

SYSTEM POLICY

EC-04 – Reporting Concerns

Owner: Ethics and Compliance Department

Key Points

- This policy applies to all The MetroHealth System (MHS) Workforce Members.¹
- This policy outlines the expectations and procedures for Workforce Members to timely report potential violations of the legal or compliance aspects of the MHS Code of Conduct, and potential or actual violations of policies, procedures, laws or regulations applicable to MHS (Reported Concerns). Examples of Reported Concerns include potential fraud and abuse, privacy issues, violations of Ohio Ethics laws, billing concerns, and conflicts of interest.
- For patient safety or patient care concerns, Workforce Members file reports through the Safety Event Reporting System through the Origami system.

Policy

1. Duty to Report. Workforce Members promptly report concerns to assist MHS in identifying and resolving potential or suspected wrongdoing involving MHS or its Workforce Members. MHS also encourages patients, visitors, vendors, community members, and others to report concerns.
2. Reporting Concerns.
 - 2.1. Workforce Members are encouraged to report concerns to their supervisor or a member of their chain of command.
 - 2.1.1. Supervisors or members of management who receive a Reported Concern forward the report as needed to the appropriate department within MHS.
 - 2.1.2. When a Workforce Member is uncomfortable reporting directly, supervisors may report concerns on their behalf, though direct information from the Workforce Member may be necessary for appropriate investigation.
 - 2.2. If a Workforce Member is uncomfortable reporting directly to their supervisor or their chain of command, they should report the issue to the appropriate department (see Reporting Guide for additional reporting options):
 - 2.2.1. The Ethics and Compliance Department (EC);
 - 2.2.2. The Legal Department;
 - 2.2.3. The Human Resources Department (HR);
 - 2.2.4. Internal Audit;
 - 2.2.5. The Quality Institute;
 - 2.2.6. The Department of Public Safety;
 - 2.2.7. The MetroHealth Ethics Line (MEL); or
 - 2.2.8. The Safety Event Reporting System (Origami).
3. Open Door Policy. MHS maintains an “open-door policy” at all levels of management to encourage Workforce Members to report concerns directly through their chain of command.

4. The Chain of Command. MHS encourages Workforce Members to report concerns first with their supervisor or department leader.
 - 4.1. If this is uncomfortable or inappropriate, Workforce Members may report to any of the departments indicated in section 2.2.
 - 4.2. For issues that involve personnel matters such as payroll, workplace civility and disciplinary issues, MHS encourages employees to contact HR to resolve such issues.
5. Anonymous Reports. Individuals may report concerns anonymously to MEL. MEL is open for anyone, including patients, to report a Reported Concern; however, patients are encouraged to raise concerns with their care team or the Patient Relations team. Reported Concerns received via MEL are assigned to the appropriate administrative department to investigate (see section 2.2).
 - 5.1. Individuals can access MEL in the following ways:
 - 5.1.1. Phone: (216-778-1660),
 - 5.1.2. Webpage (www.metrohealth.org/compliance), and/or
 - 5.1.3. Text (216-600-1456).
 - 5.2. MEL does not track or record phone calls.
 - 5.3. MEL is staffed by a third-party vendor 24/7. Individuals calling MEL speak with a third-party hotline specialist who collects information about the individual's compliance concerns. The third-party hotline specialist explains the features of MEL (for example, anonymous reporting, feedback options) that enable the reporter to respond to questions from the investigator or receive updates about the investigation. For additional information see [MEL Reference Guide](#).
6. Confidentiality. MHS reviews and investigates all Reported Concerns in a manner that protects the confidentiality or anonymity of the individuals who report the concerns, to the extent allowed by the nature of the investigation.
7. No Retaliation. MHS prohibits retaliation against Workforce Members who report suspected wrongdoing in good faith. MHS investigates all reports of retaliation against Workforce Members. See [HR-80: Non-Retaliation](#).
8. False Reports. MHS investigates and addresses any Workforce Member who knowingly reports false or baseless concerns.

End Notes

- ¹ 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.
- ² EC Review means a factual and/or legal investigation into an EC Report.

Dates

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Approved

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MHS Policy Committee