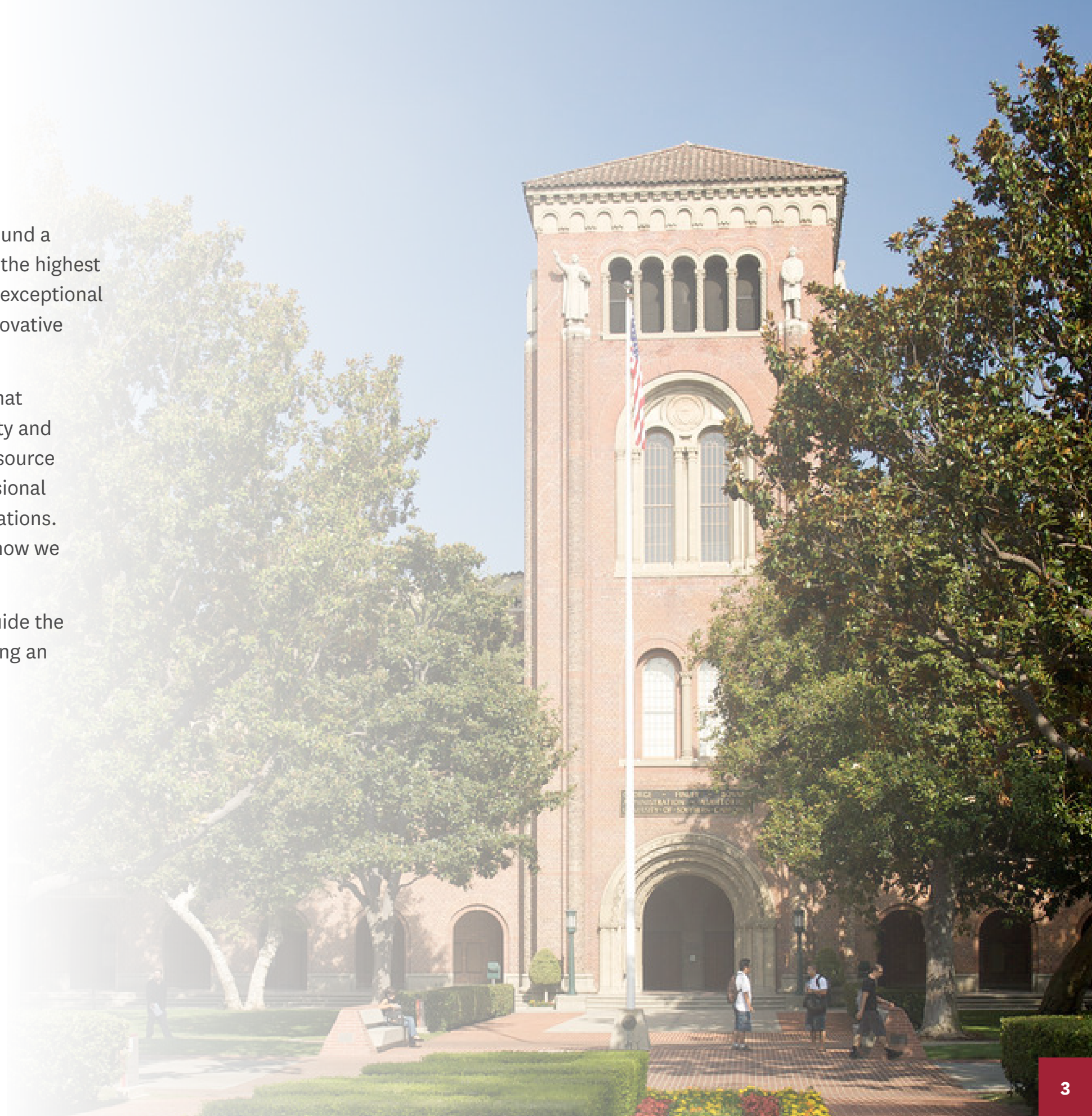




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Integrity

WE DO THE RIGHT THING

Our words, decisions and actions align with and are guided by our values, honesty and ethical principles.

In This Section:

Our Culture

Promoting Our Mission and Living Our Values

Our Code

Setting Expectations and Guiding Our Decisions and Actions

Our Responsibilities

Meeting Our Shared Obligations

Our Voice

Asking Questions and Sharing Concerns

Research and Scholarly Integrity





Our Culture — Promoting Our Mission and Living Our Values

At USC, our culture is defined first and foremost by what we do — ***we serve our students, patients and communities, through enrichment of mind, body and spirit, in the pursuit of excellence.***

How we achieve our mission is equally important and also defines our culture — ***How we achieve our mission is equally important and also defines our culture — we act with integrity in the pursuit of excellence, we embrace our vibrant community and promote well-being, and we engage in open communication and are accountable for living our values.***

When we ***keep our promises and are open and honest***, we earn and sustain trust from each other, our students, our alumni and our partners.

At Our Best — A Shared Commitment — Integrity and Accountability (our “Code”) is intended to help us ***honor*** and ***shape*** our culture, put our Unifying Values into practice and build a stronger USC.

Our Code — Setting Expectations and Guiding Our Decisions and Actions

Our Code sets expectations and serves as a guide to both everyday situations and significant strategic choices. It also summarizes key policies and regulations that all Trojans must follow.

The Code does not address every possible situation, nor does it summarize every policy and regulation we must follow. Throughout the Code, links are provided to relevant USC resources that offer more detailed information. If you do not find the information you are looking for, talk to your supervisor, department chair or dean, or contact the Office of Ethics and Compliance at compliance@usc.edu.



WHO MUST FOLLOW OUR CODE?

As Trojans, we all must follow our Code as well as related policies and procedures. We also expect anyone acting on our behalf to conduct themselves in a manner consistent with our Code.

Our Responsibilities — Meeting Our Shared Obligations

No matter what our roles or responsibilities may be, we all have a commitment to support and advance our mission. This includes:

- *Being proactive and aligning our actions to our mission, vision, Unifying Values, this Code and our policies.*
- *Respecting others.*
- *Empowering each other, speaking up and taking action for what is ethical, and seeking advice when we have questions.*
- *Upholding the highest standards of ethical behavior and not allowing short-term objectives to supersede our values or jeopardize our long-term success.*
- *Taking responsibility for our actions and decisions.*
- *Showing empathy, welcoming differences in opinions, actively listening and addressing concerns.*



TO LEARN MORE

If you have any questions or concerns about our responsibilities, contact the Office of Ethics and Compliance at compliance@usc.edu.





Our Voice — Asking Questions and Sharing Concerns

Our value of Accountability means that we set clear expectations and take responsibility for our actions, decisions, outcomes and consequences. Trojans do not look the other way when violations of our Code, values, policies or the law are taking place. We address concerns and speak up for what is ethical, even when it is difficult to do so. We speak up when we see conduct that does not align with our Unifying Values in order to promote a culture where we can all thrive.

To help meet these responsibilities, USC has created resources to enable faculty and staff to ask questions, voice concerns and raise potential policy violations.

If you see or are concerned about conduct that may not align with our values, our Code, our policies or the law, raise your concerns directly with a fellow USC Trojan, if you feel comfortable doing so, and if it is appropriate. You can also contact, and in certain circumstances may be obligated to contact, any of the following:

- Your supervisor, department chair or dean
- Any other member of the USC leadership team or a Human Resources partner
- The Office of Ethics and Compliance
- The Office of Professionalism and Ethics
- The Office of Civil Rights Compliance

- USC Report & Response
- The Office of Healthcare Compliance
- The Keck Medicine Safety and Risk Management (SRM) reporting systems



HOW TO REPORT A CONCERN

USC Report & Response

Your front door to reporting concerns and getting the support you need.

Report online at report.usc.edu

Report by phone

213-740-2500

800-348-7454 (toll-free)

This number is staffed by live operators 24 hours a day, 7 days a week.

When you report through Report & Response, you may choose to remain anonymous where allowed by local law. All reports will be treated equally whether they are submitted anonymously or not. Reports made anonymously may limit the university's ability to fully investigate the concern.

You also have the option of calling the California Attorney General's Hotline, **(800) 952-5225**.

RETALIATION IS NOT TOLERATED

Retaliation is an adverse action taken against someone because they participated in a protected activity. There are many different forms of retaliation including unwarranted discipline or termination, threats or abuse, unfavorable changes to working conditions, being excluded from workplace events and being shunned by co-workers. USC will not tolerate retaliation against anyone who, in good faith, makes a report, cooperates with an investigation or otherwise engages in protected activity.



REPORTING IN "GOOD FAITH"

Making a report in "good faith" means that you report truthfully and honestly about the facts and information that led to your concern, regardless of whether the investigation of your report uncovers any actual misconduct. Anyone making a knowingly untruthful report may be subject to possible disciplinary consequences.



OUR UNIFYING VALUES



Our Voice — Asking Questions and Sharing Concerns



LIVING OUR VALUES

I often interact with faculty and staff on issues that touch on many of USC's policies. In some cases, individuals have differing opinions on how we should conduct ourselves or expect others to behave. What should I do to address such input?

Trojans come from a variety of backgrounds and have multiple viewpoints and perspectives. Our values unify us all, however, and can be used as a lens through which to assess challenging questions or decisions. While specific concerns must be addressed, often there are situations where it is best to have a discussion with your colleagues and then engage the right departments to help resolve your concerns. Seeking to understand each other's perspectives is often the first and most valuable step in charting the path forward.

A while ago, I reported gender bias in my unit. Now my manager has changed my shift, and I think the change may be retaliation for making the report. Is it retaliation? Should I have made the report? What should I do?

Raising concerns of gender bias in the workplace is a protected activity under the university's Policy on Prohibited Discrimination, Harassment and Retaliation, and employees are encouraged to report workplace discrimination, such as gender bias. You have several options. If you feel comfortable doing so, you might ask your manager for an explanation about the shift change. There may be reasons why the change was necessary that have nothing to do with your report. However, if you are uncomfortable discussing the matter with your manager or HR partner, you are not satisfied with the explanation, or you still believe retaliation occurred, contact the Office of Professionalism and Ethics at ope@usc.edu to discuss your concerns and to learn about the availability of supportive measures and resolution options. Retaliation for reporting or participating in an investigation related to sexual misconduct or discrimination or harassment based on a protected class (e.g., race, sex) is prohibited and should be reported to OPE.



TO LEARN MORE

If you have any questions about raising issues, sharing concerns or retaliation, contact the Office of Professionalism and Ethics at ope@usc.edu.

[Policy on Prohibited Discrimination, Harassment and Retaliation](#)

[Investigation of Non-Protected Class Conduct in Violation of University Policy](#)

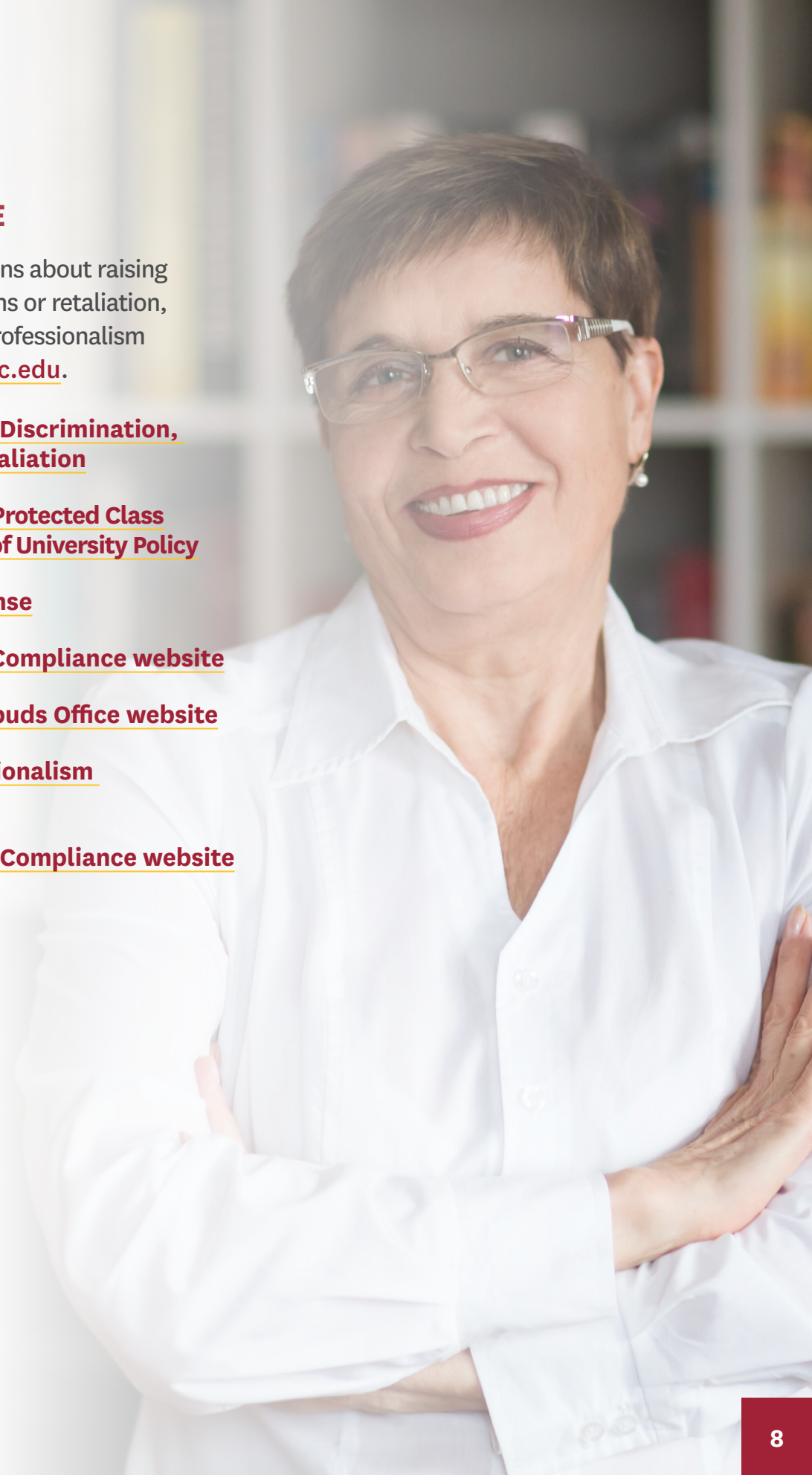
[USC Report & Response](#)

[Office of Ethics and Compliance website](#)

[The University's Ombuds Office website](#)

[The Office of Professionalism and Ethics website](#)

[Office of Civil Rights Compliance website](#)





Research and Scholarly Integrity

To protect our reputation and promote our mission, every Trojan must do their part and act with integrity in our research activities. This includes:

- Working to support an environment that respects rigorous standards for learning, creating, teaching and research.
- Making sure that all documentation and published findings are accurate, complete and unbiased.
- Following all relevant protocols, especially if your research activities involve human or animal subjects.
- Disclosing any potential conflicts of interest that could influence or appear to influence your objectivity or the validity of research results, including all support from industry.
- Never tolerating acts of plagiarism, falsification or fabrication of data, or other forms of research and scholarly misconduct.
- Complying with all requirements, terms and conditions of grant awards and contracts.
- Understanding and following all copyright laws and the Fair Use Doctrine.

- *Whenever research results have the potential for commercialization, taking appropriate steps and protecting the inventors' and the university's intellectual property and ownership interests themselves in a manner consistent with our Code.*



LIVING OUR VALUES

I realized I made a mistake in recording data for a research project. The data has not yet been finalized but correcting the mistake at this juncture could significantly delay the project. What should I do now?

Making a mistake is not misconduct but making a mistake and not taking steps to correct it would be. Our reputation for maintaining the highest standards of research and scholarly integrity depends on each one of us doing the right thing, even if it delays a project. If you become aware of a mistake, correct the data and notify the study's principal investigator. You should also take a moment to consider why the mistake was made in the first place. What can you, your research team and USC learn from the incident?



TO LEARN MORE

If you have any questions about research integrity, you may contact the Office of Research Integrity, Department of Grants and Contracts, or the Office of Research and Innovation.

[Research and Scholarship Misconduct Policy](#)

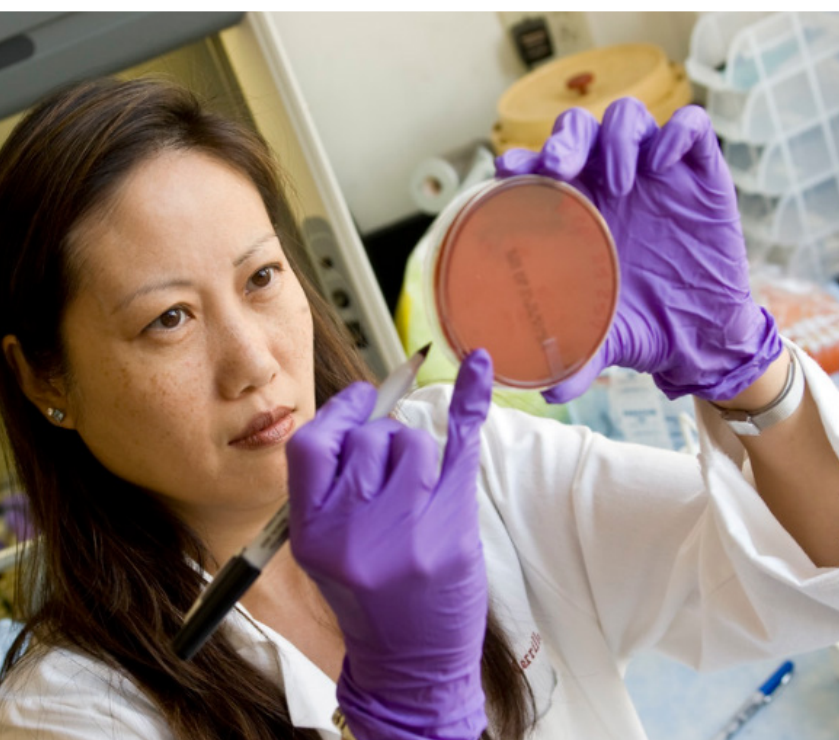
[Institutional Conflict of Interest in Research](#)

[The Office of Research Integrity](#)

[The Office of Research and Innovation](#)

[USC Department of Contracts and Grants](#)

[Faculty Handbook](#)



Excellence

WE BRING OUR BEST SELVES

We strive to better ourselves as a learning community through professional development, teaching, ongoing open dialogue, innovation, and research – promoting student success, outstanding medical care, and discovery.

In This Section:

Striving to Better Ourselves, USC and Society

Being Deliberate and Thoughtful in Our Choices and Actions

Avoiding Conflicts of Interest



Striving to Better Ourselves, USC and Society

As a premier academic institution, we strive for excellence in serving our students, our patients and our communities.

As Trojans, we are active leaders in what is taught, thought, created and practiced locally and globally. We confront the status quo and learn from our successes and our challenges.



AT OUR BEST — A SHARED COMMITMENT

- *Achieve excellence through collaboration and continuous improvement and by acting with integrity.*
- *Embrace innovation in the pursuit of our vision and mission.*
- *Seek continuous feedback and learn from our mistakes.*
- *Promote productive paths to contribute and share knowledge, resources and relationships.*



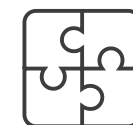


Being Deliberate and Thoughtful in Our Choices and Actions

Our mission includes the pursuit of excellence in academics, teaching, research, artistic creation, athletics, professional practice, medical care and public service.

Excellence is best achieved when our choices and actions are deliberate and thoughtful, aligned with our values and made in collaboration with our colleagues.

Making the right decision is not always easy. There may be times when we feel pressured or unsure of what to do. It's important to remember that there are resources available to help and that we are all part of the broader USC community.



AT OUR BEST — A SHARED COMMITMENT

- *Be willing to address difficult problems.*
- *Be open and clear about your assumptions and your decision-making process.*
- *When making a decision, involve others who will be affected by the outcome whenever possible.*
- *Seek input from a broad range of perspectives.*

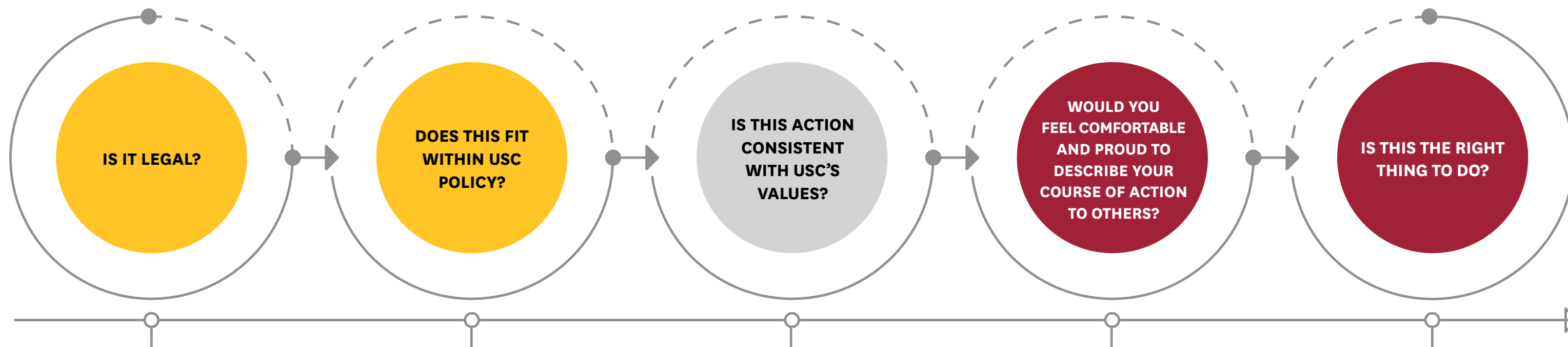


TO LEARN MORE

If you have any questions about raising issues, sharing concerns or retaliation, contact the Office of Professionalism and Ethics at ope@usc.edu.

[The Office of Professionalism and Ethics website](#)

It is impossible to address every ethical dilemma. When unsure, ask yourself:



IF YOU ANSWERED “YES” TO ALL OF THESE QUESTIONS, IT IS PROBABLY OK TO PROCEED. BUT IF YOU ANSWERED “NO” OR “I’M NOT SURE” TO ANY QUESTION, STOP AND SEEK GUIDANCE BEFORE PROCEEDING.



Avoiding Conflicts of Interest

A conflict of interest may occur whenever a competing interest interferes with our ability to make an objective decision on behalf of USC. Every Trojan is expected to use good judgment and avoid situations that can lead to even the appearance of a conflict, which can undermine the trust others place in us and damage our reputation.



AT OUR BEST — A SHARED COMMITMENT

- Avoid conflict of interest situations whenever possible. If a situation cannot be avoided, disclose it and discuss it with your manager.
- Be alert to situations, including the following, which are common examples of potential conflicts of interest:
 - **Outside employment and consulting** — You have an outside job or a consulting engagement, or you serve as a director, have a management role or have an ownership interest at another organization.
 - **Business opportunities** — You learn about a business opportunity because of your position at USC and take it for yourself without seeking appropriate approval.
 - **Family members** — You have a family member who reports to you or who works for one of our suppliers that you manage.

- **Advancement and alumni relations** — You work in a department that makes decisions related to the review, evaluation, award or distribution of scholarships or other institutional awards, and you have a relationship with alumni or their family that may be affected by such a decision.
- Disclose all conflicts. Conflicts may be actual, potential or even just a matter of perception. Since these situations are not always clear-cut, if you are engaged in or are considering activities that may create a conflict or the appearance of a conflict, disclose the situation to your manager and use the USC system for conflict disclosure, [diSClose](#). Once disclosed, the conflict can be properly evaluated, eliminated or managed.



LIVING OUR VALUES

I work in the Business Office. I recently received a package from a supplier that contained an expensive gift. We have already signed a contract with the supplier, so my colleague thinks it's fine to accept the gift, but I'm not sure.

You are right to be concerned. Although your decision to hire the supplier may not be affected by the gift, the gift may be perceived as excessive and create the appearance of a conflict of interest. Without full disclosure and approval, you should politely refuse the supplier's gift. Business courtesies of a nominal value that do not create an actual or perceived conflict of interest are generally acceptable.



GIFTS AND ENTERTAINMENT

It is never acceptable to offer personal gifts to, or receive personal gifts from, suppliers, potential suppliers, donors or prospective donors if those gifts could be perceived as influencing university business, are in excess of a typical business gratuity or could otherwise be perceived as improper.

No gifts or other benefits, including entertainment, can be offered to any government officials, without prior approval from University Relations. If you receive a request from a government official for a payment, other than legitimate taxes or fees, immediately report the matter to University Relations.

And remember, giving or receiving bribes is always illegal and a serious violation of our policies. A bribe may consist of the offer or promise to pay anything of value for the purpose of influencing any act or decision or securing an improper advantage.



TO LEARN MORE

If you have any questions or concerns about conflicts of interest or gifts and entertainment, contact the Office of Ethics and Compliance at compliance@usc.edu.

[Conflict of Interest and Commitment Policy](#)

[Institutional Conflict of Interest in Research](#)

[Relationships with Industry Policy](#)

[USC's conflict disclosure system, diSClose](#)

[Gifts and Hospitality Policy](#)

[Office of Ethics and Compliance website](#)

[Office of Healthcare Compliance website](#)



Community

WE ALL BELONG

We are a vibrant academic learning community. We thrive because we seek excellence; know that differences are strengths and that mutual respect and equal opportunity are central to successful learning, research, and innovation; and because discrimination is not tolerated.

In This Section:

Building a Welcoming Community

Promoting Community



Building a Welcoming Community

Each of us has a responsibility to help build and sustain a welcoming community where everyone is valued and all can thrive.

Our commitment to the development of human beings and society requires fostering a community in which we solicit, embrace and share multiple viewpoints. Building a generation of visionaries, innovators and creators requires expanding access and opportunity. We build a welcoming community by honoring and including all voices and ensuring fair policies, procedures and practices.



AT OUR BEST — A SHARED COMMITMENT

- Take responsibility — be proactive. Recognize that being part of a vibrant community is a shared responsibility and take action to help create an environment where multiple viewpoints can be heard.
- Value different experiences, cultures, perspectives and identities.
- Share openly and honestly — be open to the views of others, speak up and lead by example.
- Be thoughtful and deliberate to ensure that explicit and implicit biases are not influencing your decisions.
- Seek robust and respectful engagement to benefit from multiple perspectives.



LIVING OUR VALUES

During meetings, my supervisor refers to current social and political issues, asks me how I'm doing and makes a point of noting that the team is sensitive to how I must feel. I understand this may be an attempt to show empathy and support, but it makes me uncomfortable. What should I do?

Singling you out may create assumptions about your lived experience and political viewpoint. You can seek assistance from your HR partner or contact the Office of Civil Rights Compliance to discuss your concerns and receive supportive resources, as perceived political belief or affiliation is a protected characteristic under university policy. If you feel comfortable doing so, let your supervisor know that while you appreciate the concern, you will speak up if you need support or assistance.

During meetings, a co-worker makes jokes and derogatory comments about certain nationalities. The jokes make me uncomfortable, but no one else has spoken up. What should I do?

Jokes and comments that relate to a protected characteristic, like national origin, run counter to our unifying values and may violate policies that relate to discrimination, harassment and retaliation. By doing nothing, we are condoning and tolerating behaviors that can erode the welcoming community that we are all striving to maintain.

If you are a Designated Employee, you must report what you observed to the Office of Civil Rights Compliance at ocrc@usc.edu. You may notify your manager or an HR partner of your concerns. If comfortable, you can raise your concerns with your co-worker to share your perspective on their comments and how they made you feel.



TO LEARN MORE

If you have any questions or concerns about discrimination, harassment and retaliation based on a protected characteristic, we encourage you to contact the Office of Civil Rights Compliance at ocrc@usc.edu.

[Office of Civil Rights Compliance website](#)





Promoting Community

USC is committed to respecting the identities, voices, ideas, experiences and abilities of the USC community at the individual, team and institutional level. We comply with all laws that prohibit discrimination. We also encourage faculty, staff and job applicants to identify any need for reasonable accommodations.



AT OUR BEST — A SHARED COMMITMENT

- Remember that respect for USC community members begins with our daily interactions with one another.
- We bring our best selves — set an example. Support our commitment to belonging for all.
- Raise concerns through the appropriate channels about individual or institutional decisions made at USC that do not appear to align with our policies.



LIVING OUR VALUES

In my unit, the head of the unit and a colleague are close friends, and they frequently verbally harass or demean other colleagues at staff meetings. What should I do?

Behavior like that from anyone runs counter to our unifying values and is harmful to our culture. This is particularly true when such situations involve individuals in positions of power. If you feel comfortable doing so, you may choose to speak up against such behavior and support your colleague by checking in with those who are affected to see what their preferences are and/or contact a person of authority, such as your supervisor or HR partner. If you are a Designated Employee under USC's Policy on Prohibited Discrimination, Harassment and Retaliation, you must also immediately report what you have observed to the Office of Civil Rights Compliance if it appears to involve a protected characteristic.

I suspect that an individual at USC is engaging in discrimination based on race, and I am wondering whether it would be better for me to do some investigation on my own or to report my concerns. What would be the best course of action?

All members of the university community should be free to pursue their work, education and engagement in university programs and activities in an environment free from discrimination based on a protected characteristic (e.g., race). Instead of conducting your own investigation, you should report your concerns to Office of Civil Rights Compliance, which is the USC office with the expertise and responsibility to take prompt, equitable and appropriate action in response to your report.



TO LEARN MORE

If you have any questions or concerns about discrimination, harassment or retaliation related to a protected characteristic, we encourage you to contact the Office of Civil Rights Compliance at ocrc@usc.edu.

[Policy on Prohibited Discrimination, Harassment and Retaliation](#)

[Disability Accommodations Policy](#)

[ADA compliance resources](#)

[Institutional Accessibility website](#)

[Notice of Non-Discrimination](#)





Well-being

WE HONOR THE WHOLE PERSON

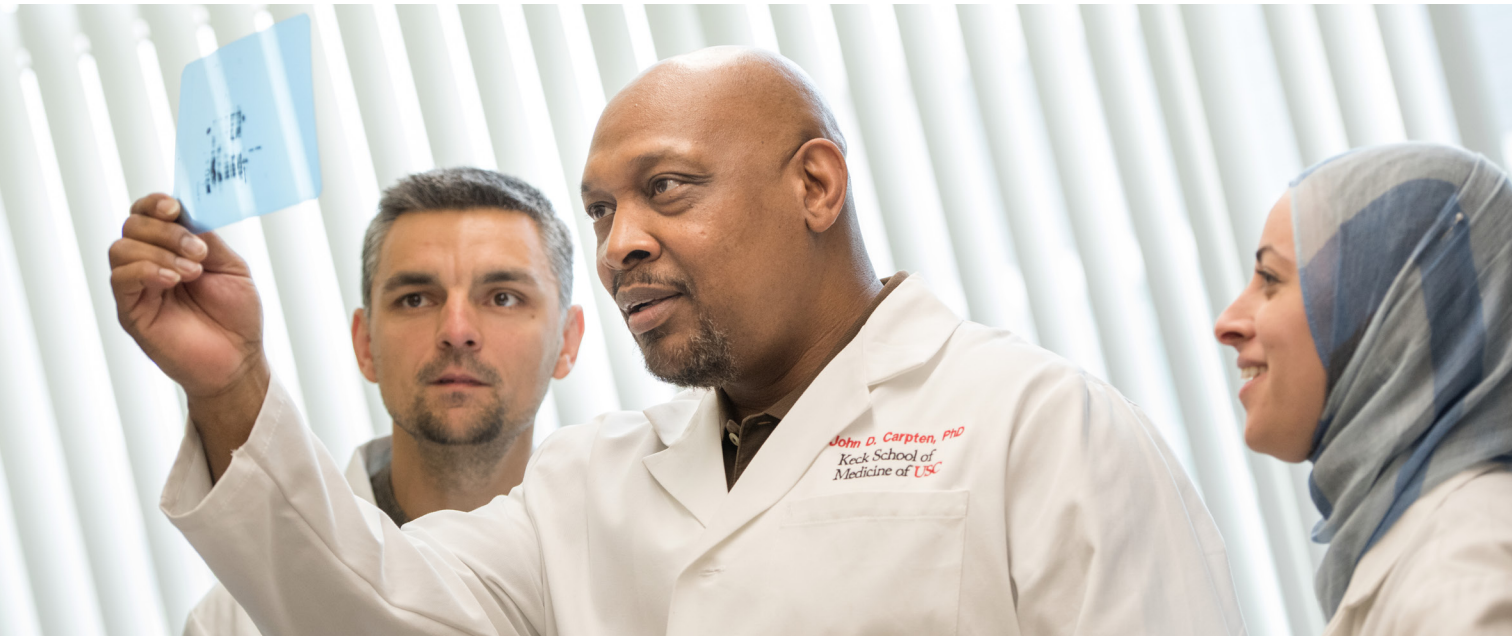
We create a caring culture that fosters our ability to thrive in mind, body and spirit in the successful pursuit of USC's mission.

In This Section:

Caring for One Another

Working for a Sustainable Future

Participating in Political Activities





Caring for One Another

Trojans are committed to caring for each other, encouraging compassion and empathy and creating an environment where everyone can thrive. This includes ensuring that USC is a community free from intimidation, harassment, exclusion, discrimination, retaliation, threat and crime.



AT OUR BEST — A SHARED COMMITMENT

- Seek advice, support and refer when concerned about a fellow Trojan.
- Know the campus resources.
- Treat all with fairness, civility and respect.
- Listen to others with curiosity and an open mind.
- If you are in a leadership or supervisory position:
 - Create a caring culture that fosters our ability to thrive in mind, body and spirit.
 - Strive for manageable and equitable workloads and realistic expectations and deadlines.
 - Create policies and practices that consistently take individual and community well-being into account.

- Understand that individuals have commitments outside of work.
- Respect people's time off.
- Appreciate and state how your employees are specifically valued and why what they do matters.



TO LEARN MORE

If you have any questions or concerns about sexual misconduct or discrimination or harassment based on a protected class (e.g., race, sex), contact the Office of Civil Rights Compliance at ocrc@usc.edu.

If you have any questions or concerns about health or safety issues, contact [Environmental Health and Safety](#) or by calling (323) 442-2200.

[Policy on Prohibited Discrimination, Harassment and Retaliation](#)

[Office of Civil Rights Compliance website](#)

[USC Environmental Health and Safety website](#)

[WorkWell Center](#)



HARASSMENT

Conduct by anyone that harasses another, or creates an intimidating, offensive, abusive or hostile work environment, will not be tolerated. We all must follow [USC's Policy on Prohibited Discrimination, Harassment and Retaliation](#).



LIVING OUR VALUES

While at a conference, a colleague repeatedly asked me out for drinks and made comments about my appearance that made me uncomfortable. I asked my colleague to stop, but the comments continued. We were not on campus and it was on personal time, so I was not sure what I should do. Is this harassment?

University policy prohibits harassment based on sex and gender in university programs and activities. Under certain circumstances, off-campus conduct has the potential to affect an individual's ability to access programs and activities. This type of conduct should be reported directly to the Office of Civil Rights Compliance at ocrc@usc.edu or

through the [USC Report & Response website](#) portal. The USC Report & Response website also provides resources and FAQs about reporting concerns.

I just learned that a good friend of mine who works at USC has been accused of sexual harassment and that an investigation is being launched. I cannot believe it is true, and I think it's only fair that I give my friend an advance warning or a "heads up."

USC is committed to undertaking thorough, complete and unbiased investigations. Providing a "heads up" to your friend could affect the integrity of the investigation. Accordingly, the university expects that you refrain from such communications. Your friend will be given the opportunity to respond to these allegations, and every effort will be made to conduct a fair and impartial investigation. An allegation of sexual harassment is a very serious matter with implications not only for the individuals involved but also for the university. Alerting your friend could jeopardize the investigation for your friend and for the individual raising the concern and expose USC to additional risk and liability.



Working for a Sustainable Future

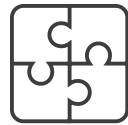
At USC, we believe that environmental, economic and social sustainability must be an integral part of our teaching, research, operations and engagement with each other and our broader community. The goals we have established and the initiatives we are undertaking are imperative for creating a sustainable future. As Trojans, we need to do our part to promote these efforts and weave them into how we perform our individual job responsibilities.



SUSTAINABILITY

Sustainability is a way of living and working in response to global challenges, including climate change, degradation of natural resources and loss of biodiversity.

We are committed to teaching and research that furthers our understanding of these challenges and solutions, as well as addressing them through modeling best practices, both on campus and through engagement with others, all in support of our unifying values.



AT OUR BEST — A SHARED COMMITMENT

- *Learn and incorporate sustainability concepts and practices into your teaching, research, department operations and individual behavior.*
- *Proactively look for ways to use energy and natural resources more efficiently and reduce waste, including following USC sustainability policies and procedures.*



TO LEARN MORE

If you have any questions or concerns about sustainability, contact the University Sustainability Office at sustainability@usc.edu.

[USC Sustainability website](#)



Working together
for a sustainable future





Participating in Political Activities

We believe in the rights of our faculty, staff and students to participate in the political process. We also follow the law and are careful whenever the university is involved in lobbying or other political activities. There may be times at work when we discuss topics about which we are passionate, such as politics. We may hear fellow Trojans sharing positions that differ from our own. In such circumstances, we seek to hear each other's perspectives. The rights of free speech and academic freedom go hand in hand with the responsibility to provide a welcoming and safe environment for all our faculty, staff and students.



AT OUR BEST — A SHARED COMMITMENT

- Remember that university services, funds, assets and facilities cannot be used for political purposes unless approved by University Relations.
- When publicly discussing politics, make it clear that your views and actions are your own and not those of USC, unless you are authorized to speak on USC's behalf by University Relations.



LIVING OUR VALUES

An elected official asked to use a USC facility for a campaign event. Is this allowed?

It is important that you inform University Relations and the Office of Ethics and Compliance's Political Compliance team before extending an invitation or approving such a request. There are many complex reporting requirements that need to be followed and much that needs to be coordinated. University Relations and Political Compliance will be able to advise you (and anyone else at USC who may be involved) on the proper procedures. Political Compliance will also keep track of communications, determine whether the use of facilities or the provision of services constitute gifts to public officials, assess whether the activity is considered lobbying and advise on any specific reporting requirements that apply.



TO LEARN MORE

If you have any questions or concerns about political activities, contact Political Compliance at politicalcompliance@usc.edu.

[Political Activity Policy](#)

[Government Relations website](#)





Open Communication

WE ENGAGE IN OPEN AND RESPECTFUL DIALOGUE

We actively listen, communicate and provide opportunities for respectful dialogue and interaction across all viewpoints.



In This Section:

Creating an Environment for Open and Honest Dialogue

Freedom of Expression at USC

Representing USC



Creating an Environment for Open and Honest Dialogue

As Trojans, we believe the best way to promote intellectual curiosity and sustain academic freedom is to create and maintain an environment that supports open and respectful dialogue.

Open and respectful dialogue fosters trust and engagement with our community, including our faculty, staff, students, patients and those who partner with us. When trust is present, every Trojan can learn, lead, innovate and create.



AT OUR BEST — A SHARED COMMITMENT

- Communicate with respect and cultural sensitivity.
- Actively listen and solicit dialogue.
- Show respect for the opinions of others.
- Remember it is OK to agree to disagree.
- Seek to understand different perspectives.
- Work together to ensure an environment that supports free and open inquiry, civility, patience, acceptance, mutual respect and understanding.
- Never engage in violence or intimidation as a means for closing discussion and debate.



LIVING OUR VALUES

I am part of an interdisciplinary committee, and I am frustrated by the lack of candor and cooperation. Too often members of the committee withhold what I consider to be important information. I believe, in some cases, that they want to avoid sharing bad news, or they fear that the information might lead to difficult or awkward discussions, but I feel we need to have those discussions if we are to make solid decisions. What should I do?

You are correct that it is important that we have frank and candid conversations, even if they are difficult. You should discuss the matter with the committee. In some instances, there may be privacy or confidentiality issues that limit what information can be shared, but overall, we need to encourage open and honest discussions whenever possible.



TO LEARN MORE

If you have any questions or concerns about promoting open and honest dialogue, contact the Office of Ethics and Compliance at compliance@usc.edu.

Freedom of Expression

At USC we acknowledge and support differing perspectives, and we encourage robust discussions and civil discourse. Our commitment to the expression of differing opinions and concerns is an essential element of the academic process.

All members of the university community can play an important role in maintaining an atmosphere that values free inquiry and expression, treats others with respect and empathy, and provides an enriching educational experience for all.

USC is committed to protecting free speech and academic freedom, in compliance with state and federal law and university policy. The university's policies on students' right to free speech are set forth in the USC Student Handbook, and the university's policies on academic freedom more generally are set forth in the Faculty Handbook.



TO LEARN MORE

Visit USC's [Freedom of Expression website](#) for more information on the university's values on free speech, expectations and policies.



Representing USC

Our faculty and staff are leaders in their fields of expertise and are encouraged to contribute to the advancement of the arts, sciences and public policy. This often includes conducting research, creating new works, publishing, presenting and serving the community. In all these ways, members of our community are representing USC. In these activities, they are free to explore and innovate, bounded only by our values and personal and professional standards.

However, there may be situations when faculty and staff are asked to speak to the public and officially represent the university. In these instances, only authorized spokespeople are permitted to take positions and speak on behalf of USC.



AT OUR BEST — A SHARED COMMITMENT

- Draft communications carefully and consider how your message will be interpreted by others.
- Unless you are authorized to do so, never give the impression that you are speaking on behalf of USC in any communication that may become public.
- Be mindful of privacy and confidentiality when using social media.
- Do not post images of USC patients on your personal social media accounts.



USING SOCIAL MEDIA

Social media is an excellent way to connect with other Trojans and beyond, but always be careful when writing anything that might be published online, especially if you are identified as a USC employee. When you use social media, keep the following in mind:

- Keep in mind the potential application of University policy, including the University's Policy on Prohibited Discrimination, Harassment, and Retaliation.
- When listing USC as your employer on any social media site, consider that your social media activity may have an impact on the public image and reputation of the university. Take care that you do not give the impression that you are speaking on behalf of USC.



LIVING OUR VALUES

I have a personal blog where I share my thoughts and feelings with my friends. What should I consider before including any work-related information?

Do not disclose or discuss any confidential information you may have obtained from the university, school or departmental records through a position of trust or confidence. This includes, but is not limited to, intellectual property, proprietary trade information, confidential student records, patient records, donor files, and personal data such as employee home addresses.



TO LEARN MORE

If you have any questions or concerns about representing USC or using social media, contact University Communications and the [Brand and Identity website](#).

[Faculty Handbook](#)

[Keck Medicine of USC Social Media Policy](#)

Keck Medical
Center of USC



Accountability

WE TAKE RESPONSIBILITY

At all levels of the university, we set clear expectations and take responsibility for our actions, decisions, outcomes and consequences.

In This Section:

Being Accountable

Using University Resources

Ensuring the Integrity and Accuracy of Our Records

Protecting Personal and Confidential Information

Meeting Our Healthcare Obligations

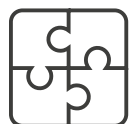




Being Accountable

We are committed to holding ourselves and each other accountable to all university policies and applicable laws, and to living our Unifying Values.

By holding ourselves and others accountable, we help ensure that our values will be more than just words. By adhering to our mission and acting in accordance with our values, we build trust and lead by example. As Trojans, we undertake all our actions with the understanding that we are accountable to ourselves, to each other and to our communities.



AT OUR BEST — A SHARED COMMITMENT

- Follow through on the promises you make, learn from your mistakes and accept the consequences of your actions and decisions.
- Take a proactive stance toward accountability. Accountability is not just about looking back on our actions; it is a value we work toward.
- Do not cut corners, cover up mistakes or avoid addressing problems.
- When you observe something that may make a member of our community feel devalued, say something and take action.

- If you are in a leadership position:
 - Do not apply different standards based on power or status.
 - Do not blame others for your own mistakes.
 - Do not retaliate or allow others to retaliate.
- We are accountable for knowing requirements that apply to our positions and for completing training.



LIVING OUR VALUES

I am a supervisor. If I observe misconduct in an area not under my supervision, am I still required to report the issue? I would rather not get involved.

Accountability is everyone's responsibility, and as a supervisor you are always expected to address misconduct. In this case, the best approach would be to talk first with the supervisor who oversees the area where the issue is occurring, but if this doesn't work, or isn't feasible, contact Human Resources. And remember: If there is misconduct anywhere at USC, it affects all of us.



TO LEARN MORE

If you have any questions or concerns about accountability, contact the Office of Ethics and Compliance at compliance@usc.edu or Human Resources at uschr@usc.edu.

[Investigation of Non-Protected Class Conduct in Violation of University Policy](#)

[Cooperation with Compliance Investigations Policy](#)

[Office of Ethics and Compliance website](#)

[USC Report & Response](#)

[Trojans Care 4 Trojans \(TC4T\) — Campus Support and Intervention](#)

[Policy on Prohibited Discrimination, Harassment and Retaliation](#)

[Office of Healthcare Compliance website](#)

[Keck Medicine SRM](#)

[Campus Wellbeing and Crisis Intervention](#)





Using University Resources

Each of us is entrusted with the care of USC resources. We all must do our part to protect these resources from loss, damage, theft, waste and improper use.



USC'S RESOURCES INCLUDE:



Physical assets — Office equipment, furnishings, university vehicles, inventory and supplies



Information assets — USC logos, brand, research findings, data and databases, and intellectual property



Financial assets — Funds including checks, petty cash, credit cards, invoices and other financial records



Electronic assets — Computers, peripherals, electronic storage devices, telephones, information systems, internet/intranet access, personal digital assistants and other similar devices, systems and technology



AT OUR BEST — A SHARED COMMITMENT

- *Treat USC property with the same care and respect with which you treat your own.*
- *Strive to obtain the best value when making purchases for USC.*
- *Do not use USC property or resources for personal use, except as permitted by USC's policies.*
- *Secure your office, workstation and equipment by locking items or completely shutting down systems.*



LIVING OUR VALUES

I'm working remotely with a group of colleagues, and they asked me for my password so they could log in to another system that we use collaboratively. It is really important that my colleagues have access. May I share my password with them?

No, you cannot share your password. Sharing passwords is a significant cause of cybersecurity risk at USC. Contact Information Technology Services at consult@usc.edu or 213-740-5555. They will assist you in finding a different way to share the information.



PROTECT OUR DATA AND INFORMATION SYSTEMS

Follow our information security and privacy policies that are designed to protect our information networks, digital assets, computers, programs and data from attack, damage or unauthorized access:

- Report any cybersecurity incident including lost or stolen devices immediately to security@usc.edu or call 213-740-5555.
- Take annual cybersecurity training for all staff and faculty.
- If you manage any information systems, websites or digital assets, be sure to understand your additional responsibilities in maintaining the security of the assets you manage.
- Limit personal use of USC-owned computers and phones. Occasional

personal use is permissible if it doesn't interfere with your job responsibilities or productivity.

- Protect your usernames and passwords.
- Utilize multifactor authentication for USC email accounts and remote access to systems and networks at USC. Report suspicious links in emails, even if you think you know the source.
- Do not use unlicensed software or use your USC-owned computers and phones for games, jokes or viewing offensive or illegal material.
- Ensure laptops and mobile devices that access USC information, data or systems have disk encryption enabled. This reduces the privacy risks if the device or laptop is stolen or lost.



TO LEARN MORE

If you have any questions or concerns about using university resources, contact Audit Services at ofa@usc.edu.

[Misappropriation of University Assets Policy](#)

[Acceptable Use Policy](#)

[Financial and Business Services website](#)

[Information Technology Services](#)

[Keck IS Password Security Policy](#)



Ensuring the Integrity and Accuracy of Our Records

Each of us has a responsibility to ensure that the information we record is full, fair, accurate, timely and understandable.

Employees involved in preparing financial statements have special responsibilities in this area, but all of us contribute to the process of accurately recording financial results and maintaining accurate records.



AT OUR BEST — A SHARED COMMITMENT

- Be truthful. Never falsify any transactions or record any misleading entries.
- Carefully follow all legal requirements and our internal controls and make sure all records are supported by proper documentation.
- Manage records responsibly. Know and follow our policies related to handling, storage and disposal of records. If you receive a legal hold notice, follow its instructions on maintaining the information it covers.



LIVING OUR VALUES

I met with a salesperson and was asked to sign a contract for the supplies I need to purchase. Since it is only a few thousand dollars, my department has the funds and I know it is a good deal, can I go ahead and sign the contract instead of sending it to Procurement?

No. Very few individuals have authority to sign agreements, regardless of dollar value. Unless you have expressly been authorized to sign agreements via a formal signature delegation letter, you cannot sign an agreement that binds the university with a third party.



I am a research administrator in a lab. We are in the final month of a National Institutes of Health project and have a large balance left in the account. One of the researchers asked me to buy a piece of equipment for the lab that we have not been able to afford in the past; it will really help accelerate our future research in new and exciting ways. As long as the equipment will help future research in the same field, is it OK for me to use the remaining funds for this purchase?

No. The funds provided are restricted and can only be spent in support of the specific research project, in accordance with the sponsored research contract. In this case, the project will end before it can benefit from the purchased equipment.

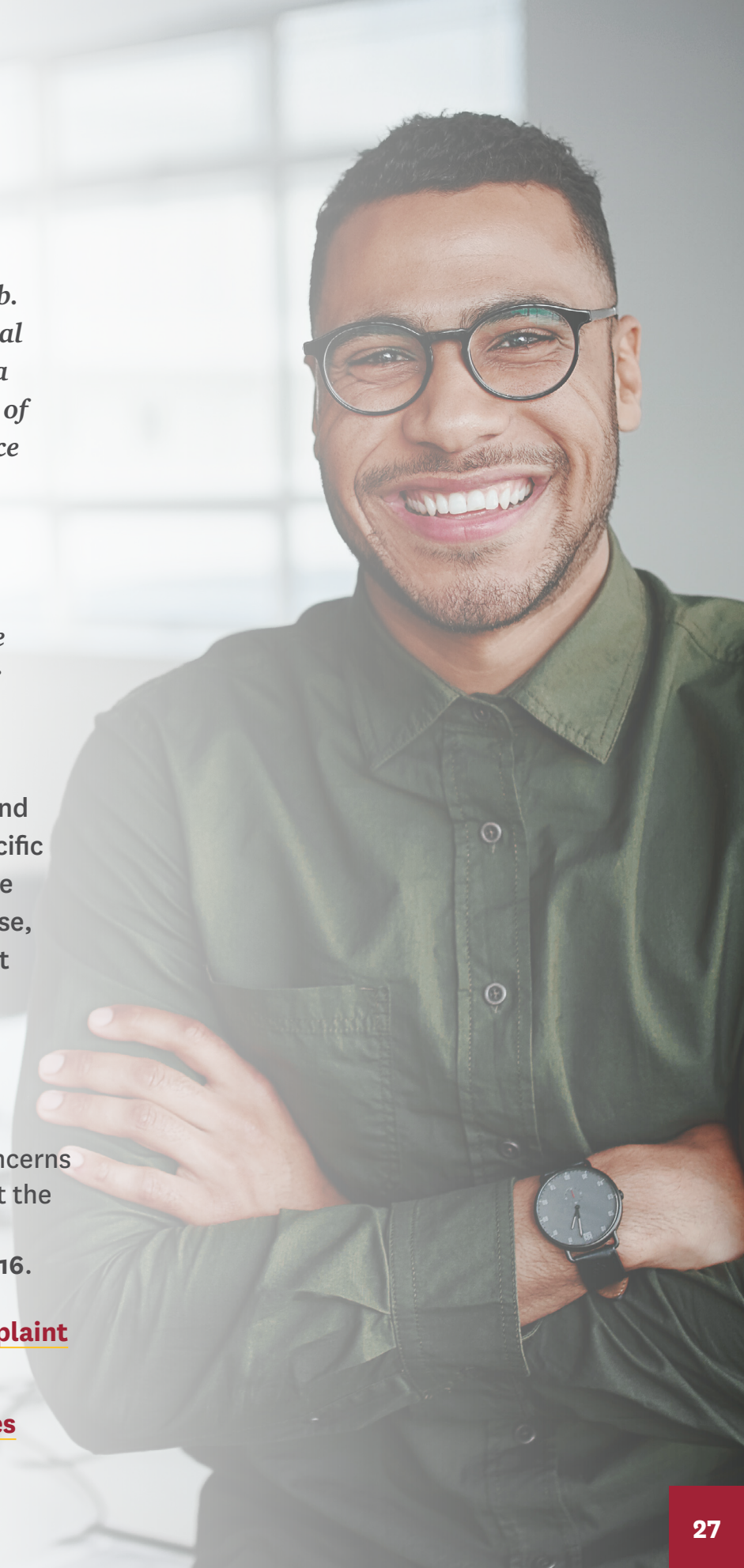


TO LEARN MORE

If you have any questions or concerns about financial records, contact the USC Business Services Office at (213) 740-2281 or (213) 740-2716.

[Accounting and Auditing Complaint Reporting Policy](#)

[Financial and Business Services website](#)





Protecting Personal and Confidential Information

Our colleagues, students, prospective students, patients and others trust us to handle their personal information with care. We must honor that trust by respecting their privacy and taking steps to protect their personal information.

In addition to personal information, we may also have access to confidential information related to USC's operations as well as information entrusted to us by third parties. We must keep all such information secure and protect it from loss, misuse and inappropriate access or disclosure.



AT OUR BEST – A SHARED COMMITMENT

- Respect the privacy of others. Keep personal and confidential information safe and secure.
- Use care when handling and storing personal and confidential information.
- Be mindful to only collect, access, use, share and disclose the minimum amount of personal information needed to accomplish the task.
- Only share USC personal and confidential information on a need-to-know basis and as permitted by USC policies and the law.

- Use university-owned technology and devices for appropriate purposes to help limit vulnerabilities leveraged by bad actors to access personal and confidential information.
- When separating from USC, return all sensitive university data and USC-owned devices unless an exception has been granted.



DATA PRIVACY

Data privacy laws, including the [Health Insurance Portability and Accountability Act \(HIPAA\)](#) and the [Family Educational Rights and Privacy Act \(FERPA\)](#), govern how we collect, store, use, share, transfer and dispose of the personal information of USC employees and students.

Under these and other similar laws, private or personal information means any information that can be used to identify a specific person, such as name, address, phone number, photo, birth date, driver's license number, banking or payroll information, government-issued identification information, medical condition, medical history, medical record number or other similar personal information. Certain personnel records must also be kept confidential.



LIVING OUR VALUES

I received a phone call from a colleague requesting the name, Social Security number; bank account information, home address and date of birth for a large number of university employees. The individual requesting the information said it was an emergency and that my supervisor approved the request. I know the information being requested is sensitive, but is it OK to provide it to the caller?

When asked to share sensitive information such as Social Security number and bank account information, exercise caution. Verify the identity and authority of the requestor, double check with your supervisor, and if the request is valid, only provide the minimum amount of information necessary to satisfy the purpose of the request. And, if appropriate, check with your local IT administrator on the most secure way to transmit the information.



TO LEARN MORE

If you have any questions or concerns about personal or confidential information, contact the Office of Ethics and Compliance at compliance@usc.edu.

[Acceptable Use Policy](#)

[Data Privacy Policy](#)

[HIPAA Policies](#)

[Keck IS Policies](#)

A good friend of mine called me at work and asked me to use my access to the Student Information System to check her son's grades. My friend confided in me that she has noticed her son demonstrating some erratic behavior and is concerned he is not performing well in his classes. Should I provide my friend the information?

No. Although you may want to help your friend, the Family Educational Rights and Privacy Act (FERPA) prohibits disclosing a student's grades to parents without the student's permission. Sharing the information violates the student's FERPA privacy rights, and if the student complained to the Department of Education (DoE), it could result in an investigation and consequences to USC including loss of DoE funding.

[Payment Card Industry Data Security Standards Policy](#)

[Protection of Consumer Financial Information Policy](#)

[Protection of Social Security Numbers and Other Restricted Information Policy](#)

[Record Management Policy](#)

[Student Records Policy](#)

[Employee Records Policy](#)



Meeting Our Healthcare Obligations

Whether through Keck Medicine of USC or the departments and schools of University Clinical Services, our highest priority is delivering exceptional, compassionate care to patients and their families. We believe that all patients are entitled to equal access to care and are treated with respect.

We commit to delivering high-quality care with kindness and consideration. We exhibit excellence in all we do, incorporating sound judgment in our decisions, practicing civility in our interactions and communications with our patients, families and co-workers. Respect is the cornerstone of the [Keck Commitment](#) and guides our pursuit of excellence in the workplace.



PATIENT PRIVACY

Our patients' privacy and the security of their health information is one of our top priorities. Protecting the confidentiality of our patients and safeguarding their health information is a matter of trust — and is required by law. We have a duty to safeguard and protect patient health information as we provide and coordinate care for our patients.



AT OUR BEST — A SHARED COMMITMENT

- Treat all patients and their families with respect and dignity.
- Provide quality care that is safe, appropriate and medically necessary.
- Be responsive to individual healthcare needs; make reasonable efforts to accommodate individual preferences.
- Help patients understand and exercise their rights, including the right to privacy, to be free from discrimination and to make informed healthcare decisions, and encourage them to speak openly with their healthcare team.
- Provide accurate and timely responses to patients' questions.
- Ensure that patients receive care in a safe setting free from all forms of abuse or harassment.
- Understand your obligations to follow all federal and state healthcare program requirements.
- Disclose any potential conflicts of interest that could influence or appear to influence clinical judgment in the provision of care.
- Make sure that meaningful, timely, complete and clinically pertinent medical records are documented for all patients.



LIVING OUR VALUES

I was recently in a situation that made me uncomfortable. A physician needed to ask a patient about her sexual history to obtain a full clinical picture. The patient was clearly reluctant to answer the questions, but I did not feel it was my place to speak up. What should I have done?

The physician should have explained why these questions were necessary. This would have helped make the questions feel less invasive and prevent the patient from wondering if the clinician was asking the questions for an inappropriate reason. Active communication between the physician and individuals assisting during the history and exam is beneficial for both the patient and physician, and you can play a critical role in it. Use of key words such as “update” when a patient needs explanation or “pause” when a patient is experiencing discomfort can be cues to use to prevent miscommunication during sensitive encounters. Ask your supervisor for additional training for both yourself and the physician on how you can communicate during a history and examination.



TO LEARN MORE

If you have any questions or concerns about meeting our healthcare obligations, contact the Office of Healthcare Compliance at compliance@med.usc.edu.



While walking back to my department, I overheard other staff members discussing details about a celebrity patient in house receiving care. Can I share this information with my department since we all coordinate care for patients in the hospital?

You may only disclose patient health information to other faculty and staff members who are coordinating care for the specific patient in question. The information you overheard is not one of your patients. Therefore, as you are not coordinating or assisting in care for the celebrity patient, you may not further disclose that information to anyone else. Also remember that it is not appropriate to access medical records for any patient you are not treating or assisting in the coordination of care.

[HIPAA Policies](#)

[Office of Healthcare Compliance website](#)

[Office of Integrated Risk Management website](#)

[Keck Medical Center of USC policies](#)

[USC Verdugo Hills Hospital policies](#)

[USC Care Medical Group policies](#)

[Keck Professionalism Program](#)



Helpful Resources

RESOURCE:



CONTACT:



Office of Ethics and Compliance

compliance@usc.edu (213) 740-8258
oec.usc.edu

Office of Civil Rights Compliance

ocrc@usc.edu (213) 740-5086
ocrc.usc.edu

Ombuds Office

University Park Campus
upcombuds@usc.edu (213) 821-8556

Health Sciences Campus
hscombuds@usc.edu (323) 442-0382

USC Report & Response

(213) 740-2500 or (800) 348-7454
or visit report.usc.edu

Academic Senate Office

acsenate@usc.edu (213) 740-7169

USC Human Resources

uschr@usc.edu (213) 821-8100

University Relations

localgov@usc.edu (213) 740-5371

Office of Professionalism and Ethics

ope.usc.edu (213) 740-5755

Office of Healthcare Compliance

compliance@med.usc.edu (323) 442-8588

Staff Assembly

staff.assembly@usc.edu





Living Our Values, A Message from Provost Guzman and Dr. Shapiro

Dear Colleagues,

There are so many things to be excited about at USC. As we continue to grow as an institution, it is imperative that our campus culture reinforces our unifying values and enables each of us to thrive. This is how USC will continue to be successful in pursuing its academic mission, expanding its research, and serving the communities surrounding our campuses and beyond.

At times in the course of our work we are called to deal with complex challenges. Some of the most important things we can do in these instances is reflect on how USC's values pertain to the situation, consult resources like this one, and seek guidance by asking questions. Please review this Integrity and Accountability Code and keep it bookmarked for easy reference. The policies and guidelines within these pages reinforce the values that we all embrace as well as support thoughtful, ethical decision-making and community participation.

If you would like clarification or more information on any part of the contents of this Code, please consult the resources page or reach out to our colleagues in the Office of Ethics and Compliance. The Ethics and Compliance team will be happy to assist you with topics ranging from data protection to research compliance, accessibility, raising concerns, and more.

Thank you for all you do to continually improve the Trojan experience.

Sincerely,

Andrew Guzman

Provost and Senior Vice President for Academic Affairs

Dear Colleagues,

Medicine—with its ability to save or transform lives, often when people are at their most vulnerable—is among the highest of callings. There are few professions in which integrity and accountability are more important than health care.

This Integrity and Accountability Code exists to support us in our endeavors. It was developed by the University with extensive input from Keck Medicine of USC and the Keck School of Medicine of USC. I urge you to consult this Code and familiarize yourself with its contents. It is important that we all understand the values that unify us as members of the USC community; along with the policies, resources and behaviors that align with those values.

No matter your job in our health system, you play a vital role in providing best-in-class, compassionate care to all populations. I want to thank you for the work you do, and for being committed to acting with the utmost integrity in our constant pursuit of excellence.

Sincerely,

Dr. Steven Shapiro

Senior Vice President, Health Affairs