



# The MetroHealth System

## Board of Trustees

Wednesday, September 25, 2024

11:00am - 1:00pm

The MetroHealth System Board Room K-107 or via Zoom

## Audit and Compliance Committee

## Regular Meeting

# The MetroHealth System Board of Trustees

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## AUDIT & COMPLIANCE COMMITTEE

**DATE:** Wednesday, September 25, 2024

**TIME:** 11:00am - 1:00pm

**PLACE:** MetroHealth Main Campus, Building K, Board Room (K107) or Zoom  
<https://us02web.zoom.us/j/89011110090>

## AGENDA

**I. Approval of Minutes**

Approval of Committee Meeting Minutes from July 31, 2024

**II. Information Items**

A. Ethics and Compliance Update – C. Briddell / S. Partington

**III. Executive Session**

Return to Open Meeting

**IV. Recommendation/ Resolution Approvals**

A. Resolution to Authorize and Approve Hire of Executive Director, Internal Audit Services

# The MetroHealth System Board of Trustees

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## AUDIT AND COMPLIANCE COMMITTEE

Wednesday, July 31, 2024

11:00 am – 1:00 pm

MetroHealth Brooklyn Hts. Campus, Building B, room B-102 and via Zoom

### Meeting Minutes

**Committee Members Present:** Maureen Dee-I, John Moss-I (late)

**Other Trustees Present:** John Corlett-R, Mike Summers-I (late), E. Harry Walker, MD-I

**Staff Present:** Christine Alexander, M.D.-I, Chris Briddell-I, Robin Barre-I, Nabil Chehade, M.D.-I, Kim Cunningham-R, David Fiser-I, Joe Frolik-I, Joseph Golob, MD-I, Derrick Hollings-I, Barbara Kakiris-I, Chistina Morales-I, Sarah Partington-I, Marlon Primes-I, Tamiyka Rose-I, Dalph Watson-I, Darlene White-I, Adam Winston-R

**Invited Guests:** Sophie Cambell-Smith-R

**Other Guests:** Guests not invited by the Committee are not listed as they are considered members of the audience, and some were not appropriately identified.

Ms. Dee called the meeting to order at 11:00 am.

(The minutes are written in a format conforming to the printed meeting agenda for the convenience of correlation, recognizing that some of the items were discussed out of sequence.)

### **I. Approval of Minutes**

The minutes of the March 27, 2024 Committee meeting were approved as submitted.

### **II. Information Items**

#### **A. Ethics & Compliance Update – S. Partington**

Ms. Dee introduced Sarah Partington, Senior Compliance Officer, and Director of Compliance Operations, to provide ethics and compliance program updates. Ms. Partington discussed compliance activity updates which includes 94% completion of the work plan year to date, and 87% completion of ethics and compliance policies reviewed and updated during the calendar year. The MetroHealth ethics line reported 204 cases opened, 186 cases closed, 62 inquiries and 124 allegations.



# The MetroHealth System Board of Trustees

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In May, the compliance team completed Medicare ground ambulance data collection submission on behalf of MetroHealth. Financial and cost report data, between 2020 – 2024, was submitted to the Centers for Medicare and Medicaid services as they selected various ground ambulance providers to understand their reimbursement rates for ground transportation. Failure to submit the data to CMS by May 31, 2024, would have resulted in a 10% rate reduction.

Ms. Partington introduced Kim Cunningham, Interim Privacy Officer, to provide privacy updates. Ms. Cunningham provided two updates on new rules related to change healthcare. The first update concerns the privacy of patients affected by a data breach incident, which was widely reported in the media. The second update is a rule that was finalized in response to the overturning of Roe vs. Wade, specifically protecting reproductive healthcare records. The Compliance team is currently determining how operations will work to ensure these special protections are in place.

## **B. External Auditor Selection Process Update – C. Morales**

Ms. Dee introduced Christina Morales, Corporate Controller, to provide an update on the external auditor selection process. MetroHealth completed a 5-year contract with RSM who provided auditing services with the initial contract term served from 2009 – 2014, a second term from 2014 – 2018 and a special approved extension from 2019 – 2023. The Auditor of State requires audits of public offices, and an Independent Public Accountant (IPA) will be engaged to perform the MetroHealth pool audit for 2024 – 2028. Firms are selected through a competitive bidding process. The request for proposal (RFP) process, IPA firm selection and contract with the selected firm is managed directly by the Auditor of State with input from MetroHealth regarding deliverables and timelines. Once the firm is selected, the contracting is overseen by the Auditor of State who will work through the transition of services between the previous firm and the newly selected firm. The selection of a firm will be completed by the end of August or early September.

## **III. Executive Session**

Ms. Dee asked for a motion to move into executive session to discuss hospital trade secrets as defined in ORC 1333.61. Mr. Corlett made the motion and Dr. Walker seconded. The Board held a roll call vote with all Trustees in attendance voting to approve the motion to go into executive session for the purposes stated by Ms. Dee.

Members of the public were excused. The Board went into executive session to discuss the identified matters at 11:23 am.



## The MetroHealth System Board of Trustees

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Following the executive session, the meeting reconvened in open session at approximately 12:49 pm and welcomed back the public who attended in person and via Zoom.

- IV. Recommendation/Resolution Approvals
    - A. Recommendation to Authorize a Third Party for Forensic Review
- The resolution was held.

There being no other business to bring before the Committee, the meeting was adjourned at approximately 12:58 pm.

THE METROHEALTH SYSTEM

Maureen Dee, Chairperson





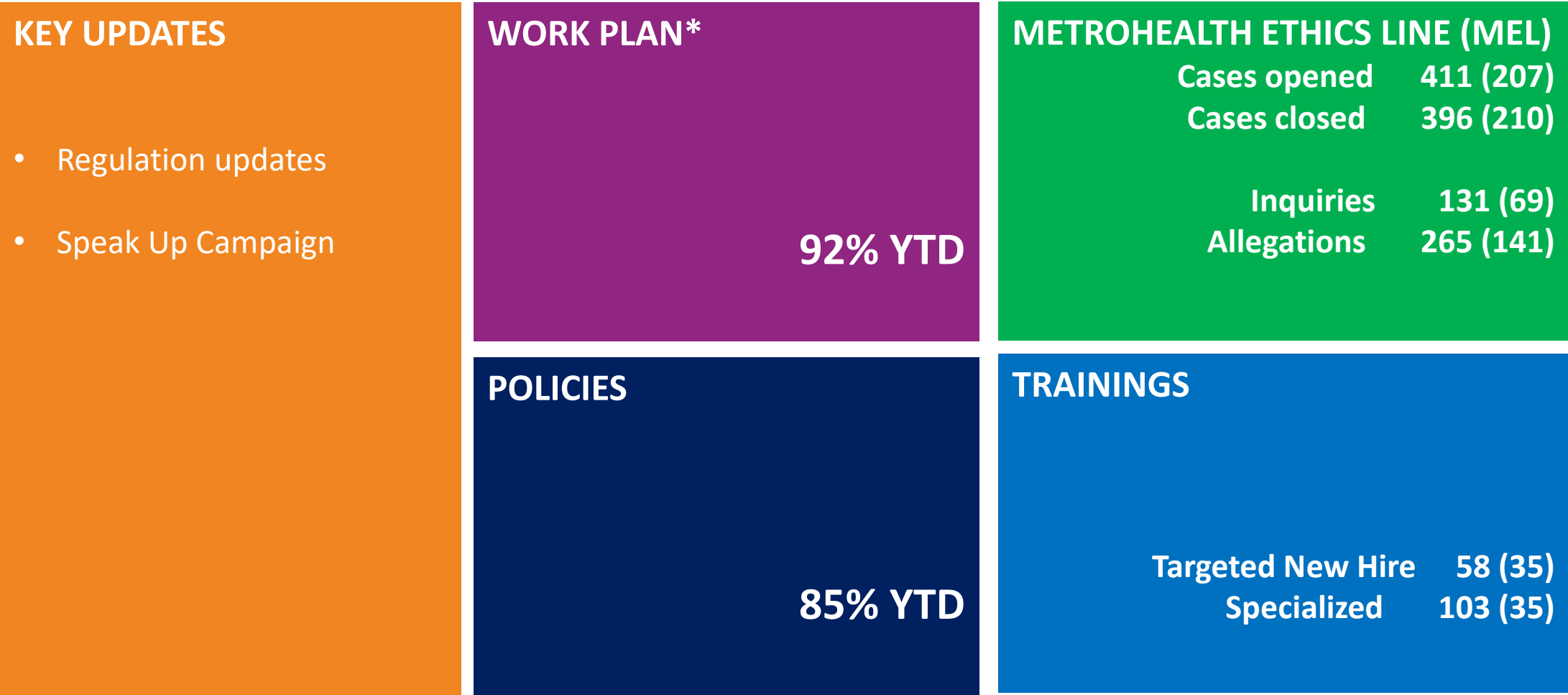
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# Ethics and Compliance Program Activities

Audit and Compliance Committee of the Board of Trustees

September 25, 2024

# Ethics and Compliance – By The Numbers



\* See Appendix for additional information

# By The Numbers - Legend


Workplan	
Data	% completion based on targets set for end of quarter (through Q2)
MetroHealth Ethics Line (MEL)	
All data	YTD (Q2)
Inquiries	MEL submission that does not allege wrongdoing; seeks guidance
Allegations	MEL report that involves an accusation of wrongdoing by an MHS workforce member (employee, vendor, etc.)
Policies	
Data	% of Ethics and Compliance policies updated during the calendar year (through Q2)
Training	
All data	YTD (Q#) (through Q2)
Targeted New Hire	Trainings by Ethics and Compliance team beyond general orientation
Specialized	Trainings on specific topics (new regulations, billing and coding issues, etc.)











# Overview of Speak Up Campaigns



## Speak Up. Listen Up. Follow Up.



At MetroHealth, we promote a speak up culture where raising concerns is encouraged. We listen to those who raise concerns and we take action to address the issues. This guide provides more information about speaking up and what happens when a report is made.

<p><b>When we see something we SPEAK UP.</b></p> <ul style="list-style-type: none"><li> Utilize <u>TeamSTEPPS</u></li><li> Talk to your supervisor</li><li> Contact Human Resources</li><li> Contact Ethics and Compliance</li><li> <b>Report to MEL:</b> Call, text or file a report, 24 hours a day. See <b>MORE INFORMATION.</b></li></ul>	<p><b>After an issue is reported, we FOLLOW UP.</b></p> <p>Investigators may need more information to investigate a report filed using MEL. Reporters can check back to see if more information is needed.</p> <p>When reporting anonymously, MEL provides an access number to obtain updates or to communicate with the investigator.</p> <p>When investigators close a case, they provide a general summary and outcome of the case.</p> 
<p><b>When employees raise concerns, we LISTEN UP.</b></p> <p> When we receive a MEL report, we investigate.</p> <p> Often employees make reports to colleagues or managers, when hearing reports we all listen up.</p>	<p><b>More Information</b></p> <p>The Speak Up page on the Ethics and Compliance Portal (see web address below) provides additional resources. Review the <u>MEL Reference Guide</u> for how to report anonymously, follow up on your reports and more.</p> <p><a href="https://ethics.metrohealth.org">ETHICS.METROHEALTH.ORG</a></p> <p><small>Revised: December 2023</small></p>

# Launching a new Speak Up campaign

Campaign focuses on educating employees on where and how to report specific issues.



The poster is titled "Speak Up" and "MetroHealth Reporting Options". It is divided into several sections with colored backgrounds: orange for Managers/Supervisors, blue for Ethics and Compliance, pink for People Division (ELR), purple for MetroHealth Ethics Line (MEL), and teal for Origami. Each section lists specific reporting options and includes a QR code. The bottom section is green and titled "More Reporting Options", pointing to the MHS Reporting Guide. The footer includes the date "September 2024" and contact information.

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## Speak Up

### MetroHealth Reporting Options

**Managers/Supervisors**

- Report concerns first with a supervisor or department leader
- If this is uncomfortable, use one of the other reporting options

**Ethics and Compliance Department**

Report concerns or ask questions about ethics and compliance matters including:

- Business conduct (vendor interactions, gifts)
- Patient Privacy
- Conflicts of Interest/Outside Activities
- Fraudulent billing/documentation

Contact Ethics and Compliance

- Email: [compliance@metrohealth.org](mailto:compliance@metrohealth.org)

**People Division (Employee and Labor Relations (ELR))**

Report concerns or ask question about employee and labor relations issues such as:

- Discrimination
- Harassment
- Retaliation
- Violation of STAR-IG values
- Workplace Safety Concerns
- Other Employee & Labor Relations matters
- Other HR Policy Matters

Contact the People Division (ELR)

- Email: [laborrelations@metrohealth.org](mailto:laborrelations@metrohealth.org)
- Phone: 216-559-9425
- In-person: HR Office (Main Campus) Hammon Bldg S1-103

**MetroHealth Ethics Line (MEL)**

- Report any ethics and compliance matter
- Ability to file a report and follow up anonymously

• Call: 216-778-1660

• Text: 216-600-1456

• Visit: [www.metrohealth.org/compliance](http://www.metrohealth.org/compliance)

**Origami**

Report incidents of:

- Patient Safety Events
- Employee Safety Events (events that have employee injuries – Worker's Compensation)
- Legal Events (damaged MetroHealth property, injuries to non-employees or patients on MetroHealth property)

Submit a report through the Origami platform from any MetroHealth computer

**ORIGAMI RISK**  
Origami Risk

**More Reporting Options**










See more reporting options in the [MHS Reporting Guide](#).

Ethics and Compliance - September 2024 - Questions? Contact us at [compliance@metrohealth.org](mailto:compliance@metrohealth.org)

- Multi-disciplinary team
- Comprehensive communication plan
- Encourages employees to report issues to managers
- Reporting guide directing employees to other resources

# Appendix

# The first six months of the 2024 Ethics and Compliance Work Plan consists of 42 total focus areas and is 92% complete.

340B		5 focus areas / 12% of Work Plan	<div><div></div></div> 100%
Culture of Ethics		5 focus areas / 12% of Work Plan	<div><div></div></div> 90%
Documentation & Coding		2 focus areas / 5% of Work Plan	<div><div></div></div> 80%
MetroHealth Initiatives		0 focus area / 0% of Work Plan	<div><div></div></div> 0%
New/Changed Regulatory Schemes		4 focus areas / 10% of Work Plan	<div><div></div></div> 100%
Privacy		1 focus areas / 2% of Work Plan	<div><div></div></div> 60%
Vendor Risk Management		3 focus areas / 7% of Work Plan	<div><div></div></div> 80%
Virtual Operations		0 focus areas / 0% of Work Plan	<div><div></div></div> 0%
Required Compliance Activities		22 focus areas / 52% of Work Plan	<div><div></div></div> 95%

## Authorization and Approval to Hire Executive Director, Internal Audit Services

### RESOLUTION \_\_\_\_\_

WHEREAS, The Audit and Compliance Committee ("Committee") of the Board of Trustees ("Board") of The MetroHealth System ("System") established a job description for an Executive Director, Internal Audit Services ("Executive Director") to assist the Committee in their oversight responsibilities for internal audit activities at the System;

WHEREAS, the Executive Director shall have direct and independent functional reporting to the Chair of the Committee and administrative reporting the System's SVP/Chief Ethics, Risk, and Compliance Officer ("Ethics Officer");

WHEREAS, the Executive Director shall work in collaboration with the System's external audit partner to promote sound risk management and internal control and governance activities that are consistent with industry best practices and applicable federal and state rules and regulation; and

NOW, THEREFORE, BE IT RESOLVED, that the Board hereby authorizes the Chair of the Committee in collaboration with the Ethics Officer to make an offer of employment to the final candidate for the position of Executive Director and negotiate and execute the final terms of their employment.

AYES:

NAYS:

ABSTAINED:

ABSENT:

DATE: