

# SYSTEM POLICY

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## EC-02 - Code of Conduct and Certification

Owner: Ethics and Compliance Department

### Key Points

- This policy applies to The MetroHealth System (MHS) Workforce Members.<sup>1</sup>
- This policy establishes the process for distributing, certifying compliance with and updating the MHS Code of Conduct (Code).

### Policy

1. Accessing the Code. MHS provides internal and external digital versions of the Code. The internal-only interactive version is posted on the [Ethics and Compliance Portal](#). The public-facing version of the Code is available in English and in Spanish on the [MetroHealth Information Village \(MIV\)](#) as well as on the <https://www.metrohealth.org/>.
2. Following the Code and Reporting Violations. Workforce Members follow the Code including promptly reporting any violations of the Code (see [EC-04 – Reporting Compliance Concerns](#)).
3. Annual Review. Ethics and Compliance facilitates the review, consulting with Human Resources and other subject matter experts as necessary to review the Code periodically (at least annually) and makes amendments as necessary.
4. Training. Workforce Members receive training on the Code in accordance with [EC-03 - Ethics and Compliance Training](#).
  - 4.1. New Workforce Members requiring Code training receive training within 30 days of hire. During training, Workforce Members receive an overview of the Code, instructions on how to access it and certify completion of Code training.
  - 4.2. Current Workforce Members requiring Code training receive training and certify receipt of Code updates annually.
5. Certification. After training, Workforce Members complete a certification confirming that they:
  - 5.1. Received information on accessing the Code;
  - 5.2. Have read or will read the Code; and
  - 5.3. Agree to follow the Code.
6. Annual Review Process. During each employee’s annual performance evaluation, managers review the employee’s adherence to compliance program requirements, including Code training and living the Code in their day-to-day work.
7. Storage of Certification Forms. MHS maintains documentation of each Workforce Members’ Code certification.

## Cross References

[EC-03 – Ethics and Compliance Training](#)

[EC-04 – Reporting Compliance Concerns](#)

## End Notes

- <sup>1</sup> Workforce Member: Employees, providers, volunteers, trainees, and other persons whose conduct, in the performance of work for MHS, is under the direct control of such entity, whether or not they are paid by MHS.

## Dates

Initiated: July 2018

Reviewed/Revised: June 2020, July 2021, July 2022

## Approved

Cheryl Wahl – Chief Ethics and Compliance Officer

MHS Policy Committee