

# SYSTEM POLICY

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## HR-29 - Equal Employment Opportunity and Nondiscrimination

Owner: ADMINISTRATIVE SERVICES

### Key Points

- This policy applies to job applicants and Workforce Members<sup>1</sup> of The MetroHealth System (MHS).
- This policy provides information regarding MHS's commitment to equal employment opportunity (EEO), non-discrimination, and non-retaliation, including how to report concerns.
- MHS takes concerns involving potential discrimination seriously. MHS investigates and takes appropriate remedial action to address violations.

### Policy

1. MHS is an equal opportunity employer, committed to maintaining non-discriminatory policies, procedures, practices, and treatment in all aspects of employment.
  - 1.1. MHS makes employment decisions based on business factors such as operational needs, job requirements, and individual qualifications, without regard to race, color, religion, gender, sexual orientation, gender identity or expression, citizenship, national origin, ancestry, disability, age, genetic information, pregnancy, veteran/military status, or other characteristic protected by law or MHS policy.
  - 1.2. MHS does not tolerate discrimination based on any of the characteristics in section 1.1. above. This includes in recruitment, hiring, promotions, transfers, discipline, terminations, wage and salary administration, benefits, and training. MHS supports diversity and inclusion in all its activities.
2. MHS applies principles of diversity, equity, inclusion, non-discrimination, and non-retaliation to its relationships with other Workforce Members, patients, and the community.
3. MHS provides reasonable accommodations for qualified applicants and employees with disabilities in accordance with the Americans with Disabilities Act and other applicable laws. Similarly, religious accommodations are provided in accordance with applicable laws. Requests for accommodation or questions about accommodation are made to an applicant's Human Resources contact, an employee's immediate supervisor, or through the Employee and Labor Relations area of Human Resources.
4. Reporting and Investigating Concerns of Potential Discrimination. Individuals who have concerns involving potential discrimination based on a protected characteristic(s) are encouraged to submit their concerns in writing as soon as possible to Employee and Labor Relations. Alternatively, individuals may also report concerns through The MetroHealth Ethics Line (MEL) at (216) 778-1660 or at [www.metrohealth.org/compliance](http://www.metrohealth.org/compliance). Anonymous complaints will be investigated to the extent feasible based on the information provided, and more information may be necessary for full investigation.
  - 4.1. The reporting individual's written submission should include details about all relevant dates, events, and facts, identify all individuals involved and any witnesses, and explain why the individual believes that discrimination may be involved.

- 4.2. Should concerns be raised to other members of management, management contacts Employee and Labor Relations. All supervisory employees are responsible for monitoring compliance with this policy, reporting concerns to Employee and Labor Relations, and taking immediate appropriate action when necessary.
  - 4.3. MHS takes concerns involving potential discrimination seriously. MHS investigates and takes appropriate remedial action to address violations. See procedures and standards in policy [EC-05 – Investigating Reported Concerns](#). To address situations promptly, concerns need to be brought to the attention of management as soon as possible. To support this process, individuals should be available, fully cooperate, and provide truthful information during investigations.
  - 4.4. Upon resolution of the matter, Employee and Labor Relations confirms with the reporting party that the matter has been investigated and resolved.
  - 4.5. Should the reporting individual disagree with resolution of the matter, the individual notifies Employee and Labor Relations. Such concerns are escalated to members of senior management for further review as appropriate based on the circumstances.
5. MHS prohibits action or treatment that is based on a protected characteristic(s) that is undertaken by or toward non-employees associated with MHS, including non-employee Workforce Members.
    - 5.1. This applies to complaints by or regarding all individuals who perform work or services, train, or volunteer for MHS at any MHS location, including but not limited to contractors, vendors, suppliers, students/trainees, student teachers/trainers, non-employees, and volunteers, as well as actions by and towards patients and visitors.
    - 5.2. Complaints regarding such concerns are reported to Employee and Labor Relations or the MEL hotline. Any such concerns are investigated and handled as appropriate based on the circumstances.
  6. Appropriate corrective action, up to and including termination of employment, is taken regarding individuals who violate this policy, as well as individuals who intentionally make false allegations or otherwise make complaints that are not in good faith.
  7. Policy of Non-Retaliation. MHS wants everyone to feel comfortable sharing concerns and asking questions without worrying about retaliation. It is MHS's policy that no individual is subject to retaliation or punishment for having made a good-faith complaint under this policy or for having participated in an investigation. Any concerns of retaliation should be reported immediately to Employee and Labor Relations or the MEL hotline. See policy [HR-80 - Non-Retaliation](#).
  8. Confidentiality. MHS takes every reasonable measure to maintain confidentiality during and after an investigation. MHS generally shares information only as necessary to investigate and take appropriate action, and only with those who have a need to know. MHS may need to report certain situations outside of MHS, such as to law enforcement or other authorities.

## 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 June 1991

Reviewed/Revised: March 1997, January 2000, June 2002, August 2007, September 2008, September 2015, August 2019, October 2020, October 2021, November 2024

## Approved

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MHS Policy Committee