



This Is Who We Are

Promoting the Well-being
of Our Patients

Caring for the Health
of Our Community

Collaborating
as a Team

Protecting Our
Information
and Resources

Maintaining a Culture
of Ethics
and Compliance

Our Ethics and
Compliance Program

Closing Thoughts

Additional Resources



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Our Culture of **Ethics and Compliance**

Principles of Our Code



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- 1** We are true to who we are, to our mission and to our values.
- 2** We deliver high-quality care to help our patients achieve optimal health.
- 3** We only access, use or disclose patient information for appropriate business reasons.
- 4** As a team, we sustain a safe and inclusive working environment where everyone's contribution is valued and respected.
- 5** We are fair and honest in our dealings with each other, our business partners, suppliers and vendors.
- 6** We follow our policies to ensure MetroHealth's assets are used for business purposes.
- 7** We identify and report conflicts of interest – avoid them when we can and manage them when they are unavoidable.
- 8** We are empowered to speak up whenever we believe our values, policies or the law are being violated or have questions about doing the right thing.
- 9** We support those who raise concerns and never tolerate retaliation.
- 10** We are public employees and are committed to the highest standards of ethics and compliance in everything we do.





A Message from Dr. Akram Boutros

I am proud to be part of the MetroHealth family and proud of the work we do to meet the needs of our patients and our community.

We are unique in many ways. We are a mission-driven public health system that is gaining national recognition, but our real motivation is our commitment to our community. As we continue to grow and transform, I know that we will always stay true to our mission, and we will always act with integrity and deliver high-quality care.

This Is Who We Are is our Code. I know you will use it as a resource for guiding decisions and interactions with each other. I encourage you to read it carefully. While this document won't address every situation you might face, it will help you integrate our values into everyday practice.

Your commitment to uphold the Code is vital to maintaining the public trust and confidence we have all worked so hard to build. If you know of unsafe practices, unethical behavior or violations of our Code, a MetroHealth policy or procedure or any applicable law or regulation, I urge you to speak up. I assure you we will deal with all problems that you bring to our attention.

I believe the high quality of our team and our strong commitment to ethics and compliance are essential for our growth and success. Together, we will make sure that MetroHealth continues to be a source of pride for us and our community.



Akram Boutros, MD, FACHE
President and Chief Executive Officer



Our Mission, Vision and Values

Our Mission

Leading the way to a healthier you and a healthier community through service, teaching, discovery and teamwork.

Our Vision

MetroHealth will be the most admired public health system in the nation, renowned for our innovation, outcomes, service and financial strength.

Our Values

Service to Others

We strive to meet the needs of our patients first, by serving with compassion and advocating for the well-being of the community, especially those without the ability to pay.

Teamwork

We establish an environment of trust and engagement that focuses on the needs of the organization in order to leverage our collective strengths to do the right thing for our patients and colleagues.

Accountability

We accept responsibility for the decisions we make, the outcomes achieved and our personal behavior.

Respect

We treat everyone equally with dignity, candor, compassion and empathy.

Inclusion and Diversity

We foster a community where our differences are celebrated and everyone has an opportunity to be part of our success.

Quest for Excellence

We exemplify the highest standards of patient-centered care and continue to improve through discovery and innovation.



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We are the resilient ones.

Our mission lifts us up. Inspires us to improve the health of all who live here.

[Because the health of everyone in our community matters.](#)

This steadfast pledge to the well-being of all people – without discrimination – lives deep in the heart of everyone who works here.

[Together, we innovate, educate and transform.](#)

We are not afraid to challenge the status quo. We will continue to put people in our community first because, for us, it has always been the right thing to do. We are knocking down the walls of convention, boldly redefining the delivery of care. Because right now health care can't afford business as usual.

We believe in collaboration.

For ours cannot be a truly great city for health without all of us working together.

Our work to improve the health of every single person in our community is too important to remain hidden in the shadow of giants.

But, we don't do it for the glory. We do it for everyone in Cuyahoga County.

[We are exceptional clinicians with extraordinary hearts.](#)

We are MetroHealth.

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About Our Code – *This Is Who We Are*

Our Culture of Ethics and Integrity

Every organization has its own unique culture. At MetroHealth, our culture is defined first and foremost by **what we do** – improve the health and well-being of the people in our community.

How we do what we do is equally important and also defines our culture. We demonstrate our values in every interaction. We work as a team. We respect each other. We are diverse, inclusive and engaged. We skillfully care for our patients and we provide the same high-quality care to everyone – regardless of their circumstances.

We are also defined by **how others see us**. Our patients, their families, researchers, business partners, neighbors and other care providers trust that we will do what we say, always strive for the highest quality and honor our commitments to our patients, our employees and our community.

This is our culture. It is defined by what we do, how we do it and how others see us.

It is a culture of ethics and accountability.

Maintaining a culture of ethics is not always simple and for that reason we have developed our Code – ***This Is Who We Are***. It is intended to help us put our values into practice so that we can maintain our culture of doing the right thing.

*Culture is the written
and unwritten rules,
the common ways of
doing things and the
informal processes that
account for the way
things get done.*



About Our Code

– *This Is Who We Are* (Cont.)



“We lead by example and are accountable for our actions, successes and failures.”

– Director, Learning and Performance

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Using Our Code

Our Code is designed to be a reference tool and a “one stop” guide summarizing our policies and the laws and regulations we must follow. Throughout the Code, links are provided to more detailed MetroHealth policies. If you do not find the information you’re looking for in the Code, contact the Ethics and Compliance Department.

The MetroHealth Board of Trustees has approved the Code. The Ethics and Compliance Department periodically reviews it and presents proposed updates for the Board’s review and consideration.



Who Must Follow the Code?

Everyone who works at The MetroHealth System (“MetroHealth”) must follow our Code as well as related policies and procedures; this includes the Board of The MetroHealth System and all affiliate Boards, all employees and medical staff members.

We also expect anyone acting on our behalf to conduct themselves in a manner consistent with our Code and applicable policies. This includes volunteers, visiting or contract health care providers, researchers, vendors, suppliers and consultants.

To Learn More

See [PC-25: Medical Ethics](#)

See [EC-02: Code of Conduct and Certification](#)

Ethics in health care touches many areas: clinical, financial, recordkeeping, etc. Ethical issues that involve clinical care, such as end of life decisions, are guided by our clinical Ethics Committee.



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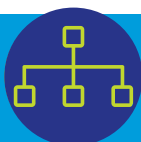
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Our Responsibilities

All of us have a role to play in protecting MetroHealth's reputation; doing our part means that we have the following responsibilities:

- Be familiar with and follow the information contained in this Code, as well as the MetroHealth policies, laws and regulations that apply to you and your job.
- Ask questions and report concerns.
- Remember that in your work role, you represent MetroHealth to our patients and the public. Every interaction you have with others while performing your job reflects on our reputation. Always act in a professional, honest and ethical manner when acting on behalf of MetroHealth.
- Work as a team and treat others respectfully.
- Cooperate and be truthful when responding to an investigation, inspection or audit.
- Complete all required ethics and compliance training.
- Certify that you have read, understood and follow this Code.



Leaders Have Additional Responsibilities

If you serve in a management position at MetroHealth, you have additional responsibilities:

- Set an example for others to follow.
- Ensure employees understand the policies, laws and regulations that apply to their work.
- Be approachable. Maintain an environment where others can comfortably ask questions or raise concerns.
- Be respectful and provide appropriate and timely responses to questions or concerns.
- Assess developing circumstances quickly and accurately, keeping the Ethics and Compliance Department informed of potential compliance concerns.
- Be consistent when enforcing our standards and holding people accountable for their behavior at work.
- Never ask or pressure anyone to do something that you would feel uncomfortable or are prohibited from doing yourself.
- If you supervise third parties, make sure that they understand their obligations and our expectations. Also see **Fair Dealing with Business Partners, Suppliers and Vendors.**



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“We do what is
right, including speaking
up when something
is wrong.”

– Manager of Professional
Coding and Reimbursement

Making Good Decisions

Making good decisions is not always easy. At times you
will be under pressure or may be unsure of what to do.
When faced with a difficult decision, ask yourself:



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“We can’t fix
problems we don’t know
about, so when you
ask questions or report
problems, you are
helping us meet the
highest levels of ethics
and compliance.”

– Chief Quality Officer

Reporting Concerns

If you see or suspect a situation that may be a violation of our values, this Code or the law, you should speak up. When you report concerns, you are protecting our patients, yourself, your co-workers, as well as the reputation of MetroHealth. **Remember: An issue cannot be addressed unless it is brought to our attention.**

In most cases, your supervisor should be your first point of contact. He or she is likely in the best position to understand your concern or question and take the appropriate action. However, if you’re uncomfortable speaking with your supervisor, your supervisor is unable to answer your question, or if you have already shared a concern and believe it’s not being addressed, you have these additional options:

- Discuss the issue with any member of management.
- Talk to **Human Resources, the Legal Department, or the Ethics and Compliance Department.**
- At any time, you may contact:
The MetroHealth Ethics Line (“MEL”) at 216-778-1660 or at www.metrohealth.org/compliance.



Meet MEL

MEL is a confidential way to ask questions, seek guidance and report possible concerns.

- MEL is independent from MetroHealth and is staffed by third-party ethics and compliance specialists.
- Translation services are available.
- You may call MEL 24 hours a day, 7 days a week.

When you contact MEL the operator will listen, ask questions if necessary and then write a summary report. The summary will then be provided to MetroHealth for assessment and

further action. You can also file a complaint or submit an inquiry electronically.

You can choose to report anonymously. Unless you choose to identify yourself, MetroHealth will not be able to determine who called, or who filed a report with MEL.

It is important to provide as many details as possible (e.g., who, what, when, where). Because MetroHealth may need additional information, you will be assigned a report number and asked to call back or log in at a later date to answer any follow-up questions or to check on the status.



Reporting Concerns (Cont.)

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Urgent Patient Safety Matters

If you are involved in, or become aware of, a serious patient safety event, promptly contact your immediate supervisor. If the event involves imminent harm and your immediate supervisor is not available, contact the Administrator on Call who will notify others.

Patient Care Issues

If you have a concern regarding a patient's safety or care, then you must file a report through the Safety Event Reporting System. Every MetroHealth computer has the SER application that allows you to file a report. These reports should be filed as soon as possible, but before the end of your work shift.

Patient Complaints

If you are aware of a patient requesting to file a complaint, direct the patient to the Office of Patient Experience.

Urgent Employee and Visitor Safety

If you believe there is an immediate threat of harm to an employee or visitor, immediately contact our Department of Public Safety.



Investigations and Confidentiality

Any information provided through MEL or through any other reporting channel will be treated confidentially to the extent permitted by law or as the investigation allows. If an investigation is needed, it will be conducted by the Ethics and Compliance Department and may also involve other MetroHealth personnel, departments or external resources. Some investigations may be directed by the Legal Department under the attorney-client privilege. We may be required by law to report certain types of activities.



Reporting Concerns (Cont.)



No Retaliation

We want everyone to be comfortable sharing concerns and asking questions without worrying about retaliation. We take claims of retaliation seriously; they will be investigated, and if substantiated, retaliators will be disciplined up to and including termination of employment.

If you believe you have been retaliated against, you should contact your supervisor, or consult **the additional resources** listed in this Code.

Regardless of the type of alleged or actual wrongdoing reported or the method of reporting, we will not tolerate retaliation against anyone who reports a concern in good faith about an alleged misconduct.

Q Three months ago, I called MEL anonymously. I was concerned that my supervisor awarded a contract to a medical supply company owned by his friend. It was investigated and I understand some action was taken. Since then, my boss and others have stopped speaking to me and copying me on important communications, and I am worried this will affect my performance. I believe my colleagues know I made the report and are retaliating. Is it retaliation? What should I do?

A This could be a case of retaliation. Contact MEL or use any of **the additional resources** listed in the Code to report your concerns. A thorough investigation will take place to find out what has led to your colleagues' behavior. If the investigation determines that they were retaliating because of your report, appropriate action will be taken.

Accountability

Violations of this Code, our policies, laws or regulations can result in serious consequences for you individually, and for MetroHealth. We investigate all reported violations, and if substantiated, any violations may result in disciplinary action up to and including termination of employment.

To Learn More

See **HR-36: Infractions Subject to Corrective Action**

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Promoting the Well-being of Our Patients

“At MetroHealth, we are professional, compassionate people who truly embrace the MetroHealth mission and always go above and beyond to provide excellent care, not just according to care plans, but considering our patients’ emotional, social and medical needs.”

— Lactation Specialist

- Delivering Quality Care
- Patient Rights
- Protecting Patient Information
- Academic and Research Standards





“Working at MetroHealth means using our strengths and resources collectively for the common goal of providing the highest quality care for all patients.”

– Process Improvement and Clinical Practice Specialist

Delivering Quality Care

We are committed to providing safe, equitable, high-quality care in a manner that is sensitive to our patients’ individual needs. We work to promote an atmosphere that strongly supports the highest quality of care and to document that care accurately and thoroughly.

This Is Who We Are

- We always treat our patients, their families and loved ones with respect and dignity.
- We are responsive to individual health care needs, making every reasonable effort to accommodate individual preferences and rights.
- We seek to involve patients in all aspects of their care.
- We work together to maintain a safe and caring environment for patients and staff that respects each person and treats everyone with dignity.
- We only provide clinical services that are indicated and are within the scope of our education, skill and license or clinical privileges.
- When problems occur involving patient care, we hold ourselves and each other accountable. We find the cause and develop systems-based solutions to improve our delivery of care methods.



In providing high quality of care we are focused on supporting the needs of the patient; we leverage interdisciplinary team-based care to create an overall culture that makes patient safety paramount.



MetroHealth

Delivering Quality Care (Cont.)

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Q

I am a nurse and a provider asked me to document in the medical record that the patient consented to a procedure. However, I don't feel that the provider met the basic standards for obtaining consent. The patient is non-English speaking and the provider did not use an interpreter. Should I document that consent was obtained?

A

No. You should use the TeamStepps tools and raise the concern with the provider. If the provider still requests you to document the consent in the record (or if you feel the provider should document consent in the record), you should contact your supervisor immediately.

Q

I have repeatedly paged a doctor regarding a patient, and she has not responded. What should I do?

A


If a physician does not respond to a page regarding a patient, ask your supervisor, or other appropriate member of leadership for assistance. If patient safety is a concern, contact the Administrator on Call.

To Learn More

See [TeamStepps](#)

See [Quality Institute SharePoint](#)





“Working at Metro means caring for people of every ethnicity, gender, demographic, social group, and walk of life. We open our arms to anyone who needs help, regardless of their situation.”

— Clinical Nurse

Patient Rights

When we listen to our patients, protect their rights and preserve their dignity, we honor the trust they have placed in us. We always strive to provide appropriate and impartial access to care.

We promote patient safety and autonomy in care decisions and treatment choices. We are responsible for making sure that our patients are aware of their rights and we always encourage them to speak openly with their health care team.

This Is Who We Are

- We serve all patients without considering age, race, ethnicity, religion, culture, national origin, citizenship, language, physical or mental disability, socioeconomic status, ability to pay, sex, sexual orientation, gender identity or expression or any other legally protected characteristic.
- We recognize that some patients may need additional resources to help us best serve them (such as language access services for a patient with limited English proficiency).
- We help patients understand and exercise their rights.
- We listen to and respect patient decisions regarding care, consent for treatment or changing or withdrawing treatment.
- We provide accurate and timely responses to patients’ questions.
- We promptly report any suspicions or evidence of abuse, neglect, harassment, intimidation or exploitation of a patient.

To Learn More

See [PC-15: Patient Rights and Responsibilities](#)

See [EC-32: Emergency Medical Treatment and Active Labor Act \(EMTALA\)](#)



Emergency Treatment

We follow the Emergency Medical Treatment and Labor Act (“EMTALA”) which includes providing emergency medical screening examinations and necessary stabilizing treatment to all patients, regardless of their ability to pay.



Protecting Patient Information

Our patients trust us with sensitive and personal information about their health. We routinely collect information about medical condition, history, medications and family illnesses to provide quality care. We realize the sensitive nature of this information and that we have a responsibility to maintain its confidentiality.


MetroHealth is committed to protecting our patients’ information by following the Health Insurance Portability and Accountability Act (HIPAA) and the Health Information Technology for Economic and Clinical Health Act (HITECH), state confidentiality laws and MetroHealth privacy policies. This means we access, use and/or disclose a patient’s medical information (whether it exists in oral, written or electronic form) only when we have a legitimate business reason for doing so, all authorizations are received, or it is required by law.

Violating privacy laws and our policies can have serious consequences up to and including termination of employment. Additionally, state and federal privacy laws provide for civil and criminal penalties for individuals and MetroHealth including potential fines, imprisonment and loss of professional license.

This Is Who We Are

- We are committed to protecting our patients’ information and privacy as vigorously as if it were our own personal information.
- We safeguard our patients’ confidential information against unauthorized access, use and disclosure.
- We do not discuss patient information with anyone, including co-workers, family or friends, unless they have a legitimate need to know.
- We do not mention or make reference to patient-identifying information ever on social media, social networking sites or blogs.
- While we care about our colleagues at work, we do not share information about services they receive as a patient of MetroHealth except to those involved in their care or who have a need to know based on their job.
- We avoid discussing confidential patient information in places where others might overhear what is being said, such as on elevators, visitor or common areas or when using the telephone in non-private areas.

Protected Health Information (PHI) is any information about health status, provision of health care or payment for health care that is created or collected and can be linked to a specific individual.



Protecting Patient Information (Cont.)



“As a new employee, I couldn’t have been more impressed by the training, processes, and initiatives all designed to keep our patients’ information secure.”

— Director of Marketing

Q
A

As an employee of MetroHealth, can I look at my own medical information in Epic or other systems that I have access to?

No, you cannot access your medical information in Epic or other systems that you have access to as a result of your employment. You must access your information only through a patient portal such as “MyChart” or by making a request through the Medical Records Department.

Q
A

If I take care of a fellow employee who is hospitalized at MetroHealth, can I tell my other colleagues that our co-worker is ill?

No, you may only discuss need-to-know information with other employees involved in the employee-patient’s care. The employee-patient is responsible for sharing his or her medical condition with their supervisor and other colleagues.

To Learn More

See [PR-01 Use and Disclosure of Protected Health Information](#)

See [PR-21: Maintaining the Confidentiality of Patient Information](#)



Appropriate Use and Disclosure of PHI

We only use or disclose patient information when we have a legitimate business reason to do so.

Appropriate business reasons include:

- Treatment – Providing care to the patient
- Payment – Providing PHI as requested by an insurance company to receive reimbursement
- Operations – Reviewing PHI while conducting internal reviews or audits

Inappropriate reasons include:

- Mere curiosity
- Checking the lab results of a friend even at the friend’s request
- Texting a photo of a patient’s face or other image along with identifying information
- Responding to requests from unauthorized friends or family
- Responding to requests for patient-identifying or other confidential patient information from the news media or postings on social media
- Responding to requests from third-party non-providers without written authorization from the patient



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“We believe research is an important part of health care delivery and is at the heart of all medical advances.”

— VP of Research and Sponsored Programs

Academic and Research Standards

We conduct basic and clinical research, acting responsibly and with scientific integrity. Our priority is to protect the rights and well-being of patients and human subjects. We respect their rights and welfare during research investigations and clinical trials.

Any research conducted at MetroHealth is approved in advance by the Institutional Review Board; all approved research protocols are strictly followed. Our research participants are fully informed of the risks, expected benefits and any possible alternatives regarding treatment. We provide proper care and treatment of any animals used in our research.

This Is Who We Are

- We follow the highest ethical standards in full compliance with federal and state laws and regulations in any research, investigations and/or clinical trials conducted by our physicians and professional staff.
- We investigate any situation that may put our subjects at risk.
- We do not tolerate acts of plagiarism, falsification, fabrication of data or other forms of scientific misconduct.
- We avoid conflicts of interest and do not participate in any relationship or activity that could influence or appear to influence our ability to protect research participants or compromise the validity of research results.
- We comply with all requirements, terms and conditions of grant awards and contracts.
- We readily participate in training and education to improve our knowledge of regulatory requirements.
- We report to our direct supervisors or to MEL any known or perceived wrongdoing that could potentially affect our subjects’ well-being. Our responsibility to speak up relates to many areas of research where wrongdoing could occur including grant mismanagement, failure to protect subjects and data security/privacy.



Academic and Research Standards (Cont.)



“Working together gives us the opportunity to educate, innovate, and transform. Never be afraid to challenge the status quo.”

— Chairperson, Department of Medicine

Q
A

I realized I made a mistake in recording data for one research subject, but the data was not final. Is that considered misconduct?

No. Making a mistake is not intentional misconduct. It would be a violation if you knew there was a mistake and did not take steps to correct it and then knowingly included the data in the final results. If you become aware of a mistake, correct that subject’s data and notify the study’s principal investigator.

Q
A

If I am aware of a patient who might be a suitable candidate for a certain research study, may I discuss it with the patient and share his contact information with the researcher?

Yes. As long as you obtain proper authorization from the patient and all privacy and confidentiality rules are followed.

To Learn More

See [EC-42: Research or Scientific](#)

See [GEN-48: Technology Development & Transfer](#)



Intellectual Property

We are committed to the exchange of ideas and research findings with the broader academic and health care community.

Whenever research results have the potential for commercialization, we take appropriate steps and protect the inventors’ and MetroHealth’s intellectual property ownership interests.



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Caring for the Health of Our Community

“We will continue to put people in our community first because, for us, it has always been the right thing to do. We are knocking down the walls of convention and redefining the delivery of care.”

– From *Our Manifesto*

- Our Commitment to the Health and Well-being of Our Community
- Fair Dealing with Business Partners, Suppliers and Vendors
- Public Policy and Political Activities
- Speaking on Behalf of MetroHealth
- Environmental Sustainability





“To work at MetroHealth means that I am serving the community that I care so much about, and it doesn’t even feel like work when you are making a difference.”

— Advance Practice Registered Nurse Provider

Our Commitment to the Health and Well-being of Our Community

With an unwavering commitment to our community, we welcome the opportunity to care for patients from all walks of life. We believe that the diversity of patients and our staff enriches our environment and gives us an informed world view.

We are a unique organization. **Our Mission, Vision and Values** are an undeniable statement of our commitment to service and the well-being of our community. Our commitment is not only demonstrated by the care we provide for the ill and injured, we also know that a healthier community requires us to be proactive and engaged at the forefront of preventive care.

This Is Who We Are

- We treat every patient, whether economically needy or economically comfortable, with the same level of attention – full attention.
- We respect our family members/significant others and do not provide care to them unless it is an emergency.
- We advocate for access to equitable and appropriate health care for all.
- We respect the diverse cultures and personal backgrounds of our patients and each other.
- We understand that treating the whole patient and understanding his or her circumstances are essential components of care.
- We not only treat the patient’s current illness or injury, we assist with preventive care and help improve each patient’s overall well-being.

To Learn More

See [PC-04: Employees Providing Care for Family Members/Significant Others](#)





“We are committed to utilizing diverse business partners, suppliers, and vendors in support of our community.”

– Director of Transformation and Transition

Fair Dealing with Business Partners, Suppliers and Vendors

The work and support of our business partners, suppliers and vendors is key to our success. They have a right to expect that they will be treated lawfully and in an ethical manner.

We always select business partners, suppliers and vendors on the basis of objective criteria, not based on personal relationships or friendships.



Supplier and Vendor Diversity

We recognize the importance and benefits of a diverse, local and regional supplier and vendor base.

We help develop and maintain a strong supplier and vendor base that reflects the diversity of the community in accordance with all applicable laws. This includes doing business with LGBT, minority, small business, veterans and female business enterprises.



Key Definitions

Business Partner

– Typically a company or organization (i.e., a group purchasing organization) with whom we do a significant amount of business, and is integral to our operations.

Supplier – A general term to refer to providers of products or goods.

Vendor – A general term to refer to providers of services.

This Is Who We Are

- We never take advantage of anyone through manipulation, misuse of confidential information, misrepresentation of facts or any other unfair dealing or practice.
- We conduct our business relationships with honesty, fairness, mutual respect and without discrimination.
- We protect the confidential and proprietary information of our third-party partners.



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Fair Dealing with Business Partners, Suppliers and Vendors (Cont.)



Additional Responsibilities of Our Leaders

Our leaders who work with business partners, suppliers and vendors have an additional responsibility to follow our procurement policies that ensure a fair and objective proposal review and evaluation process. In addition, our leadership:

- Works with our business partners, suppliers and vendors to ensure that they understand our commitment to ethics and compliance.
- Selects goods and services on the basis of quality, effectiveness, economy and need.
- Employs fair business practices when working with business partners, suppliers and vendors.
- Watches out for any signs that our business partners, suppliers and vendors are violating applicable law or regulations.
- Insists on honest accounting of time, materials and acceptance of prompt deliverables on time to meet our standards.
- Discloses any situation that may appear to involve a conflict of interest.

Q
A

As a public employee, are there any restrictions if I leave and take a job with a company that does business with MetroHealth?

Yes, under the Ohio Ethics law, there are specific restrictions that can affect your ability to work at a company that currently has a business relationship with MetroHealth or is seeking to do business with us. You should contact the Legal Department or Ethics and Compliance Department for guidance.

To Learn More

See [GEN-05: Procurement, Management and Disposal of Products](#)

See [GEN-88: Procurement and Management of Professional Services](#)



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“When individuals commit themselves to working together for a cause, they have more power than they know to make a positive difference in the lives of others.”

— Family Medicine Physician

Public Policy and Political Activities


It is important to separate personal and MetroHealth-related political activities in order to comply with the applicable rules and regulations.

We believe in the rights of our employees to participate in the political process, but if we choose to be politically active, we must do so as individual citizens on our own time and at our own expense.

In accordance with applicable laws, MetroHealth exercises its right and responsibility to make its position known on relevant policy issues to government leaders, when appropriate. From time to time, leadership will invite employees to advocate MetroHealth’s priorities with legislators who have jurisdiction over health policy and funding decisions.

MetroHealth’s government relations staff are registered lobbyists and are authorized to advance MetroHealth’s positions with government agencies and leaders. All public policy or political activities on behalf of MetroHealth must be approved in advance by Government Relations.

As a public entity, MetroHealth cannot ask employees to support or oppose a political candidate, party or ballot issue. In addition, MetroHealth cannot use public funds for these purposes.



Public Policy and Political Activities

(Cont.)

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This Is Who We Are:

- When publicly discussing politics we always make it clear that our views and actions are our own and not those of MetroHealth unless authorized to do so.
- When public policy significantly impacts patients or MetroHealth business interests, senior leadership may engage employees in voluntary advocacy effort to protect patients and MetroHealth.
- As a public employer, MetroHealth does not endorse or contribute to political campaigns or causes. As individuals, we never coerce others to contribute to, support or oppose any political candidate or party, and we do not solicit contributions or distribute political literature during work time or on public property or using public resources such as email and work telephones.
- We do not use our work email address or MetroHealth assets to support or oppose political candidates or to print, communicate or forward political candidate or political party messages to others.
- We delete any political or campaign messages we receive.
- We never make political campaign contributions on behalf of MetroHealth.

Q

I am supporting a local political candidate who openly supports MetroHealth and the work we do. May I speak out at her campaign event and identify myself as a MetroHealth employee?

A

No. MetroHealth does not endorse or contribute to any political campaigns or causes, so it would be inappropriate for you to use your position as a MetroHealth employee to support her campaign.

Q

As an employee I have received requests from leadership encouraging me to follow up with government leaders about Affordable Care Act and Medicaid policy matters. Are we violating the law?

A

No. As a public entity we are permitted to approach our employees to raise awareness about policy matters that could help or hurt the interests of our patients and business. We may not however encourage employees to support or oppose a particular party or candidate.

To Learn More

Contact Government Relations at govrelations@metrohealth.org



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“Think carefully
before you hit the ‘send’
button in an email or
a text.”

– Release of Information
Specialist

Speaking on Behalf of MetroHealth

We need a clear and consistent voice when providing information to the public and the media. For this reason, it is important that only formally designated employees speak publicly on behalf of MetroHealth.

This Is Who We Are:

- Unless you are authorized to do so, never give the impression that you are speaking on behalf of MetroHealth in any communication that may become public.
- We always obtain approval from Media Relations before making public speeches, writing articles for professional journals or engaging in other public communications when speaking on behalf of MetroHealth. If you are speaking publicly on your own behalf, approval is not necessary but you should make clear that “the opinions shared are yours and not those of MetroHealth”. This includes presentations made at professional and scientific conferences.

Representing MetroHealth

Public presentations on behalf of MetroHealth are an excellent way to share information and engage with others, but before you share your presentation, ask yourself the following questions:

- Could this activity impact MetroHealth’s reputation?
- Are my comments objective and factual?
- Does the presentation reveal MetroHealth non-public information or any other confidential information?
- Are you prepared to answer any questions about MetroHealth from the audience unrelated to the specific topic?
- Is it possible your comments could be misleading if taken out of context?
- If applicable, do you know what the rules are for reporters attending the activity?
- Never ask or pressure anyone to do something that you would feel uncomfortable or are prohibited from doing yourself.
- If you supervise third parties, make sure that they understand their obligations and our expectations. Also see **Fair Dealing with Business Partners, Suppliers and Vendors.**

To Learn More

See [GEN-80: Social Media](#)

See [GEN-32: Release of Information to Mass Media](#)



Using Social Media

Be careful when writing anything that might be published online. Keep your electronic communications professional; always assume the whole world can read them. When using social media:

- Be careful when listing MetroHealth as your employer on any social media site, with the understanding that your social media activity may have an impact on MetroHealth.
- Never disclose sensitive, non-public business information about MetroHealth or our business partners, or private medical information about co-workers or our patients.
- Use good judgment, including expressing ideas and opinions in a respectful manner, and never post anything that’s discriminatory or would constitute a threat, intimidation, harassment or bullying.





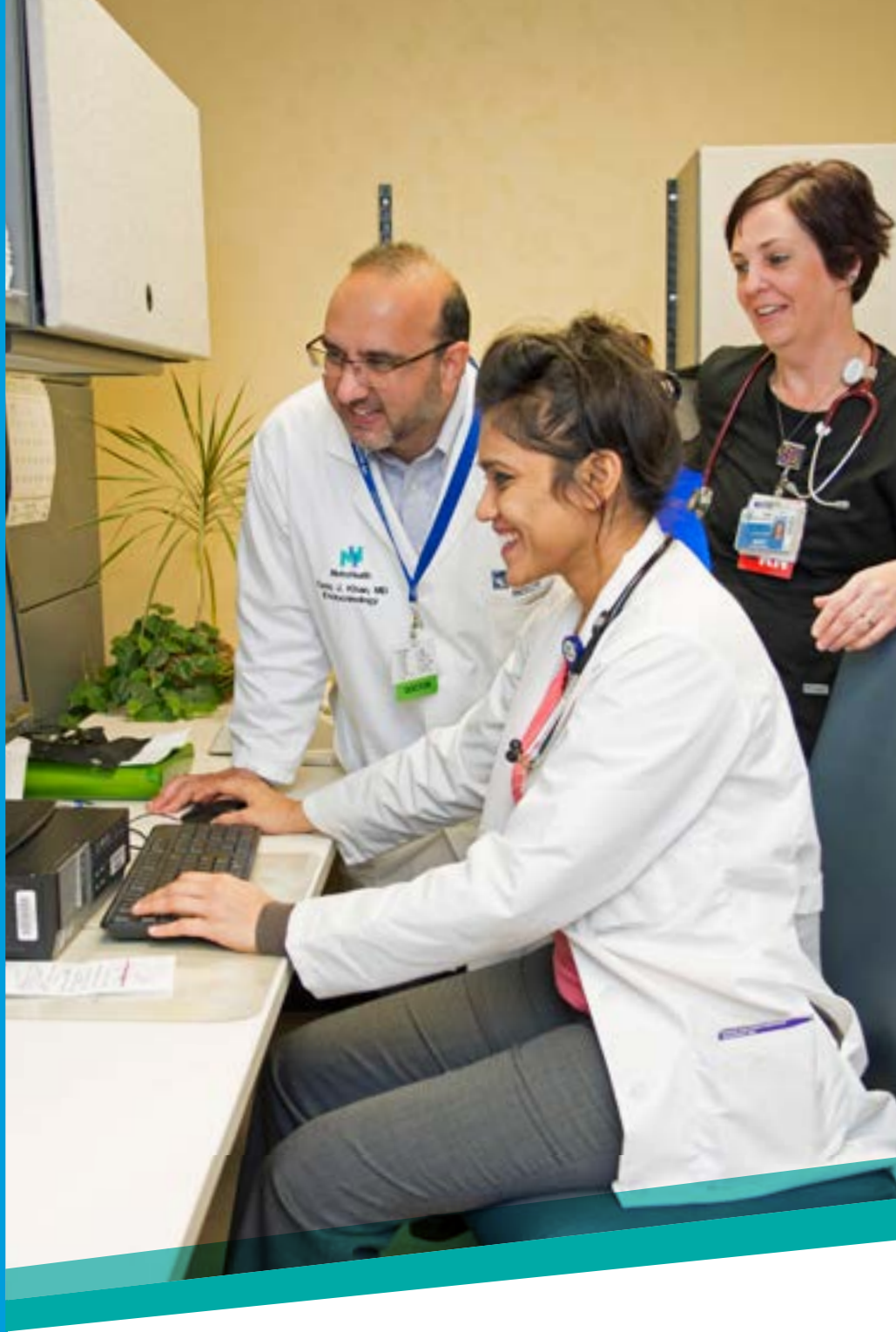
Environmental Sustainability

We are committed to stewardship of the natural environment in our operations and complying with all relevant environmental laws. We work to continuously improve our communities through conserving resources, minimizing waste and taking actions that reduce climate change.

This Is Who We Are

- We recognize our operations affect the health of our co-workers, patients and the public. We are committed to operating our facilities in ways that minimize the impact on the environment, while maintaining a healthy and safe workplace.
- We comply with all applicable laws, policies and regulations aimed at:
 - Protecting the environment,
 - Conserving energy, water and natural resources,
 - Reducing the environmental impact of our operations.
- If we discover an incident or condition that might result in an environmental regulatory violation or adverse environmental impact, we report the situation to our supervisor.
- We are proactive and look for ways to reduce waste and use energy and natural resources more efficiently, minimize negative impacts on the environment and ultimately improve the health of our patients, employees and community.





Collaborating as a Team

“We believe in collaboration – for ours
cannot be a truly great city for health
without all of us working together.”

– From *Our Manifesto*

- Inclusion and Diversity
- Preventing Inappropriate Conduct
- Health and Safety





“When I first came to work at MetroHealth, I was immediately impressed by the commitment to the health and well-being of the community. Everyone in our community matters.”

– CT Technologist

Inclusion and Diversity

We work best when we work together as a team, when we treat each other with respect, and value the unique contributions of others. We always do our part to help create a positive work environment where everyone can contribute and fully utilize their talents.

This Is Who We Are:

- We treat others with respect – our colleagues, our patients and everyone we interact with at work.
- We keep an open mind to new ideas and listen in order to better understand and learn from different points of view.
- We understand that inappropriate or offensive messages, comments and jokes about others’ identities or differences are inconsistent with our team culture and are never acceptable.

When evaluating employees, we use consistent standards and assess their talents, strengths and abilities, and most importantly, their support of our values. We are committed to equal employment opportunity and prohibit discrimination based on protected characteristics, such as age, race, ethnicity, religion, physical or mental disability, sex, sexual orientation, gender identity or expression or any other characteristic protected by law or MetroHealth policy.

We conduct criminal background checks and other required checks, including substance testing, to ensure that individuals we hire are eligible to work for us. We comply with all applicable employment, labor and immigration requirements, and we expect MetroHealth personnel and applicants for employment to cooperate with our compliance efforts.



Every Person Matters

MetroHealth and our patients benefit from the rich variety of ideas, skills and perspectives that emerge when we work together. Our collaboration fuels innovation, better solutions to complex problems and a stronger sense of community. Creating a culture of inclusion and respect enables us to do more than we could possibly accomplish on our own.



Inclusion and Diversity

(Cont.)

Q

A group of colleagues sends emails containing jokes and insulting comments about certain nationalities. They make me uncomfortable, but no one else has spoken up about them. What should I do?

A

You should first ask them to stop. If they won't, or if you are uncomfortable talking directly to them, you can report your concerns to your supervisor or Human Resources. You can also contact MEL. Sending such jokes violates our values as well as our policies. By doing nothing you are condoning behavior that can be seen as discriminatory, and can seriously erode the team environment we have all worked hard to create.



Strengthening Our Values

Our organizational values empower us to challenge the “isms” – (racism, sexism, ageism, ableism and many others). Here are strategies you can use:

- Manage your “blind spots” regarding empathy and tolerance – we all have them and are responsible for managing or eliminating them.
- Stop. Reflect. Choose. – Reflect on what you want to say or actions you want to take. Choose to act in a way that reflects our values.
- When missteps happen – Acknowledge the misstep, apologize, clarify your intent and do better next time.
- Use C.U.S. – C.U.S. is a TeamSteps concept we have all learned for respectful, yet assertive conversations or communications with others. You can say that you are “concerned, uncomfortable or that the situation is a safety/serious/or success issue” that you would like to discuss.

To Learn More

See [HR-29: Equal Employment Opportunity and Compliant Procedure](#)

See [HR-38: Workplace Harassment](#)



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“At MetroHealth there’s simply no room for discrimination or disrespect.”

– Supervisor, Patient Food Services

Preventing Inappropriate Conduct

Inappropriate conduct in the workplace can take many forms and be experienced differently from one individual to another. At MetroHealth, we take seriously any form of harassment or conduct, including demeaning or abusive conduct that is sexual in nature, based on any other protected characteristic, or that constitutes intimidation or bullying.

Any type of inappropriate conduct (physical, verbal, sexual or other) is strictly prohibited and could result in immediate termination of employment.

This Is Who We Are:

- We believe that everyone has the right to work in an environment that is free from harassment, demeaning or abusive conduct.
- We hold ourselves and others accountable to report and address all forms of harassment, inappropriate conduct and bullying.
- We never tolerate degrading jokes, slurs, bigotry, physical or verbal intimidation, unwelcome sexual advances or other offensive conduct when interacting with others.

Q

My supervisor often loses his temper and yells whenever he thinks we’ve done something wrong. Is that harassment?

A

Whether it constitutes harassment or not, the situation creates a poor work environment and violates MetroHealth’s policy and values. This behavior must be addressed because it violates our commitment to maintain a respectful workplace. Talk with your next level supervisor, Human Resources or the Chief Ethics and Compliance Officer.

Q

While attending a conference, a colleague of mine repeatedly asked me out for drinks and made comments about my appearance that made me uncomfortable. I asked him to stop, but he wouldn’t. We weren’t at work and it was ‘after hours’ so I wasn’t sure what I should do. What should I have done?

A

This type of conduct should not occur, not only during working hours but in all work-related situations including business trips. If you are comfortable, you can tell your colleague such actions are inappropriate and must be stopped. If you are not comfortable or the comments continue, you should notify your supervisor, Human Resources or MEL.



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Health and Safety

We understand the importance of providing a healthy and safe workplace for our co-workers, patients, their families, loved ones and others who visit our facilities. Our commitment to health and safety is everyone's responsibility.

Look out for one another and speak up whenever you are concerned or uncertain about potential hazards in our work area. Each of us must provide our constant care and attention to ensure that MetroHealth is a safe place for patients and personnel.

This Is Who We Are:

- We always follow safety and security procedures, and take immediate action whenever we see an unsafe situation.
- We always wear our ID badge, and are alert to those who try to piggy-back into secure areas without showing their ID.
- We help contractors and third parties to act consistently with our safety requirements.
- While at work we are never impaired by alcohol or by illegal drugs.
- We do not use threats, intimidation or violence. These actions undermine everything we stand for as an ethical organization and will not be tolerated.
- We prohibit the possession of firearms, other weapons or explosive devices or dangerous material on MetroHealth premises, except as authorized and permitted by law.

Q I suspect another nurse has been working while under the influence of drugs, and I'm concerned that it's affecting her work and potentially the safety of patients. What should I do?

A Share your concerns with your supervisor. If your suspicions are correct, then this will give us an opportunity to address the issue and connect her with resources that may be able to help.

To Learn More

See [HR-07: Drug-free Workplace and Substance Abuse](#)

See [HR-10: Personal Appearance](#)

*Watch for and report
safety hazards to the
appropriate department.*

These may include:

- Medical waste
- Hazardous chemicals
- Slip and fall hazards
- Damaged or unmaintained equipment
- Electrical hazards
- Unauthorized weapons on premises



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Protecting Our Information and Resources

“We have a responsibility to be honest and transparent about our operations and performance, to use our property with care and to protect confidential and private information.”

– Clinical Engineering Equipment Specialist

- Confidential Business Information
- Use of MetroHealth Resources
- Accurate Recordkeeping





Confidential Business Information

In the course of doing our work, we may have access to confidential information related to MetroHealth strategic or business operations. Because we are a county hospital, we are subject to the Ohio Public Records Act which generally requires us to disclose public records upon request. Yet the Act and other applicable laws provide several exemptions that allow us to protect information from public disclosure, such as trade secrets and patient information. These rules can be complicated. In order to maintain the confidentiality of our trade secrets and information exempt from disclosure under state or federal law, we must protect such information from loss, misuse or inappropriate disclosure. This includes confidential and private information regarding our patients and operations.

This Is Who We Are:

- We always safeguard confidential information, research results and patients’ information that is entrusted to us.
- We properly label confidential information to indicate how it should be handled, distributed and destroyed.
- We keep confidential assets secure to prevent disclosure and we never share research or other intellectual property without proper authorization.
- We follow our computer and network security procedures to prevent unauthorized access; this includes not installing unauthorized software or sharing IDs or passwords.
- If we receive a request for information that’s confidential, we first ensure that it is appropriate to share the information.
- We direct all public records requests to the Legal Department.



Confidential Business Information

Confidential means any information that is proprietary, not publicly known or is subject to restrictions on how it can be shared. Confidential business information includes:

- Passwords and other log-in information
- Patient information (medical and financial)
- Pricing and cost information
- Vendor names, vendor lists and vendor agreement terms
- Intellectual property, including inventions, patents and copyrights
- Data developed or purchased by MetroHealth or entrusted to us by third parties
- Marketing data, business and/or strategic plans

Confidential Business Information (Cont.)

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Cybersecurity

We are all increasingly dependent on networks, databases and the information they contain. Each of us must do our part to protect our electronic data and information systems from accidental and intentional breaches:

- Make sure you follow our policies and practices that are designed to protect our networks, computers, programs and data from attack, damage or unauthorized access.
- Protect your user names and passwords. Never share your password or use the password of another employee.
- Be alert to phishing scams or other attempts to uncover sensitive personal or corporate information.
- Don't open suspicious links in emails, even if you think you know the source.
- Any laptop computer, phone, or other mobile device with patient or other sensitive information should be encrypted and in your control at all times. The loss of any device that contains this information should be reported immediately to the IS Service Desk.
- Report suspicious activity immediately to the IS Service Desk 24/7 or contact the Chief Ethics and Compliance Officer.



Q
A

I just discovered that my laptop is missing. What should I do?

The loss or theft of any MetroHealth mobile device (laptop, iPhone, iPad, encrypted jump drive, etc.) should be reported immediately to the IS Service Desk.

Confidential Business Information (Cont.)

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Q
A

If I am coming right back, do I have to log-out of my workstation?

Yes. Don't leave a workstation with your sign-on credentials still active. Everyone must log off/tap out before leaving a workstation.

Q
A

Can I share information about a new job posting at MetroHealth with a family member?

Although information about employment opportunities is posted publicly and therefore may not be considered confidential information, you cannot use your public position in any way to hire or get someone else to hire your family members.

To Learn More


See [IS-18: Email Usage](#)

See [GEN-02: Public Records](#)

Insider Trading

While at work, you may become aware of material, non-public information about publicly traded companies, including our suppliers and business partners. Using this information for personal gain, sharing it with others or spreading false rumors, is unfair to other investors, and in some instances it may be illegal. Before you use or share this information, discuss the matter with the Legal Department.





“We protect MetroHealth’s resources as if they were our own.”

– Medical Team Assistant

Use of MetroHealth Resources

The public has entrusted us to protect, maintain and use MetroHealth resources to carry out our mission. As public employees, all of us have a responsibility to make sure that MetroHealth resources are used and disposed of appropriately.

This Is Who We Are

- We use MetroHealth property and equipment including all communications systems and electronic media for MetroHealth business.
- As a general rule, we permit the occasional, minimal, reasonable personal use of items such as telephones where the cost to MetroHealth is insignificant and it does not interfere with the performance of duties or the performance of the MetroHealth systems.
- MetroHealth resources may not be used for community, charitable or non-MHS use without approval from your supervisor.
- We follow proper procedures for disposal of MetroHealth equipment and property.

MetroHealth resources include employee time, supplies, equipment, facilities, information, software and data as well as intellectual property.







Accurate Recordkeeping

We are committed to presenting an honest and transparent view of all our business records and reports. This includes financial transactions, financial reports, personnel records, insurance claims and medical records.

Having complete and timely records inspires trust in our colleagues, patients and business partners and demonstrates integrity to all our stakeholders. Accurate and accessible information is essential within MetroHealth so that we can make informed business and clinical decisions.

Each of us impacts MetroHealth business records, regardless of where we work, so accuracy is critical. We never falsify or alter any business document, employment or medical record. We record all transactions properly, and never delay or accelerate reporting of financial information. In our documentation, we ensure the information we report is clear, complete, accurate and timely. Keep in mind that our records (with certain exceptions) are subject to the Open Records laws.



Record Management

MetroHealth has records management policies and procedures to ensure that our records are maintained, stored and destroyed in compliance with federal and state laws.

We are familiar with the recordkeeping procedures that apply to our jobs and we are accountable for the accuracy and truthfulness of the records we produce. It is also our responsibility to keep our records organized so they can be located and retrieved when needed.

Documents should only be destroyed in accordance with our records retention policy. Records may not be removed or destroyed prior to the specified date without first obtaining permission as outlined in the records management policy. For questions on record management, please contact the Legal Department.

Accurate Recordkeeping (Cont.)

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This Is Who We Are:

- We follow applicable laws and our policies when creating, retaining or destroying MetroHealth records.
- We are always clear, concise, truthful and accurate when recording any information. In patient records, we avoid exaggeration, colorful language, guesswork, legal conclusions and derogatory characterizations of people and their motives.
- We always remain alert for possible false entries, misleading or inappropriate statements or omissions from our records.
- We keep records organized for easy location and retrieval, when needed.
- We report suspected improprieties in accounting, billing and coding, patient records, employee timekeeping, financial reporting or other recordkeeping matters.

Q

Before we move to our new office, we are sorting through paper documents from the filing cabinets. Is it okay to put old business documents or medical records in the shred bin?

A

Stop. Before removing documents or medical records, first review our record retention policy, then contact the Legal Department (regarding non-PHI information) or the Chief Ethics and Compliance Officer (regarding PHI) for further assistance in determining proper retention and destruction requirements.

To Learn More

See [PR-04: Retention and Disposal of Information](#)





Maintaining a Culture of Ethics and Compliance

“As health care professionals and public employees, we need to be above reproach and always accountable for our actions.”

— Coding Specialist


- Meeting Federal Health Care Program Requirements
- Conflicts of Interest
- Gifts, Entertainment and Business Courtesies
- Relationships with Physicians and Other Third Parties
- Fair Competition
- Marketing and Advertising
- Government Interactions and Inquiries



Meeting Federal Health Care Program Requirements

We operate in a highly regulated industry subject to extensive and complex federal and state standards. As MetroHealth employees, we are expected to know the rules that apply to our individual jobs and comply with all regulatory standards that apply to our business. Doing so ensures that claims submitted to the government, third-party payors and patients are accurate and meet all federal health care program requirements. Patients place their trust in us. We must each do our part to ensure claims are accurate and prevent and detect fraud, waste and abuse.

Legal and regulatory compliance can be complicated, especially when insurance claims and programs like Medicare are involved. Whenever questions about laws or compliance arise, we must seek help. If you have questions or suspect improper billing, contact your supervisor or the Ethics and Compliance Department.



Key Definitions

Fraud is the intentional deception or misrepresentation made with the knowledge that the deception could result in some unauthorized benefit. Fraud examples include billing for services never rendered or altering a diagnosis to receive payment.

Waste is related primarily to mismanagement, inappropriate actions and inadequate oversight leading to the misuse of resources. Waste would include ordering excessive diagnostic tests (e.g., pregnancy tests on all patients regardless of gender/age, daily complete blood counts on all inpatients) or prescribing 90 days of medication when only 7 days is needed.

Abuse relates to practices that are inconsistent with sound fiscal, business or medical practices and which result in unnecessary costs. Abuse examples include charging excessively for services or supplies or providing treatment to a patient that is inconsistent with the diagnosis.



Meeting Federal Health Care Program Requirements (Cont.)

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This Is Who We Are:

- We comply with all federal health care program requirements including billing laws and regulations, and address inquiries quickly and honestly.
- We only bill for medically necessary services actually provided and assign codes that accurately reflect documentation in the medical record.
- We ensure there is appropriate documentation for all financial reports, claims submitted to payors and all external agencies.
- We respond promptly to any patient complaint or question regarding a bill.
- We monitor and audit MetroHealth billing practices and correct billing errors prior to submitting a bill. If the bill has already been submitted, we correct the underlying problem and make appropriate refunds.
- We never engage in unlawful or inappropriate practices that could result in a false claim being made. This may include misrepresenting a diagnosis to obtain payment or unbundling charges to enhance payment.

Q

A co-worker received a call from a patient stating that his insurance company will not pay for certain radiology services based on the diagnosis code on the claim. The patient asked her to change the diagnosis code to a code that would be paid by the insurance company. She agreed to change the code. Should I say something about this?

A

Yes. Let your co-worker know that these types of requests should be routed to Patient Financial Services for review. No one should ever change a diagnosis code or any other documentation based on what insurance will or will not pay.

To Learn More

See [**EC-15: Detection and Prevention of Fraud, Waste and Abuse and Applicable Federal and State Laws**](#)





Conflicts of Interest

As MetroHealth employees and stewards of public resources, it’s important that we are free of undue outside influences. We exercise the utmost good faith in all transactions related to our duties for MetroHealth. We disclose any potential and actual conflicts of interest in a timely manner, both annually and as they occur throughout the year.

Being able to recognize a potential conflict can help you avoid one. While it isn’t possible to list every situation that could present a conflict, the following practices will help recognize and mitigate potential conflicts of interest.

This Is Who We Are:

- We disclose and seek approval of any outside financial interest that might appear to influence our decisions or actions, such as:
 - A personal or family interest in a business that has a business relationship with MetroHealth,
 - An investment in another business that competes with MetroHealth.
- We seek approval before joining the board of directors of another organization or participating on a government committee or commission.
- We seek approval for any outside employment and we never allow an outside job to interfere with our duties at MetroHealth.
- We do not use our position, or knowledge gained in our position, for personal benefit – apart from our normal compensation.



Hiring Former and Current Government Employees

The Ohio Ethics law contains restrictions for the recruitment and employment of former or current public (state or federal) employees. In addition, if any employee leaves MetroHealth to go work for a company that is a vendor of MetroHealth, there are certain restrictions and requirements that must be followed. Employees should consult with the Ethics and Compliance Department or the Legal Department regarding such issues.

A conflict of interest can occur when outside interests interfere with our ability to perform our duties objectively on behalf of MetroHealth.



Conflicts of Interest (Cont.)

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Q

I'd like to accept a part-time job on the weekends. It has nothing to do with my work at MetroHealth, and it would only be for a few months. Is that a conflict?

A

Probably not. It depends on factors like the type of job you have at MetroHealth, the nature of the part-time job and the hours you'll be required to work. But you'll need to talk to your supervisor and complete the appropriate secondary employment form before accepting to make sure there is no conflict.

Q

I am a nurse. My sister owns a business that provides home health services. Is it okay if I tell my patients about these services?

A

No. Promoting a family business to our patients is a conflict of interest and is not permitted. You should report the conflict so your situation can be fully reviewed.

Managing Conflicts

In many instances conflicts can be avoided or managed if certain steps are followed. Be proactive and, whenever possible, avoid situations that can lead to even the appearance of a conflict. If you find yourself in a potential conflict of interest, talk with the Chief Ethics and Compliance Officer. Depending on the circumstances, some conflicts may be resolved if they are proactively disclosed and handled properly.

To Learn More

See [EC-08: Conflicts of Interest](#)



Gifts, Entertainment and Business Courtesies

An occasional gift, entertainment or business courtesy is often viewed as a normal part of doing business, but sometimes even well-intentioned gifts or entertainment can cross the line or even be illegal.

The rules governing gifts and entertainment can be complicated, especially since we are public employees and must follow the Ohio Ethics law. Except as noted below, gifts, entertainment and business meals may not exceed \$75 per year from a vendor or prospective vendor. If you have any questions, discuss the matter with your supervisor or the Chief Ethics and Compliance Officer.

This Is Who We Are:

When exchanging gifts and business courtesies, the following guidelines must always be met:

- It must be consistent with our policies, all applicable laws and regulations, and with the policies of the recipient’s organization.
- It must not appear to influence or give the appearance of influencing the judgment of the recipient.
- It must not bring into question MetroHealth’s motives, business integrity, appropriate business practices, or reputation.



Prohibited Gifts – We do not accept cash or cash equivalents, including gift cards or certificates for specific stores. We do not solicit gifts.

Gifts during the Bidding Process – We do not accept gifts, entertainment or business courtesies from a current or prospective vendor during the bidding process. If a vendor offers a gift, entertainment or business courtesy, please decline it and contact your Supply Chain representative.

Gifts from Patients – Patients who want to make a monetary gift to MetroHealth, regardless of the value, should be referred to the MetroHealth Foundation. If a patient insists on making a personal gift, we may only accept consumable or perishable gifts that can be shared with co-workers (e.g., flowers or a box of candy).

Gifts, Entertainment and Business Courtesies (Cont.)



Gifts and Entertainment – Government Representatives

Extra care needs to be taken when dealing with government officials. No gifts or other benefits, including entertainment, can be accepted or offered to government officials. There are very limited exceptions to this rule, but in these rare cases you need to receive approval in advance from Government Relations, the Chief Ethics and Compliance Officer or the Legal Department.



Q
A

A vendor has offered to pay for me to travel to a customer showcase to evaluate one of their new products. May I accept?

It depends. Accepting travel or payment to evaluate a product is not permitted unless the travel is explicitly part of a contract with the vendor. Please contact the Legal Department with specific contract questions.

To Learn More

See [EC-09: Business Courtesies from Vendors and Patients](#)

See [EC-10: Vendor Relations](#)

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Relationships with Physicians and Other Third Parties

Physicians and other health care providers are often in a position to refer patients to our facilities. Federal and state laws have specific requirements that we must follow to ensure referrals are proper, based on the needs of the patient and not in return for gifts or special favors. With this in mind, we prohibit paying for referrals or accepting anything of value in exchange for the referrals of patients.

This Is Who We Are

- We are honest and ethical in our interactions with physicians and other referral sources.
- We accept referrals based only on:
 - A patient’s unique medical needs
 - Our capability to provide needed services
 - Availability of our resources
 - Need for collaborative care
- We never offer to pay anyone, including co-workers, physicians or any other health care provider to refer a patient.
- If we are offered any kind of payment for a patient referral, we turn it down and report it to the Ethics and Compliance Department.

To Learn More

See [EC-14: Federal Anti-Kickback Statute and Stark Law](#)



Kickbacks and Inducements

The Federal Anti-Kickback Statute and various similar state laws prohibit giving, getting, offering or asking for anything of value in return for patient referrals. Be especially careful and consult the Legal Department regarding all relationships and arrangements with referral sources, physicians and vendors to be certain there are no kickbacks or illegal inducements for the referral of patients.



The following activities are examples of “red flags” that should be avoided and reported to the Legal Department:

- Agreements with competitors to fix fees and prices or attempt to rig the bidding process
- Exchanging sensitive information with competitors
- Imposing restrictions on vendors and suppliers

Fair Competition

Competition or antitrust laws are intended to ensure that competition is open and fair and in the best interest of the public. These laws are complex; compliance requirements can vary depending on the circumstance.

If you have any questions, you should discuss the matter in advance with the Legal Department.

This Is Who We Are

- We understand how antitrust laws apply to us and to our work at MetroHealth, and if we are unsure we seek advice from the Legal Department before taking any action that could possibly be a violation.
- We use good judgment when meeting with competitors.
- We gather information about competitors fairly; we never use improper methods such as spying or hacking.
- We never encourage third parties or former employees of competitors to provide us with confidential information.

Q

A competitor accidentally emailed their new strategic plan to me. What should I do?

A

Although you received the information by accident, it is not ethical to take advantage of another’s mistake. MetroHealth competes fairly and does not gather competitive information except through acceptable channels. Contact the Legal Department and delete the email.

Q

I will be attending a trade association meeting and I’m worried that my discussions may violate antitrust laws. I’m not sure what I can and cannot discuss. What should I do?

A

You are right to be concerned, but the situation can be managed. Trade association meetings are an excellent way to stay informed and connected, but since they bring together competitors they can lead to antitrust violations. Before the meeting, discuss your concerns with the Legal Department. When you are at the meeting and a discussion begins that may be improper, state that you believe the discussion is inappropriate, break away from the discussion and promptly inform the Legal Department.

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Marketing and Advertising

To best serve our patients and the public, it is important that we keep them informed about MetroHealth, our services and initiatives that impact the community.

Those who work directly with our marketing and advertising initiatives, including employees in marketing and business development, must be aware of policies and relevant laws and regulations, but all of us can play a role in making sure that the information we share with the public on behalf of MetroHealth is honest and accurate.

This Is Who We Are

- We use marketing, advertising and public relations activities, including social media, to educate the public, provide information to the community, increase awareness of our services and recruit new employees.
- We strive to present only truthful, fully informative and non-deceptive information in MetroHealth materials and announcements.
- Our messaging is always professional and consistent with our stance on inclusion and diversity.
- We follow our brand standards and only use approved marketing materials provided by our Marketing and Communications team.

To Learn More

See [Marketing and Communications](#)





Government Interactions and Inquiries

We are aware of the unique requirements of government programs. We comply with these requirements and are always honest, cooperative and courteous in our interactions with government representatives.

We cooperate with every reasonable request of federal, state and local authorities seeking information concerning our operations.

This Is Who We Are

- We comply fully with all applicable laws and regulations that apply to government contracting and transactions.
- We screen all new hires, medical staff business partners, suppliers and vendors against government exclusion lists.
- We never offer or provide gifts to a government official or their staff and we report any request from a government official for a gift or improper payment.
- If we receive an inquiry or a visit from regulators or government authorities we notify the Legal Department before answering any questions or providing information.

To Learn More

See [EC-06: Federal and State Exclusion Lists](#)

See [PR-19: Subpoenas and Court Orders](#)



Ineligible Persons

We do not contract with, employ or bill for services provided by an individual or entity that is excluded from or ineligible to participate in state or federal health care programs; are suspended or debarred from federal government contracts or has not been reinstated in a federal health care program after a period of exclusion, suspension, debarment or ineligibility.

We routinely search the Ohio Department of Medicaid Provider Exclusion and Suspension List and the Health and Human Services’ Office of Inspector General and General Services Administration’s lists of excluded and ineligible persons.



Our Ethics and Compliance Program

MetroHealth created the Ethics and Compliance Program to reinforce our commitment to conducting business with integrity. This Code is the foundation of our Ethics and Compliance Program, and describes our standards of ethical business conduct.

The goals of the Ethics and Compliance Program include:

- Establish and communicate standards of ethics in business practices.
- Provide training about standards of ethics, applicable policies and laws.
- Measure and assess compliance with legal standards and policies through monitoring and auditing.
- Detect deficiencies and assess regulatory-related risks.
- Create procedures to prevent, detect and correct breaches of laws, policies and procedures.
- Promote a culture of ethics and compliance.

To Learn More

See [EC-01: Ethics and Compliance Program](#)

Our Ethics and Compliance Program (Cont.)

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Elements of MetroHealth's Ethics and Compliance Program

MetroHealth is committed to maintaining a culture that promotes the prevention, detection and resolution of conduct that does not conform to laws, regulations, our policies and this Code. The actions of each one of our employees are critical to upholding this commitment.

- **Oversight** – the Audit and Compliance Committee of the Board of Trustees provides high-level oversight to the Ethics and Compliance Department to ensure that MetroHealth maintains an effective compliance program.
- **Policies and Procedures** – policies are developed at departmental or system levels. MetroHealth system-level Ethics and Compliance policies can be found on the MIV under The MetroHealth System Policies. The **Code of Conduct** – *This Is Who We Are – Our Culture of Ethics and Compliance* serves as the foundation of our Ethics and Compliance Program and provides guidance about legal and ethical business behavior.
- **Training and Education** – MetroHealth provides training on the Code and on compliance issues and policies.
- **Monitoring and Auditing** – With the assistance of internal auditors and external consultants, the Ethics and Compliance Department oversees and conducts compliance audits, with special attention given to billing, coding, pharmacy, research, physician relations and other high-risk areas.
- **Internal Reporting Process** – MetroHealth maintains a system to enable employees and others to ask ethics and compliance-related questions and to report potential wrongdoing without fear of retaliation.
- **Responding to Detected Deficiencies** – MetroHealth, through the Ethics and Compliance Department, responds to detected deficiencies in operations that create risk to the organization. We implement corrective action to prevent or mitigate the risk.
- **Enforcement of Standards** – MetroHealth disciplines employees for violations of laws, regulations, this Code, policies and procedures.



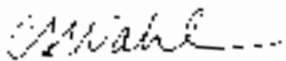


Closing Thoughts

Thank you for reading our Code, *This Is Who We Are – Our Culture of Ethics and Compliance*. Hopefully, it is a useful resource for you to use when you have questions or are faced with difficult ethics and compliance decisions.

You represent MetroHealth to our community and our patients. They place their trust and their lives in our hands every day. We repay that trust with our continued commitment to the highest quality care and dedication to excellence.

Always remember that we are a team and the resources mentioned throughout this Code are available to help. If you have any questions about a specific topic or suggestions about how we can improve our ethics and compliance initiatives, please do not hesitate to contact me.



Cheryl Forino Wahl, JD
Senior Vice President/Chief Ethics and Compliance Officer

MetroHealth supports employees’ right to speak out about matters of public concern or engage in certain activities related to the terms and conditions of their employment. Nothing in this Code or in any of our policies is intended to limit or interfere with the right to engage in activities protected under relevant labor law, such as discussions related to wages, hours, working conditions, health hazards and safety issues.



Additional Resources

Resource:	For help with:	Contact:
MetroHealth Ethics Line ("MEL")	Concerns, questions or reports about suspected violations of the Code, law or our policies.	You can call MEL 24 hours a day, 7 days a week at 216-778-1660. You can also file a complaint or submit an inquiry electronically by going to www.metrohealth.org/compliance .
Ethics and Compliance Department	Concerns, questions or reports about suspected violations of the Code, law or our policies.	compliance@metrohealth.org
Human Resources Department	Concerns, questions or reports about HR issues.	laborrelations@metrohealth.org
Government Relations	Questions or concerns about political activity or any state, federal or local legislation that affects MetroHealth.	govrelations@metrohealth.org
Legal Department	Concerns or questions about suspected violations of the law, interpretations of law or for communications under the attorney-client privilege.	legal@metrohealth.org



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