

**HOPE.
HEALTH.
HUMANITY.**



**THIS IS
WHO
WE ARE**

**OUR CULTURE
OF ETHICS**



THIS IS WHO WE ARE.

TAKE ME TO THIS SECTION 



WE ARE LEADERS.

TAKE ME TO THIS SECTION 

WE ARE COLLEAGUES.

TAKE ME TO THIS SECTION 

WE ARE CAREGIVERS.

TAKE ME TO THIS SECTION 



WE ARE COMMUNITY MEMBERS.

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TAKE ME TO THIS SECTION 

  
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This Is Who We Are: Our Culture of Ethics (Code)

The Code, the foundation of our culture, represents who we are, what we stand for, and how we conduct ourselves. Read the letters from MetroHealth leaders as they introduce our Code and they acknowledge our collective commitment to our culture of ethics.

A Message from Dr. Airica Steed

Dr. Steed inspires us all to commit to the guiding principles of our Code, to build trust with each other, and our community.

[READ THE LETTER](#) 

Letter from Board Chair, E. Harry Walker, MD

Board Chair E. Harry Walker, MD and the Board of Trustees commend the work that we do to ensure our culture of ethics flourishes.

[READ THE LETTER](#) 

Our Manifesto

Together, we are more than medicine.

[READ OUR MANIFESTO](#) 

Our Mission, Vision, and Values

We, as employees, colleagues, and community members, inspire the MetroHealth Mission, Vision, and Values.

[READ OUR MISSION, VISION, AND VALUES](#) 

Devoted to Hope, Health, and Humanity.

Review the principles of our Culture of Ethics.

[READ THE PRINCIPLES OF OUR CODE](#) 

WHO WE ARE.



A Message from Dr. Airica Steed

“This is Who We Are: Our Culture of Ethics” is a guide for all of us, no matter who we are or what we do at MetroHealth. Our employees embrace and live the principles outlined in the Code daily. Their dedication to our Code is what makes MetroHealth a great place to work.

For me, the Code takes on special meaning. I chose to focus on Ethical Leadership as I worked toward a doctorate of education for one simple reason: We must always do the right thing, especially in health care, where people’s lives depend on us.

Preserving and expanding that trust is why we have built a culture of integrity and accountability at MetroHealth. It is also why each of us must speak up when we see or hear anything that violates this Code.

If you have any concerns at all, please talk to your supervisor or any member of our leadership team or use any one of the other resources in this book. We will deal with all issues that are brought to our attention. Our non-retaliation policy ensures that you will be protected.

One of the many reasons MetroHealth has gained this community’s respect is because of you and your commitment to our mission and values. Abiding by this Code is how we maintain that respect. And it is how MetroHealth continues to make life better for every person we serve.

Best,

Airica Steed, Ed.D, RN, MBA, FACHE
President & CEO

WHO WE ARE.



A Letter from Board Chair E. Harry Walker, MD

Caring for our community is an enormous responsibility. For almost 200 years, members of our community have entrusted us with their health and the health of those they love. Ethical conduct anchors and preserves that trust, which is why this Code is vital to everything we do at MetroHealth.

I, along with every member of the Board of Trustees, am proud to support MetroHealth's Ethics and Compliance Program, which is designed to uphold our culture of accountability and integrity.

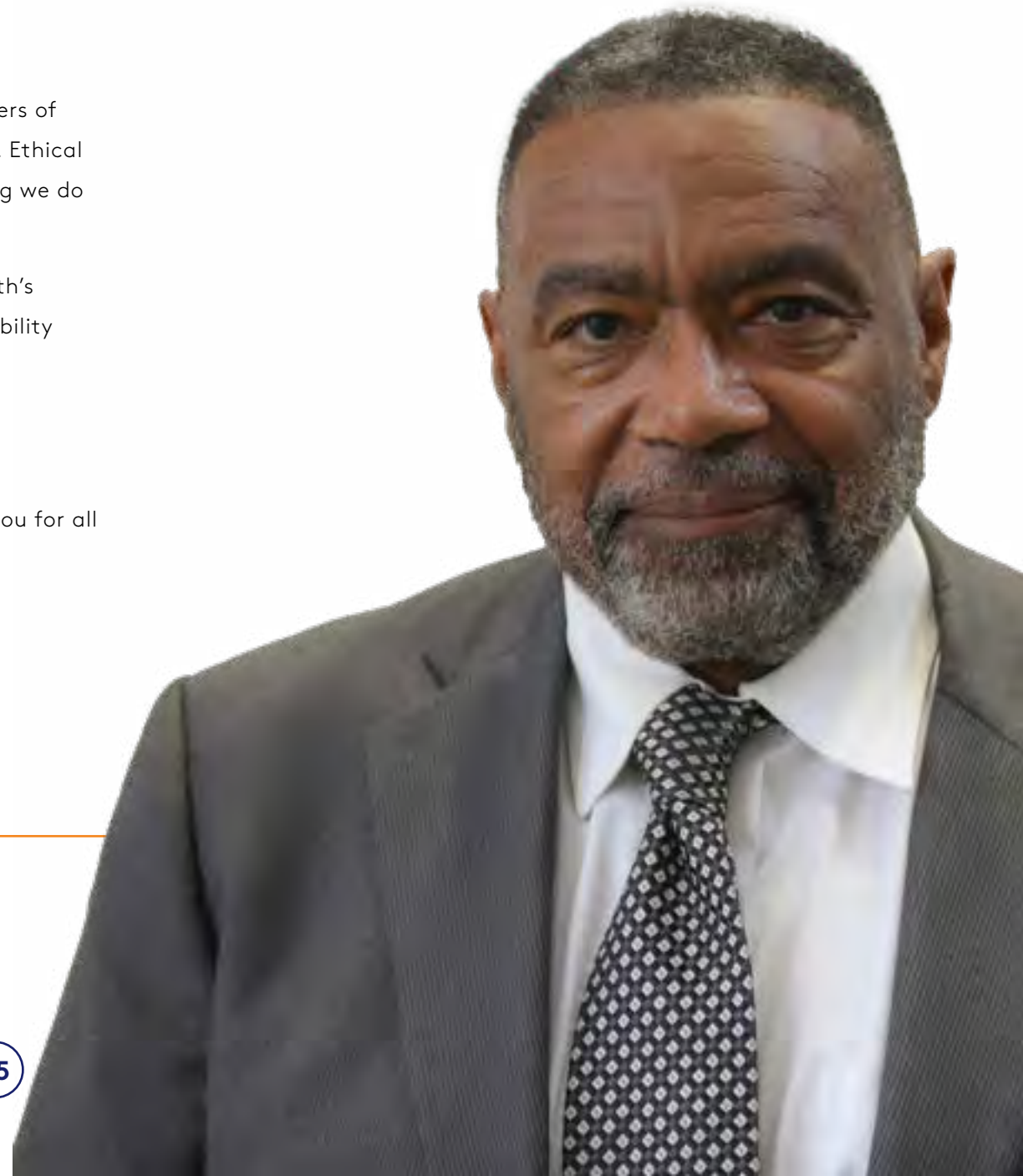
Living our values is how we will succeed in our goal of building a healthier – and more equitable – community.

This work would not be possible without the dedication of caregivers like you. Thank you for all you do for our community, the individuals we serve and each other.

Sincerely,

E. Harry Walker, MD
Chair, Board of Trustees

WHO WE ARE.



Our Manifesto

Together, we are more than medicine.

We are the guardians of those who need care the most.

We deliver state-of-the-art care through deliberate focus on every person's needs.

While our goals are audacious, we are relentless in our pursuit of health for every person. In our fight for equity, inclusion, and diversity, we are inspired to eliminate barriers that impact health.

Because we are intentional about serving our community, we walk alongside every person at every step of their journey to health. That's a promise that extends beyond our hospital walls.

We are devoted to hope, health, and humanity.

We are more than medicine. We are hope.

We are MetroHealth.

WHO WE ARE.

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

Services 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.



WHO WE ARE.

Principles of Our Code

Upholding the Law

1. We are public employees and follow the highest standards of ethics and compliance in everything we do.
2. We protect privacy and only access, use, or disclose confidential information (including patient information) for appropriate business reasons.
3. We speak up when we suspect violations of laws, policies and procedures and ask questions about doing the right thing.
4. We support those who raise concerns and never tolerate retaliation.
5. We identify and report conflicts of interest — avoid them when we can and manage them when they are unavoidable.

Devoted to Hope, Health, and Humanity.

1. We stay true to who we are: our Mission, Vision, and Values.
2. We deliver high-quality care to every patient wherever they are on their personal wellness journey.
3. We treat everyone fairly and honestly: our patients, colleagues, business partners, and suppliers/vendors.
4. We promote a psychologically safe environment where everyone's contribution is valued and respected.
5. We work to achieve health equity for our patients, and equity, inclusion, and diversity for our employees and community.



WHO WE ARE.



Our Responsibilities as Leaders

At MetroHealth, regardless of our title or position, we are all leaders by taking personal responsibility and setting a positive example for others. This includes acting with integrity when making decisions on behalf of MetroHealth and speaking up when we have concerns.

Our Culture of Ethics →

Making Good Decisions →

Reporting Concerns →

Our Responsibilities as Colleagues →

WE ARE LEADERS.



Our Culture of Ethics

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 value diversity and inclusivity. We fight for equity in all situations. We meet our patients where they are in their health journey. We see the whole person, not just the situation, 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 colleagues, and our community.

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

Maintaining a culture of ethics is not always easy. Which is why we've developed *This Is Who We Are: Our Culture of Ethics*. The Code 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 are done.



WE ARE LEADERS.

Using the Code

Our Code is a guide for making the right decision. Throughout these pages, we include links to MetroHealth policies and resources. We reference others who can guide you when the right decision is not as clear. If you do not find the answers you're looking for in the Code, you may always contact Ethics and Compliance.

Ethics and Compliance periodically reviews and updates the Code and submits proposed updates to the MetroHealth System Board of Trustees for review.

To Learn More See:

EC-02: CODE OF CONDUCT AND CERTIFICATION



Contact Ethics and Compliance:
Compliance@metrohealth.org

Accountability

We follow the Code and our standards, laws, or regulations because failure to do so can lead to loss of trust from our colleagues, our patients, and the community. Additionally, we may face consequences, both individually and for MetroHealth.

Who must follow the Code?

Each of us, regardless of our position at MetroHealth, follows the Code. These principles should be at the core of every decision made. Everyone at MetroHealth, including the MetroHealth System Board of Trustees, all affiliate Boards, and all employees live these values every day.

Anyone acting on our behalf conducts themselves in a manner consistent with our Code and applicable policies. This includes volunteers, visiting or contract healthcare providers, researchers, business partners, suppliers/vendors, and consultants.

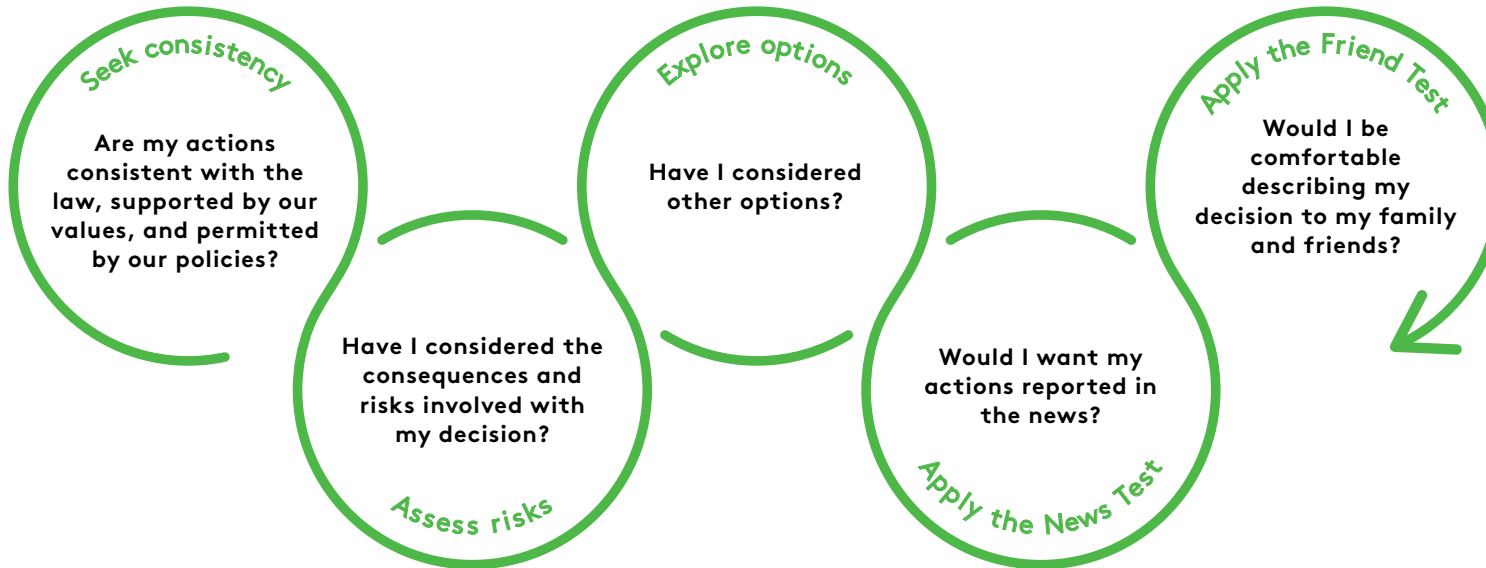
Throughout the Code, we use the term "standards" to mean MetroHealth policies and procedures and state and federal regulations, rules, and laws.

WE ARE LEADERS.


Making Good Decisions

At MetroHealth, our reputation for acting ethically and responsibly is built one decision at a time every day by each of us. Our Code, along with our standards, gives us the information we need to make decisions rooted in good judgement. These decisions lead to behaviors that are legal, ethical, and responsible. If something doesn't feel right, then it might not be.

When faced with a difficult decision, we ask ourselves these five questions:



"We do what is right, including speaking up when something is wrong."
- Manager, Coding Services

If the answer to any of these questions is **"No,"** or if you're not sure, **stop and ask for help.** See the Reporting Guide ( Resources) for resources to assist in your decision-making.

WE ARE LEADERS.



Urgent Patient Safety Matters

Involvement or awareness of a serious patient safety event requires prompt contact of your immediate supervisor. If the event involves imminent harm, and your immediate supervisor is not available, contact the Administrator on Call.

Reporting Concerns

Speaking up takes courage. When we report concerns in good faith, we protect ourselves, our colleagues, our patients, and MetroHealth. If you see or suspect a situation that violates our Code or standards, please report it. MetroHealth takes all reported concerns seriously.

As public employees, we are also accountable for our actions. This means, we must report concerns in good faith. We do not tolerate deliberate false accusations by employees. If we determine that a report is made with malicious intent, or is knowingly false, the person reporting the false information may be subject to disciplinary action up to and including termination of employment.

Non-Retaliation

MetroHealth supports employees who report suspected wrongdoing in good faith. 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.

There are many ways to share your concerns. In most cases, supervisors should be the first point of contact. They are likely in the best position to understand the concern or question and take the appropriate action.

However, if they are unable to answer your question, here are some other options:

- Discuss the issue with any member of management.
- Talk to Human Resources, Ethics and Compliance, or Legal.

If you want to report a concern anonymously:

- Contact the MetroHealth Ethics Line (MEL)
 - » Phone: 216-778-1660
 - » Text: 216-600-1456
 - » Web: WWW.METROHEALTH.ORG/COMPLIANCE

To Learn More See:

HR-80: NON-RETALIATION POLICY



MEL

MEL, accessible 24 hours a day, 7 days a week, with translation services available, provides a confidential way to ask questions and report concerns.

You can file a report or question on the web, through text, or by phone. When you call MEL, independent, third-party specialists record details about the concern and provide a summary report which gets routed to the appropriate department - Human Resources, Ethics and Compliance, or Legal.

When reporting an issue, provide as many details (who, what, when, where) as possible, especially when reporting anonymously.

For more information on using MEL, (including how to report anonymously), see the *SPEAK UP. LISTEN UP. FOLLOW UP. TOOLKIT.*

WE ARE LEADERS.

Q I reported a concern to MEL a few weeks ago. Was it investigated? Is an outcome provided?

A Ethics and Compliance ensures every reported concern is investigated. We encourage every reporter to follow up on their concern through the MEL system. This is the only way the investigator can engage with anonymous reporters.

Also, while you may be provided the outcome of an investigation, substantiated or not, any corrective action that may result from a report is confidential. Corrective action, ranging from training/coaching to other employment consequences, including termination, is evaluated on a case-by-case basis.

Q I made a report about my colleague, and I think they found out. They are being disrespectful and not including me in events or conversations. Can I be retaliated against by my peer? What can I do?

A Yes, retaliation can occur at all levels of an organization and from all directions (for example, manager to employee, employee to employee, employee to manager, etc.). Regardless of who is retaliating, MetroHealth supports and investigates employees who report allegations of retaliation. Report your concern through any reporting channel.

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

Contact Biomedical Ethics:
BioEthics@metrohealth.org

WE ARE LEADERS.



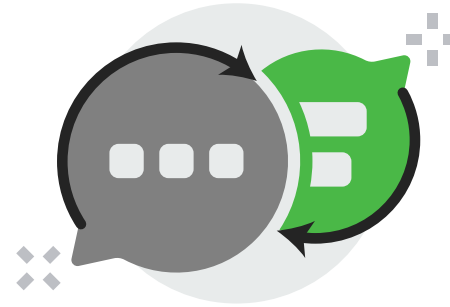
Investigations and Confidentiality

Any information provided through MEL or other reporting channels is confidential to the extent permitted by law or as the investigation allows.

MetroHealth may be required by law to report certain types of activities. In such cases, employees may be subject to civil and/or criminal penalties imposed by a governmental agency or a court.



We act objectively when evaluating information gathered through interviews or document reviews.



We contact employees who may have information about the alleged incident(s).



When appropriate, HR takes corrective actions, including disciplinary measures.

To Learn More See:

[EC-04: REPORTING CONCERNS](#)



[HR-36: CORRECTIVE ACTION](#)



WE ARE LEADERS.

Our Responsibilities as Colleagues

We all have a role in helping MetroHealth's culture flourish. Our Code and standards give us the information we need to perform our jobs ethically.

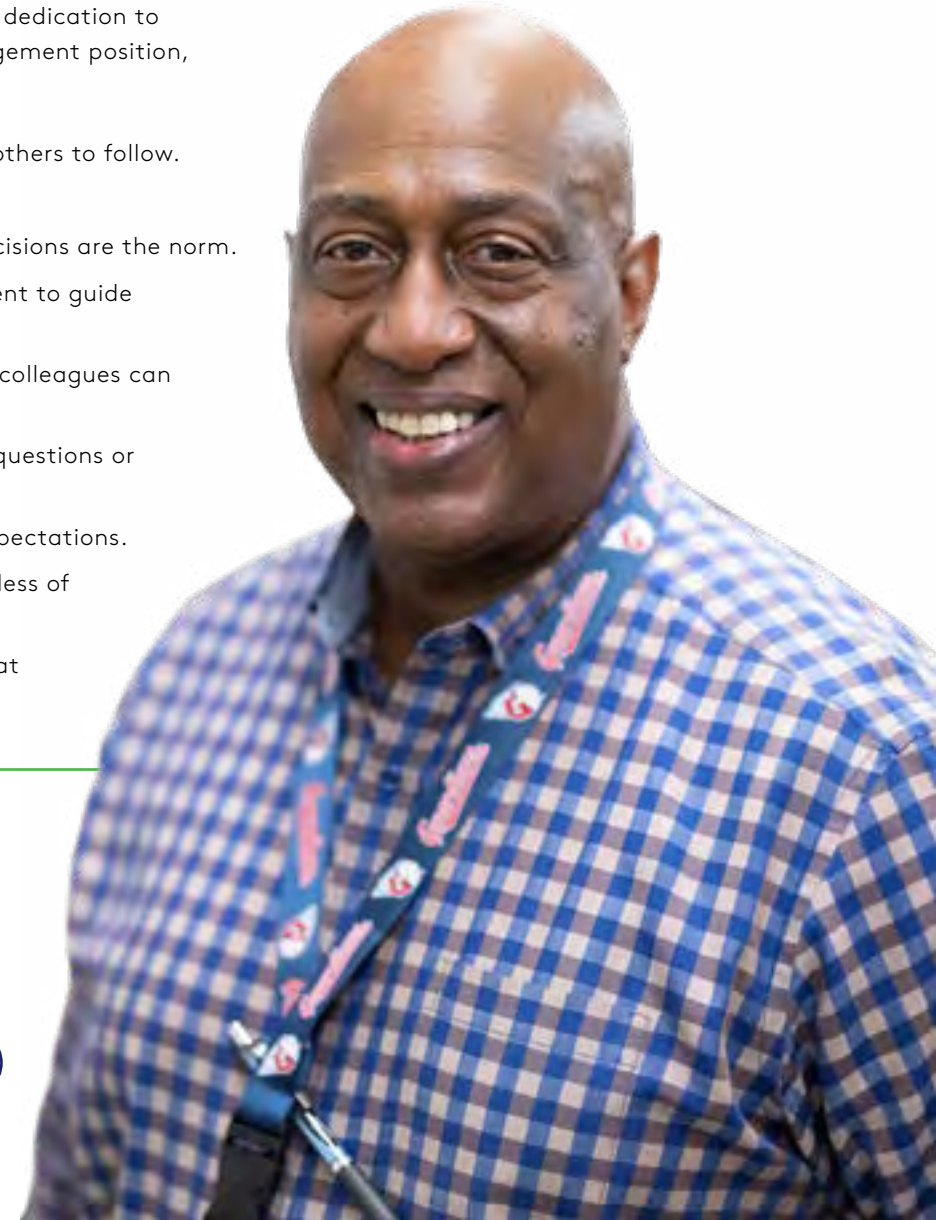
This Is Who We Are:

- We live our values.
- We use good judgment and act with integrity and honesty.
- We speak up when we see or suspect misconduct or unethical behavior.
- We follow the information contained in this Code and our standards.
- We represent the MetroHealth brand to our patients and the public.

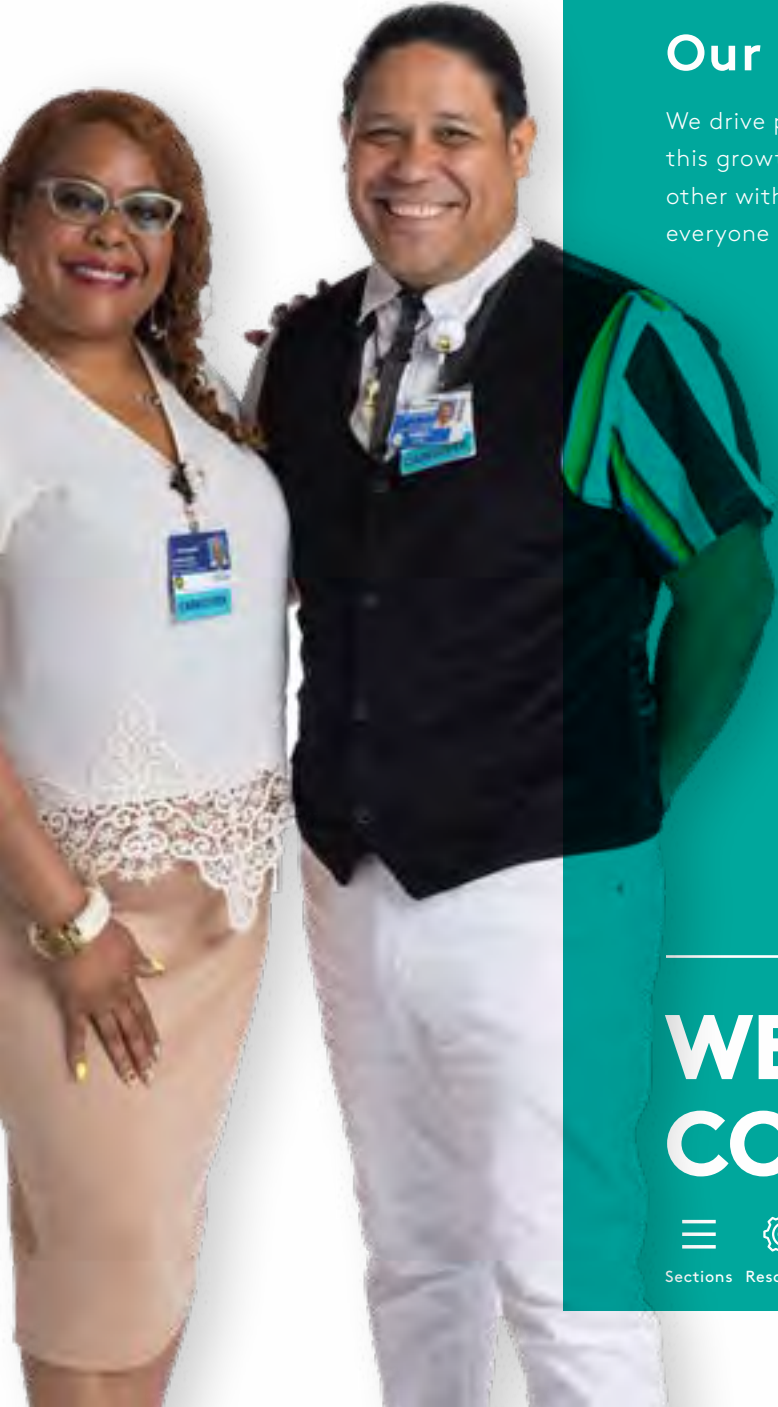
MetroHealth Leaders Have Additional Responsibilities

As leaders, it's our responsibility to create an experience among our teams that leads to a lasting emotional connection to MetroHealth and a dedication to serving our patients and community. When serving in a management position, we have additional responsibilities:

- We serve as positive role models and set examples for others to follow.
- We recognize colleagues when they live our values.
- We foster positive work environments where ethical decisions are the norm.
- We provide our colleagues with training and development to guide performance, enhance capabilities, and grow careers.
- We promote a psychologically safe environment where colleagues can comfortably ask questions or raise concerns.
- We respond in a timely way to our colleagues who ask questions or raise concerns.
- We keep commitments and manage our colleagues' expectations.
- We expect accountability among all colleagues, regardless of position or job title.
- We ensure our colleagues understand the standards that apply to their work.



WE ARE LEADERS.



Our Responsibilities as Colleagues

We drive positive change by seeking opportunities to grow personally and professionally. Our managers and colleagues support this growth. We celebrate our diversity and are strengthened by our different backgrounds and experiences. Treating each other with fairness and respect is fundamental to who we are. We invite conversation to create the best possible outcome for everyone involved. Together, we can flourish as an organization, as colleagues, and as individuals.

Respecting Each Other 

Equity, Inclusion, and Diversity 

Health and Safety for Our Colleagues 

Human Rights 

WE ARE COLLEAGUES.





Respecting Each Other

We encourage our colleagues to be their best and bring their authentic selves to work. We promote an environment where we can work free from any form of harassment, bullying, or inappropriate conduct.

Inappropriate conduct takes many forms and is experienced differently from one individual to another; it is determined by actions and the impact on others, regardless of intent.

This Is Who We Are:

- 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.
- We report inappropriate conduct without fear of retaliation.

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

- Supervisor,
Patient Food Services

WE ARE COLLEAGUES.

Q My supervisor often loses their temper and yells whenever they think 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 standards 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 report your concern to MEL.

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 them to stop, but they wouldn’t. We weren’t at work, and it was ‘after hours.’ 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.

Equity, Inclusion, and Diversity

We flourish when our teams invite and value each person's unique contributions and perspectives. We always do our part to help create a positive work environment where our colleagues can bring their authentic selves and fully utilize their talents.

At MetroHealth, we define diversity by both visible characteristics — like race, gender and ethnicity — and by the invisible qualities and influences that truly define who we are and make us unique: personality, lifestyle, thought processes, work experience, age, education, socioeconomic background, sexual orientation, gender identity, religious affiliation, military service, disability status, family history, community associations, and other factors.

For over 185 years, MetroHealth has been an organization of opportunity. This commitment is woven into our values and belief that our company is strongest when we embrace the strength of our differences. That means building a more diverse, equitable, and inclusive workplace for our colleagues, in our business partnerships, and in the communities we serve.

"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

WE ARE COLLEAGUES.

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.
- We 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.

Every Person Matters

We believe that our colleagues 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.

To Learn More See:

[HR-29: EQUAL EMPLOYMENT OPPORTUNITY AND NON-DISCRIMINATION](#)



[HR-38: WORKPLACE HARASSMENT](#)



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 standards.

Q What is Juneteenth?

A Juneteenth is a federal holiday that commemorates the end of slavery in the United States. On June 19, 1865, a Union general arrived in Galveston, Texas, and proclaimed to enslaved African Americans that the Civil War had ended and all slaves were free. We celebrate Juneteenth as a way to honor our African American colleagues, friends, and neighbors and celebrate what's best about America: unity.

Strengthening Our Values

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

- We manage our "blind spots" regarding empathy and tolerance — we all have them and are responsible for managing or eliminating them. We acknowledge that we all have unconscious biases and hold ourselves accountable to mitigate those biases.
- We Stop. Reflect. Choose. Stop before you act or speak. Reflect on what you want to say or actions you want to take. Choose to act in a way that reflects our values.
- We acknowledge missteps, apologize, clarify our intent, and do better next time.
- We use C.U.S. — C.U.S. is a TeamSteps concept 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.

WE ARE COLLEAGUES.

Health and Safety for Our Colleagues

We are committed to providing a healthy and safe workplace for our colleagues. We also create a place where patients, their families, loved ones, and others who visit MetroHealth feel welcome and safe. Together, we uphold our commitment to the health and safety of our community.

We know the biggest influence on workplace safety is our hardworking colleagues. Colleagues who are alert and aware, model safe work practices, and look out for patients and other colleagues every day.

This Is Who We Are:

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

We watch for and report safety hazards to the appropriate department. These may include:

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

Q I suspect a colleague has been working while under the influence of drugs, and I'm concerned that it's affecting their work and possibly the safety of patients. What should I do?

A Share your concerns with your supervisor. This will give us an opportunity to address the issue and connect them with resources that may be able to help.

To Learn More See:

*HR-07: DRUG-FREE
WORKPLACE*



HR-10: SMART DRESS



WE ARE COLLEAGUES.



Human Rights

We believe that healthcare and fair employment are human rights, and this commitment extends beyond our tagline, Devoted to Hope, Health, and Humanity. We maintain an ethical and transparent relationship with our business partners and suppliers/vendors through compliance with applicable laws regarding human rights, forced labor, human trafficking, and child labor. We expect the same commitment from our business partners and suppliers/vendors. MetroHealth will not knowingly do business with business partners and suppliers/vendors that engage in human rights abuse of any kind. Our position on human rights is compatible with the United Nations Guiding Principles on Business and Human Rights and consistent with our Mission, Vision, and Values.

This Is Who We Are:

- We understand our responsibility to compensate our colleagues fairly and abide by applicable employment laws.
- We are sensitive to and aware of the possibility a patient has been subject to abuse, domestic violence, sexual assault, neglect, exploitation, or human trafficking and report any concern as appropriate.
- We ensure our business partners and suppliers/vendors business practices comply with our *METROHEALTH THIRD-PARTY CODE OF CONDUCT* and report any human rights concern to Ethics and Compliance.

PC-05: ABUSE, DOMESTIC VIOLENCE, SEXUAL ASSAULT, NEGLECT, EXPLOITATION AND HUMAN TRAFFICKING



WE ARE COLLEAGUES.





Our Responsibilities as Caregivers

As caregivers who provide direct patient care and others who support our operations, we collectively serve as guardians of health and wellness for our patients. We provide high-quality care to each patient, ensuring we set and uphold the highest standards for ethical behavior and care delivery in our community. This includes everything from clinical excellence to the interactions we have with our colleagues, suppliers/vendors, and the community we serve.

Delivering Quality Care



Patient Rights



Protecting Patient Information



Academic and Research Standards



Relationships With Physicians and Other Third Parties



WE ARE CAREGIVERS.

Delivering Quality Care

We provide safe, equitable, high-quality care in a manner that is sensitive to our patients' individual needs. We treat each individual patient with empathy in a safe, welcoming environment. We leverage interdisciplinary team-based care that makes patient safety paramount and supports a speak-up culture.

This Is Who We Are:

- We respond to individual healthcare needs, making every reasonable effort to accommodate individual preferences and rights.
- We seek to involve patients in all aspects of their care.
- We maintain a safe and caring environment for patients that respects each person and treats everyone with dignity.
- We find the root cause for issues involving patient care and ensure it is addressed.
- We develop systems-based solutions to improve our delivery-of-care methods.
- We provide a psychologically safe workplace for colleagues to voice any issue concerning patient safety and/or quality.

WE ARE CAREGIVERS.



OUR CULTURE OF ETHICS

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

- Process Improvement Specialist

To Learn More See:

TEAMSTEPS



PC-85: REPORTING AND
REVIEWING SAFETY EVENTS





Q I just discovered I administered the wrong medication to a patient. What do I do?

A First, take care of the patient. Once you have addressed any urgent patient issues, notify the physician or other provider who is primarily responsible for the patient's care. Depending on practice at your location, you may also notify your manager or direct supervisor. Next, enter a safety event report with information about the patient and the event. The Safety Event Reporting System (SERS) application can be found on the desktop of every MetroHealth computer. The patient safety team evaluates all SERS and may request a follow-up discussion, called a "SWARM," to determine the root cause of the error.

Q I attempted to contact a team member about a patient concern, but they haven't returned my page. What should I do?

A Utilize the Epic On-Call Scheduler, a tool that provides the call escalation process. MetroHealth practices a culture of safety, and you should feel safe moving up the call list to provide appropriate care for a patient. Once you get a response, remember to use the TeamSteps tool 'C.U.S.' Explain that you are concerned, uncomfortable, and that the patient need is a safety issue.

WE ARE CAREGIVERS.

Patient Rights

We believe patients should be treated with dignity and respect at all times. We recognize that patients and family members are individuals with personal needs, feelings, preferences, and requirements. We ensure that patients are aware of, and exercise, their rights, and we encourage them to speak openly with their healthcare team.

This Is Who We Are:

- We have a moral stewardship and responsibility to address disparities in our community and eradicate historical and systematic barriers to provide quality healthcare to all.
- We recognize that some patients need additional resources to help us best serve them (such as language access services for patients with limited English proficiency).
- We include patients in their plan of care and provide information in a timely manner to ensure the best decisions are made regarding choices, where appropriate.
- We communicate clearly, concisely, and understandably.
- We give accurate and timely responses to patients' questions.
- We promptly report any suspicions or evidence of abuse, neglect, harassment, intimidation, or exploitation of a patient.
- We respect patients' consideration of privacy for every aspect of their medical care.

Emergency Medical Treatment and Labor Act (EMTALA)

We follow EMTALA, which includes providing emergency medical screening examinations and necessary stabilizing treatment to all patients, regardless of their ability to pay.

To Learn More See:

[PC-15: PATIENT RIGHTS AND RESPONSIBILITIES](#)



[PC-15A: PATIENT AND VISITOR BILL OF RIGHTS AND RESPONSIBILITIES](#)



[EC-32: EMERGENCY MEDICAL TREATMENT AND ACTIVE LABOR ACT \(EMTALA\)](#)



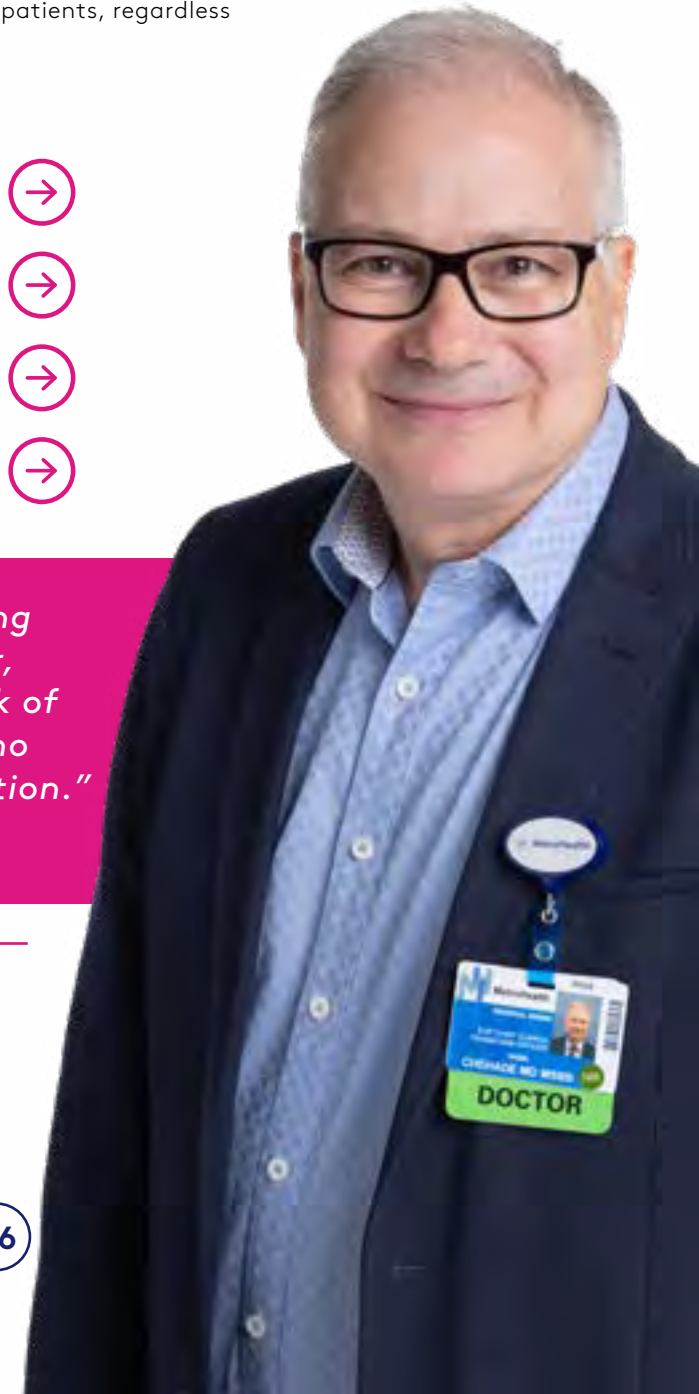
[EMTALA FAQs](#)



"Working at MetroHealth 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."

- RN Clinical Nurse

WE ARE CAREGIVERS.



Protecting Patient Information

Patients trust us to safeguard their protected health information (PHI). It takes all of us to honor that trust by complying with HIPAA, other confidentiality laws, and our policies. This means we access, use, and disclose patients' health information only when we have a:

- permissible business reason;
- HIPAA exception;
- patient authorization;
- legal obligation.

MetroHealth monitors access, use, and disclosure of PHI. We investigate and respond to privacy concerns. 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.

PHI

PHI is any information about health status, provision of healthcare, or payment for healthcare that is created or collected by a covered entity or business associate and can be linked to a specific individual.

To Learn More See:

PR-01: USE AND DISCLOSURE OF PROTECTED HEALTH INFORMATION



WE ARE CAREGIVERS.



OUR CULTURE OF ETHICS

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Appropriate Use and Disclosure of PHI

We only use or disclose PHI when we have a permissible 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.
- Health Care Operations – reviewing PHI while conducting internal reviews or audits.

Inappropriate reasons include:

- Mere curiosity.
- Checking the lab results of a family member without authorization.
- Responding to requests from patient friends or family not authorized by the patient.
- Responding to requests for patient-identifying or other confidential patient information from the news media or postings on social media.

This Is Who We Are:

- We are committed to protecting our patients' information and privacy as vigorously as if it were our own.
- We safeguard our patients' information against unauthorized access, use, and disclosure.
- We discuss patient information only with those who have a permissible need to know.
- We highlight stories on social media, social networking sites, and blogs only with patient's explicit permission.
- While we care about our colleagues, we recognize they are entitled to the same privacy as non-employee patients. We do not share information about services that colleagues receive as patients.

WE ARE CAREGIVERS.

Q My colleague asked me to check on their test result in Epic. Can I access their electronic medical record because they gave me permission?

A No. Even though your colleague gave permission, you do not have a permissible business reason to access their electronic medical record. Your colleague will need to check their MyChart account or contact their provider.

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

A 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 Health Information Management.

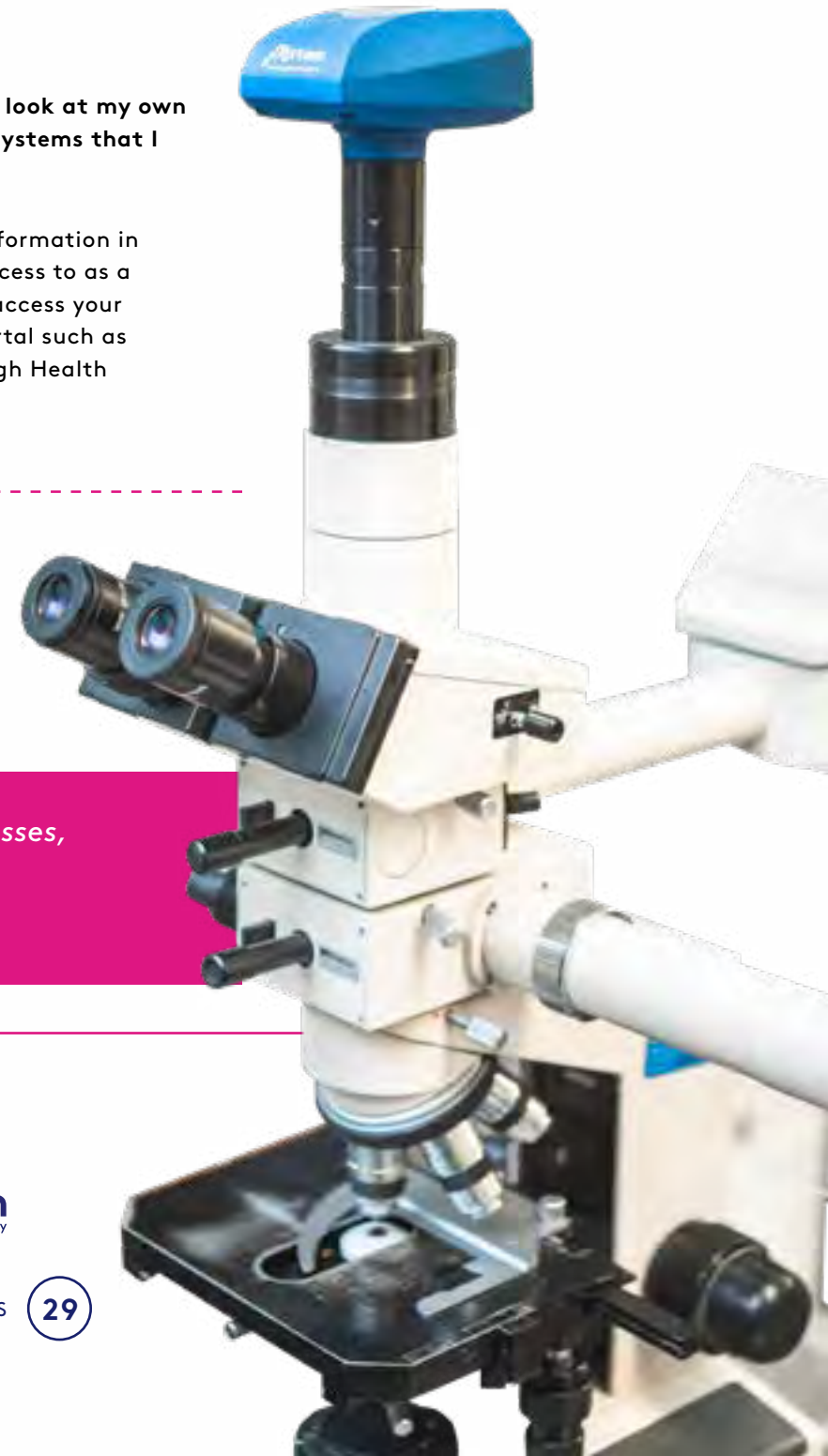
Q If I take care of a colleague who is hospitalized at MetroHealth, can I tell other colleagues that someone we work with is ill?

A No, you may only discuss need-to-know information with other colleagues involved in the colleague-patient's care. The colleague-patient decides whether to share their medical information with their supervisor and other colleagues.

"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."

- CT Technologist

WE ARE CAREGIVERS.



Academic and Research Standards

We conduct basic and clinical research responsibly and with scientific integrity. We protect the rights and well-being of research participants and conduct all research in accordance with regulatory and ethical standards.

Any research conducted at MetroHealth is approved in advance by the appropriate regulatory boards, and 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 to any animals used in our research.

"We believe research is an important part of healthcare delivery and is at the heart of all medical advances."

- VP of Research and Sponsored Programs

This Is Who We Are:

- We follow the highest ethical standards to remain in compliance with federal laws, state laws, and regulations in research, including investigations and/or clinical trials conducted by our physicians, scientists, 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 external sponsor 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, including grant mismanagement, failure to protect subjects, and data security/privacy.

WE ARE CAREGIVERS.



Intellectual Property

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

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

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

A 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 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 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 their contact information with the researcher?

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

Q I'm not sure whether my project qualifies as research. Where can I go for help?

A MetroHealth has an Institutional Review Board (IRB) that oversees all human subject research. They can help you determine whether your project requires IRB review. Contact the board by email at IRBoffice@metrohealth.org

To Learn More See:

EC-42: RESPONDING TO ALLEGATIONS OF RESEARCH MISCONDUCT



GEN-48: INTELLECTUAL PROPERTY AND INNOVATIONS



WE ARE CAREGIVERS.

Relationships With Physicians and Other Third Parties

We acknowledge that physicians and other healthcare 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 colleagues, physicians, or any other healthcare 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 Ethics and Compliance.

Kickbacks and Inducements

Consult Legal 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.

To Learn More See:

EC-14: FEDERAL ANTI-KICKBACK STATUTE AND STARK LAW



WE ARE CAREGIVERS.



OUR CULTURE OF ETHICS

32

Our Responsibilities as Community Members

We put people in our community first because, for us, it has always been the right thing to do. We act ethically and responsibly to promote the health and well-being of those in our community. Our community members include colleagues, patients, business partners, suppliers/vendors, and the people of Northeast Ohio.

Our Commitment to the Health and Well-Being of Our Community →

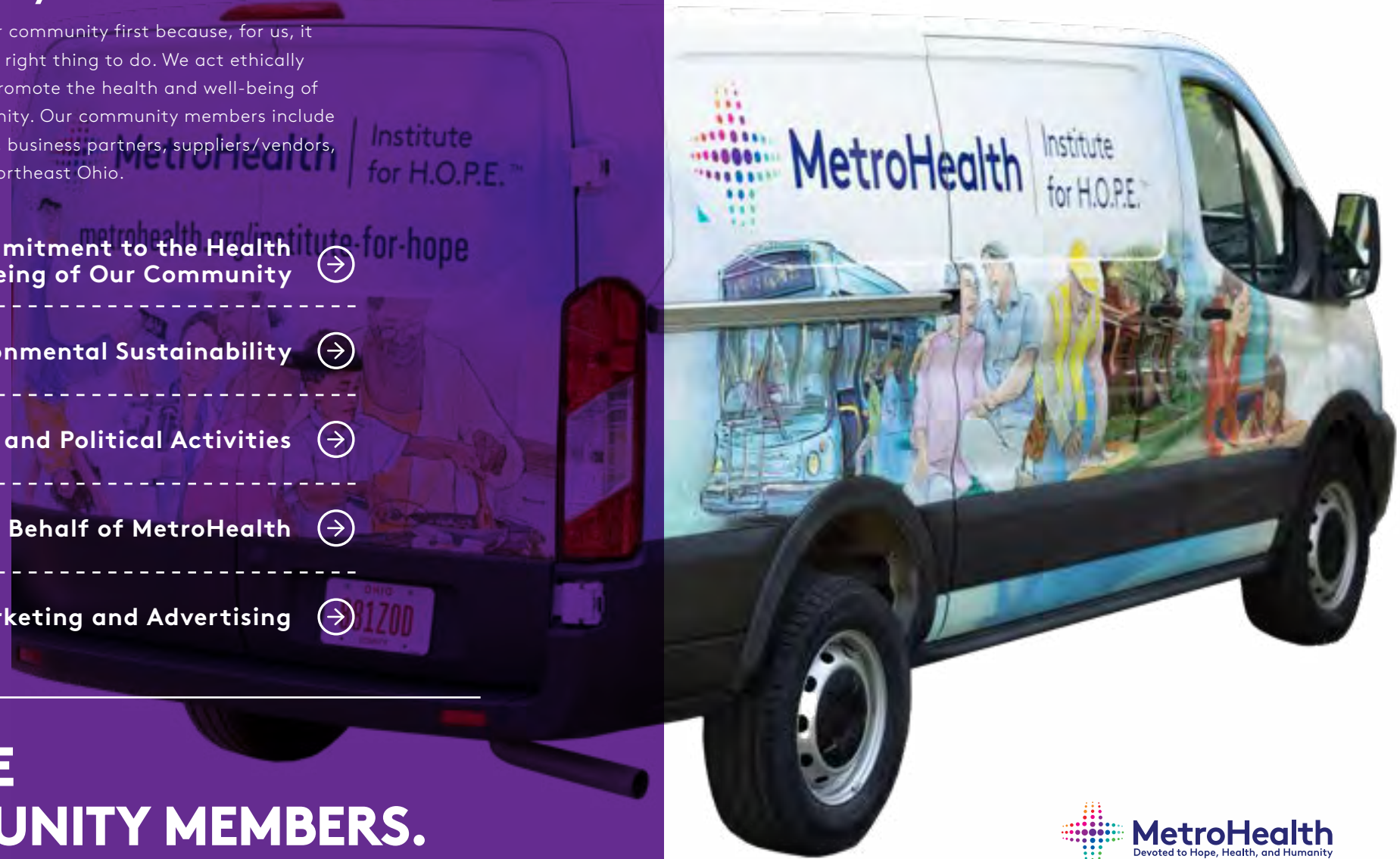
Environmental Sustainability →

Public Policy and Political Activities →

Speaking on Behalf of MetroHealth →

Marketing and Advertising →

WE ARE COMMUNITY MEMBERS.





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 people from all walks of life. We believe that the diversity of patients and our staff enriches our environment and gives us an informed worldview.

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 our patients but also through the knowledge that a healthy community requires us to be proactive and engaged.

“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, RN Provider

This Is Who We Are:

- We treat every patient, regardless of their economic situation with the same level of attention – full attention.
- We meet every patient where they are on their own health journey and see them as more than their illness or injury.
- We respect the diverse cultures and personal backgrounds of our patients and each other.
- We treat every person with dignity, respect, and empathetic listening.
- We ensure equity for all by assisting our patients and our employees with preventative care, services, and support in order to improve their overall well-being.

WE ARE COMMUNITY MEMBERS.



Environmental Sustainability

We are stewards of the natural environment and operate our facilities in ways that minimize the impact on the environment while maintaining a healthy and safe workplace. We recognize our operations and decisions affect the health of our colleagues, patients, as well as the environment of our region and beyond.

This Is Who We Are:

- We are proactive in reducing waste, using energy and natural resources more efficiently, and taking actions to positively impact air quality and climate change.
- We help build sustainable neighborhoods through affordable housing, provide access to healthy local foods, support smart accessible transportation, and increase community access to green space.
- We support local, diverse, and small businesses as a sustainable economic development strategy and encourage suppliers/vendors to protect the environment and climate of our shared community.

To Learn More See:

[SUSTAINABILITY](#)



**WE ARE
COMMUNITY MEMBERS.**

Public Policy and Political Activities

MetroHealth, as a public hospital, is dependent on public policy and funding decisions at the federal, state, and local levels of government. The Government Relations team works with senior leaders to set priorities for MetroHealth and implements plans to achieve these priorities.

As individual citizens, we have the right to participate in the political process, including supporting candidates, political parties, and other interest groups of our choosing. We also have the right, on our own time and at our own expense, to run for elective office and to interact with officeholders, in our personal capacity. When we participate in the political process, it is important to separate personal and MetroHealth-related political activities.

To Learn More See:

GEN-95: GOVERNMENT RELATIONS



GEN-97: POLITICAL ACTIVITIES



This Is Who We Are:

- We defer to Government Relations to engage in public policy advocacy on behalf of MetroHealth.
- Senior leadership may recruit employees for voluntary advocacy on behalf of MetroHealth when public policy significantly impacts patients or MetroHealth’s business interests.
- When participating in political activities as individuals, we make it clear that our views and actions are our own and not those of MetroHealth, unless authorized to do so.
- MetroHealth does not endorse political candidates.
- We inform Ethics and Compliance when running for or seeking appointment to public office. The Ethics and Compliance Department will review the facts and respond to any potential conflicts of interest between your MetroHealth employment and your elected/appointed position.

WE ARE COMMUNITY MEMBERS.

Lobbying

MetroHealth can participate in lobbying, but certain activities may require public disclosure and reporting requirements. Our Government Relations staff are registered lobbyists and are authorized to advance MetroHealth's positions with government agencies and leaders.

Contact Government Relations before:

- Engaging with legislators, senior regulatory officials, executive branch officials, or their staffs on behalf of MetroHealth.
- Initiating efforts to influence legislative or administrative action on behalf of MetroHealth.
- Participating in public policy or political activities on behalf of MetroHealth.

“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.”

- Physician

- Q I am supporting a local political candidate who openly supports MetroHealth and the work we do. May I speak out at their 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 their campaign.
- Q As an employee, I have received requests from leadership encouraging me to follow up with government leaders about Medicare 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.
- Q As a leader in my field, I'm passionate about a piece of legislation. May I contact my elected officials on behalf of MetroHealth?**
- A** In this situation, you should contact Government Relations, governmentsrelations@metrohealth.org, to determine the right approach.

WE ARE COMMUNITY MEMBERS.





Speaking on Behalf of MetroHealth

We formally designate certain colleagues to speak publicly on MetroHealth's behalf to ensure we speak with one voice when providing information to the public and the media.

This Is Who We Are:

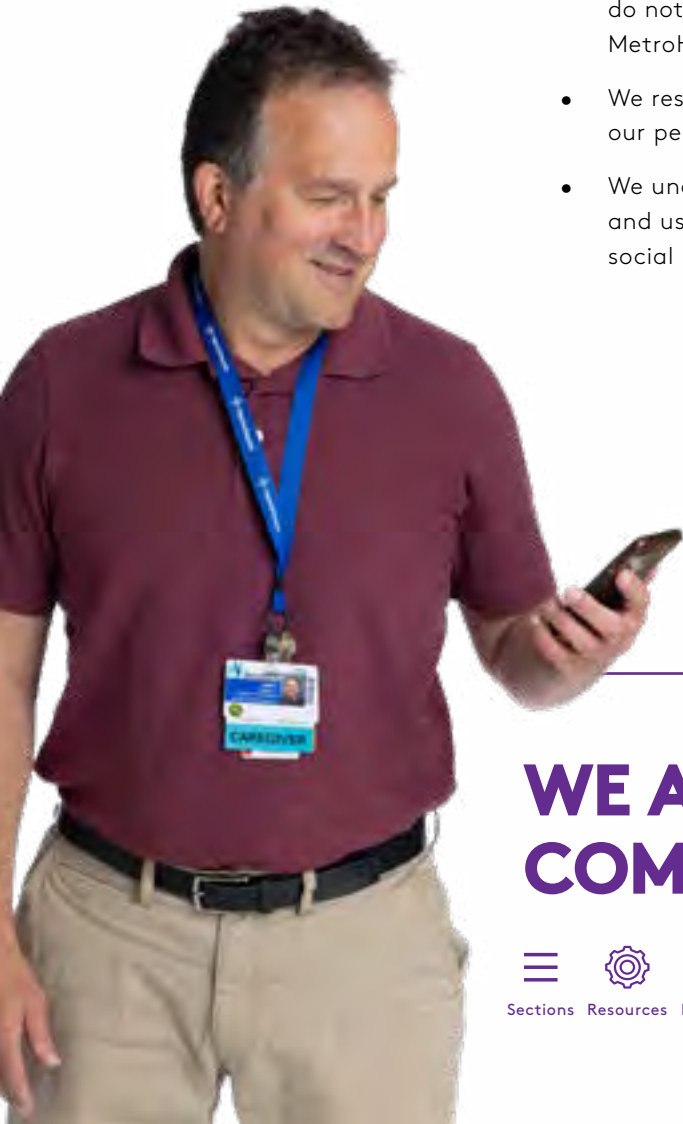
- We obtain approval from Media Relations before responding to or releasing information to the media, directly or indirectly speaking, or acting on behalf of MetroHealth.
- We provide accurate, complete, and consistent information to the public through designated colleagues.
- We make clear that the opinions shared are our own and not those of MetroHealth when speaking publicly on our own behalf, including presentations at professional and scientific conferences.

WE ARE COMMUNITY MEMBERS.



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

- **Release of Information Specialist**



Social Media

We recognize the importance of social media and believe it can be a great vehicle for communicating our commitment to the community. We encourage our colleagues to connect with family, friends, and each other through social media. We are mindful that posting to social media can result in unintended consequences that could impact both us and MetroHealth.

This Is Who We Are:

- We take care to ensure our personal social media posts do not contain patient information or confidential MetroHealth business information.
- We respect our MetroHealth values even when using our personal social media accounts.
- We understand we are responsible for what we post and use common sense and good judgment with all social media.

Social Media Scenarios

Consider the following real-life scenarios of social media posts that can result in unintended consequences:

- Photos that inadvertently reveal confidential business or patient information
- Photos or information regarding a high-profile patient or visitor

Q I received a media request regarding MetroHealth. What do I do?

A If you receive a media request regarding MetroHealth, notify Media Relations, comms@metrohealth.org. They will review the request and direct the official response.

To Learn More See:

GEN-80: SOCIAL MEDIA



GEN-32: MEDIA COMMUNICATIONS



WE ARE COMMUNITY MEMBERS.

Marketing and Advertising

To best serve our patients and the public, we keep them informed about our services and initiatives that impact the community. Communications about our services and initiatives use inclusive language that recognizes the diversity of our patients and colleagues and promotes equity in healthcare.

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, advertisements, and communications.
- We are professional and consistent with our stance on equity, inclusion, and diversity.
- We protect the integrity of our brand standards and only use approved marketing materials provided by Marketing and Communications.



WE ARE COMMUNITY MEMBERS.

Our Responsibilities as Business Partners

We recognize the integral role our business partnerships play in the success of our Mission, Vision, and Values. We maintain strong connections with our business partners and seek relationships based on trust, fairness, and mutual advantage.

Conflicts of Interest 

*Fair Dealing With Business Partners
and Suppliers/Vendors* 

Business Courtesies and Gifts 

Fair Competition 

WE ARE BUSINESS PARTNERS.



Conflicts of Interest

We make decisions and act in the best interest of MetroHealth rather than for personal gain. We exercise the utmost good faith in all transactions related to our roles and disclose any potential and actual conflicts of interest in a timely manner.

This Is Who We Are:

- We do not use our position, or knowledge gained in our position, for personal benefit.
- We seek advanced approval of any outside interest that might appear to influence our decisions.
- We ask for guidance if our outside activities would make others, internal or external to MetroHealth, question our loyalty or motives.

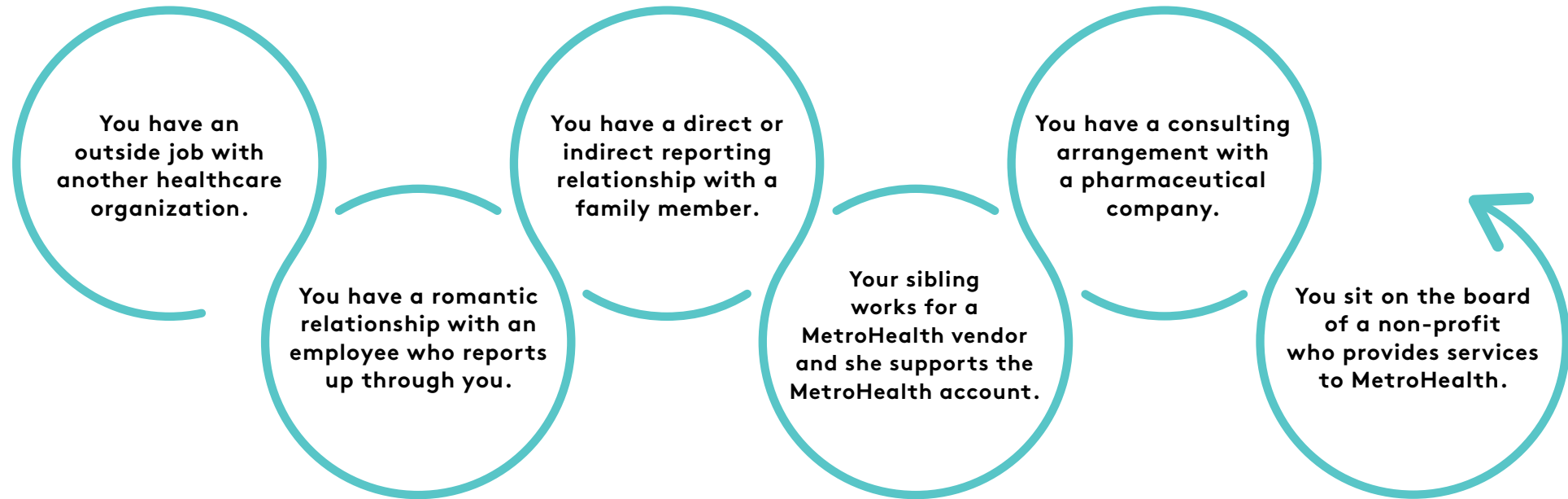


WE ARE BUSINESS PARTNERS.



Conflict Scenarios

Being able to recognize a potential conflict can help us avoid one. While we cannot detail every situation where a conflict may occur, here are a few examples of common conflicts:



To discuss any potential or actual conflicts of interest, email [Ethics and Compliance](#).

WE ARE BUSINESS PARTNERS.



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

Q My sibling's company recently won a bid for a MetroHealth contract. Do I need to tell anyone?

A Yes. Depending on your position, your sibling's position as a MetroHealth supplier/vendor could influence your MetroHealth duties. Contact Ethics and Compliance to discuss next steps.

Q I am an RN in the operating room. A job opening was just posted; may I reach out to the hiring manager to recommend my family member?

A No. As a MetroHealth workforce member, you cannot influence the hiring of a family member. This includes reaching out to anyone involved in the hiring process. Encourage your family member to apply through the posting.

Q I am a provider at MetroHealth, and I would like to moonlight at a non-MetroHealth hospital on weekends. Do I need to notify someone?

A Yes. Prior to engaging in a "Reportable Outside Activity" (which includes moonlighting), MetroHealth employees must request and receive advance approval via the electronic "Outside Activities Request Form." For more information, review the [OUTSIDE ACTIVITIES TOOLKIT](#).

**WE ARE
BUSINESS PARTNERS.**



Managing Conflicts

We can avoid and manage most conflicts when we take certain steps. We are proactive and, whenever possible, avoid situations that can lead to even the appearance of a conflict. If we find ourselves in a potential conflict of interest, we discuss with Ethics and Compliance.

Hiring Former and Current Government Employees

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

- 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. Review the Reportable Outside Activities Toolkit and discuss any questions with your supervisor or Ethics and Compliance. If required, submit the appropriate forms for approval prior to starting your outside employment.
- Q** I am a Physical Therapist. My sibling 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. Additionally, you should report the conflict to Ethics and Compliance who will advise you on next steps.

To Learn More See:

[EC-08: CONFLICTS OF INTEREST](#)



[EC-10: OUTSIDE ACTIVITIES](#)



WE ARE BUSINESS PARTNERS.

Fair Dealing With Business Partners and Suppliers/Vendors

We recognize that responsible, reliable business partners are key to MetroHealth's operations and success. Our Third-Party Code of Conduct outlines the expectations we have for our business partners and suppliers/vendors, but we also recognize that our business partners' success depends on us. We have an obligation and responsibility to treat our business partners and suppliers/vendors lawfully and in an ethical manner.

This Is Who We Are:

- We always select business partners and suppliers/vendors on the basis of objective criteria, not based on personal relationships or friendships.
- We never take advantage of anyone, including our business partners and suppliers/vendors, through manipulation, misuse of confidential information, misrepresentation of facts, or any other unfair dealing or practice.
- We conduct our business relationships with honesty, fairness, and mutual respect.
- We protect the confidential and proprietary information of our third-party partners.

"We are committed to utilizing diverse business partners and suppliers in support of our community."

- Director of Transformation Operations and Transition

Key Definitions

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

Supplier/Vendor – A general term to refer to providers of goods or services.

Supplier Diversity

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

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

To Learn More See:

SC-05: PROCUREMENT, MANAGEMENT AND DISPOSAL OF PRODUCTS



GEN-88: PROCUREMENT AND MANAGEMENT OF PROFESSIONAL SERVICES



THE METROHEALTH SYSTEM THIRD-PARTY CODE OF CONDUCT



WE ARE BUSINESS PARTNERS.

Additional Responsibilities of Our Leaders

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

As leaders:

- We work with our business partners and suppliers/vendors to ensure that they understand our commitment to ethics and compliance.
- We select goods and services on the basis of quality, effectiveness, economy, and need.
- We employ fair business practices when working with our business partners and suppliers/vendors.
- We watch out for any signs that our business partners and suppliers/vendors are violating applicable laws or regulations.
- We insist on honest accounting of time, materials, and prompt acceptance of materials, to meet our standards.
- We disclose any situation that may appear to involve a conflict of interest.

WE ARE BUSINESS PARTNERS.



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

A 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 Ethics and Compliance for guidance.

Q I am responsible for selecting a new company to provide services to our team. My best friend's company would be great for the job. Is it an issue if I use their company?

A Yes. Granting a contract to your friend could be seen as an improper use of your position. Contact Supply Chain, supplychain@metrohealth.org, for guidance.

Q I work in Supply Chain and am leading a department's negotiations with a medical device company. The negotiation team includes a MetroHealth colleague whose sibling works for the device company. Is that an issue?

A Yes. The colleague's involvement in negotiating with a company that a family member owns poses a conflict of interest. Raise your concern to MEL or to Supply Chain, which works with Ethics and Compliance to review the situation, resolve the conflict, and ensure all negotiations are free from conflict.

Business Courtesies and Gifts

We are occasionally offered a gift, entertainment, or business courtesy from a supplier/vendor, which vendors view as a normal part of doing business. Before we accept a business courtesy or gift, we review our policies and ensure that it is appropriate.

As public employees, the rules governing gifts and entertainment can be complicated. Except as noted below, gifts, entertainment, and business courtesies may not exceed \$75 per year from a supplier/vendor or prospective supplier/vendor. If you have any questions, discuss the matter with your supervisor or Ethics and Compliance.

- We do not accept cash or cash equivalents.
- We do not request or solicit business courtesies or gifts.
- We accept business courtesies and gifts that are nominal in value – less than \$75.
- We only accept gifts given infrequently – no more than once per quarter.
- We do not accept gifts that create an obligation for us as a MetroHealth employee.
- We only accept gifts that do not influence business decisions.
- We do not take advantage of our position with vendors and other business partners.
- We do not bring into question MetroHealth’s motives, business integrity, appropriate business practices, or reputation.

To Learn More See:

[EC-09: BUSINESS COURTESIES AND GIFTS](#)



[EC-12: GIFTS TO PATIENTS](#)



Q Our department treats a patient who is financially struggling. With the holidays coming up, a few staff members want to “adopt” the patient and provide some gifts. Can we do that?

A No. Adopting a patient will likely exceed the MetroHealth policy. Generally, items provided to patients cannot exceed \$15 per event and \$75 per patient annually, with some exceptions. Further information can be found in EC-12 Gifts to Patients or contact Ethics and Compliance for guidance.

Q My team completed a major project in collaboration with a vendor. The vendor has offered to treat us to dinner and drinks at Cleveland’s newest upscale restaurant. Can we accept the invitation?

A No. While accepting a meal seems appropriate under the circumstances, the dinner and drinks are likely greater than \$75. See EC-09 for guidance on accepting gifts/business courtesies from vendors or contact Ethics and Compliance with questions.

WE ARE BUSINESS PARTNERS.

Prohibited Gifts

We do not solicit gifts, and we do not accept cash or cash equivalents, including gift cards or certificates for specific stores.

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, decline it and contact your Supply Chain representative.

Gifts and Entertainment – Government Representatives

We take extra care when dealing with government officials. We do not offer gifts or other benefits, including entertainment, to government officials. There are very limited exceptions to this rule, and in these rare cases, we seek advanced approval from Government Relations, Ethics and Compliance, or Legal.

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 (for example, flowers or a box of candy).

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

A 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 Legal with specific contract questions.



WE ARE BUSINESS PARTNERS.

Fair Competition

We believe that open and fair competition is in the best interest of the public. We comply with all applicable laws, rules, and regulations that govern the way companies compete. These include laws designed to foster free and fair competition. Even the appearance of improper agreements with competitors can harm our reputation and risk legal action. We approach competitor interactions carefully and strive to avoid any appearance of impropriety

We recognize antitrust laws are complex, and compliance requirements can vary depending on the circumstance. If we have any questions about whether our conduct may implicate the antitrust laws, we discuss the matter in advance with Legal.

This Is Who We Are:

- We understand that the antitrust laws apply to us and to our work at MetroHealth and that we are each responsible for compliance.
- We seek advice from Legal before taking any action that could possibly be a violation.
- We use good judgment when meeting with competitors and avoid even the appearance of impropriety in our competitive interactions.
- We gather information about competitors fairly and from publicly available sources.
- We do not use improper methods such as bribery, stealing, hacking, or misusing others' trade secrets to gain a competitive advantage.
- We never encourage third parties or former employees of competitors to provide us with confidential information.
- We do not discuss any competitively sensitive aspect of our business with competitors without prior Legal approval.
- We report any antitrust concerns or potential violations of the antitrust laws to Legal.

WE ARE BUSINESS PARTNERS.

Q I am worried that another healthcare institution is trying to steal our team members and that any losses could be detrimental to patient care. Can we agree not to try to recruit each other's staff?

A No. Such an agreement is illegal, even if motivated by a desire to provide the best possible care for our patients. If another institution proposes such an arrangement to you, you should decline to participate and immediately notify Legal.

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 Legal and delete the email.



WE ARE BUSINESS PARTNERS.



We Are MetroHealth

Acting with ethics and integrity is central to everything we do, from keeping accurate records to responding to government inquiries. As colleagues, we have an individual responsibility to protect the assets, information, and resources of MetroHealth.

*Confidential
Business Information* →

Use of MetroHealth Resources →

*Meeting Federal Healthcare
Program Requirements* →

*Government Interactions
and Inquiries* →

Accurate Recordkeeping →

*Our Ethics and
Compliance Program* →

*MetroHealth
Reporting Guide* →

Closing Thoughts →

WE ARE METROHEALTH

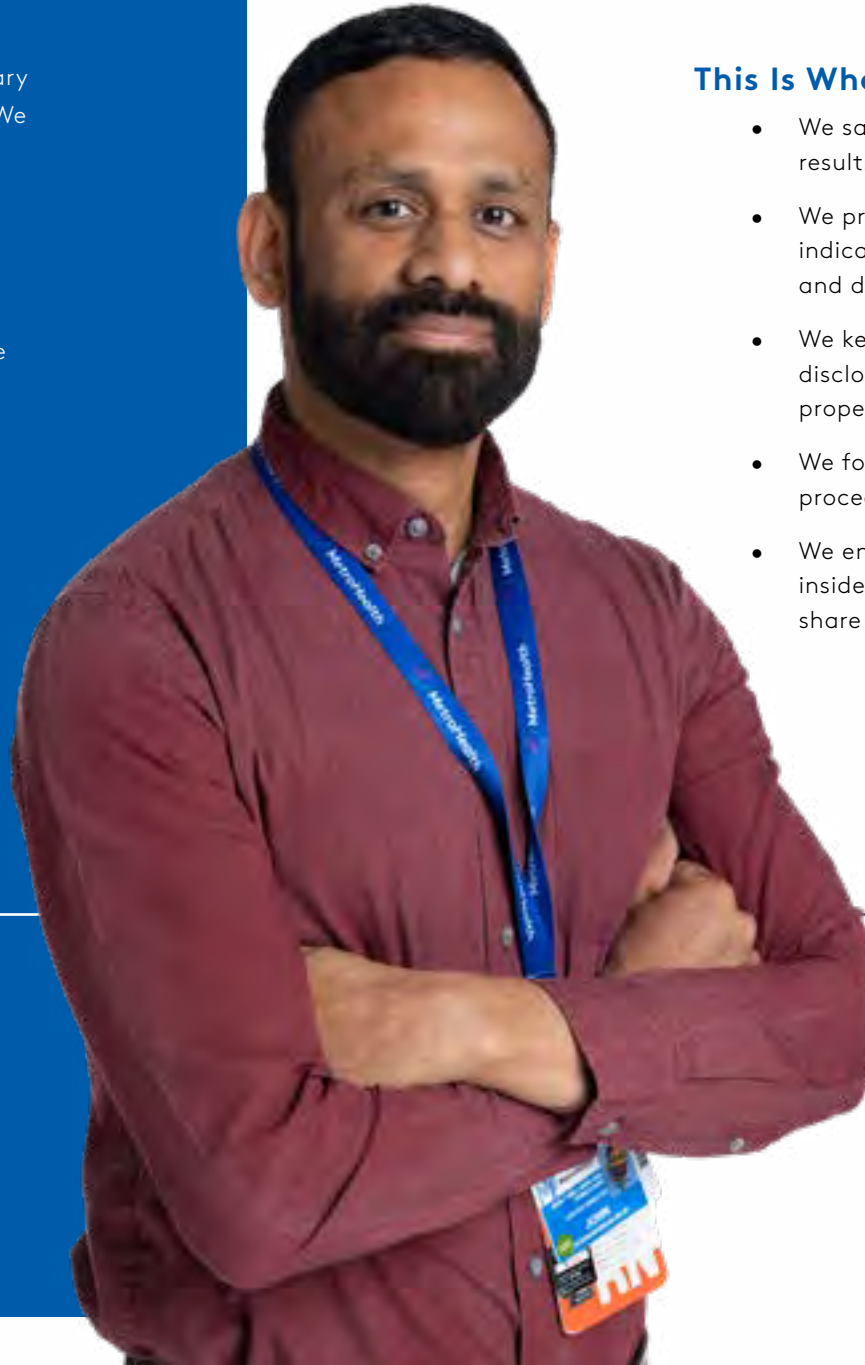


Confidential Business Information

We share a responsibility to protect MetroHealth's proprietary information from loss, misuse, or inappropriate disclosure. We are subject to the Ohio Public Records Act, which generally requires us to disclose public records upon request. It is important that we remember that many of our emails and documents may be subject to these requests.

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, lists, and agreement terms
- Intellectual property, including inventions, patents, trade secrets, and copyrights
- Data developed or purchased by MetroHealth or entrusted to us by third parties
- Marketing data, business and/or strategic plans



This Is Who We Are:

- We safeguard confidential information, research results, and patients' information.
- We properly label confidential information to indicate how it should be handled, distributed, and destroyed.
- We keep confidential assets secure to prevent disclosure and never share research or intellectual property without proper authorization.
- We follow our computer and network security procedures to prevent unauthorized access.
- We ensure any information we give to others, both inside and outside of MetroHealth, is appropriate to share with the person to whom we are providing it.

WE ARE METROHEALTH

Cybersecurity

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

- Follow our standards and practices that are designed to protect our networks, computers, programs, and data from attack, damage, or unauthorized access.
- Protect usernames and passwords and never share passwords or use the password of another colleague.
- Be alert to phishing scams or other attempts to uncover sensitive personal or corporate information.
- Don't open suspicious links in emails, even if the source is a known entity.
- Any laptop computer, phone, or other mobile device with patient or other sensitive information should be encrypted and in our control at all times.
- Report the loss of any device that contains sensitive information immediately to the IS Service Desk.
- Report suspicious activity immediately to the IS Service Desk 24/7 or contact Ethics and Compliance.

To Learn More See:

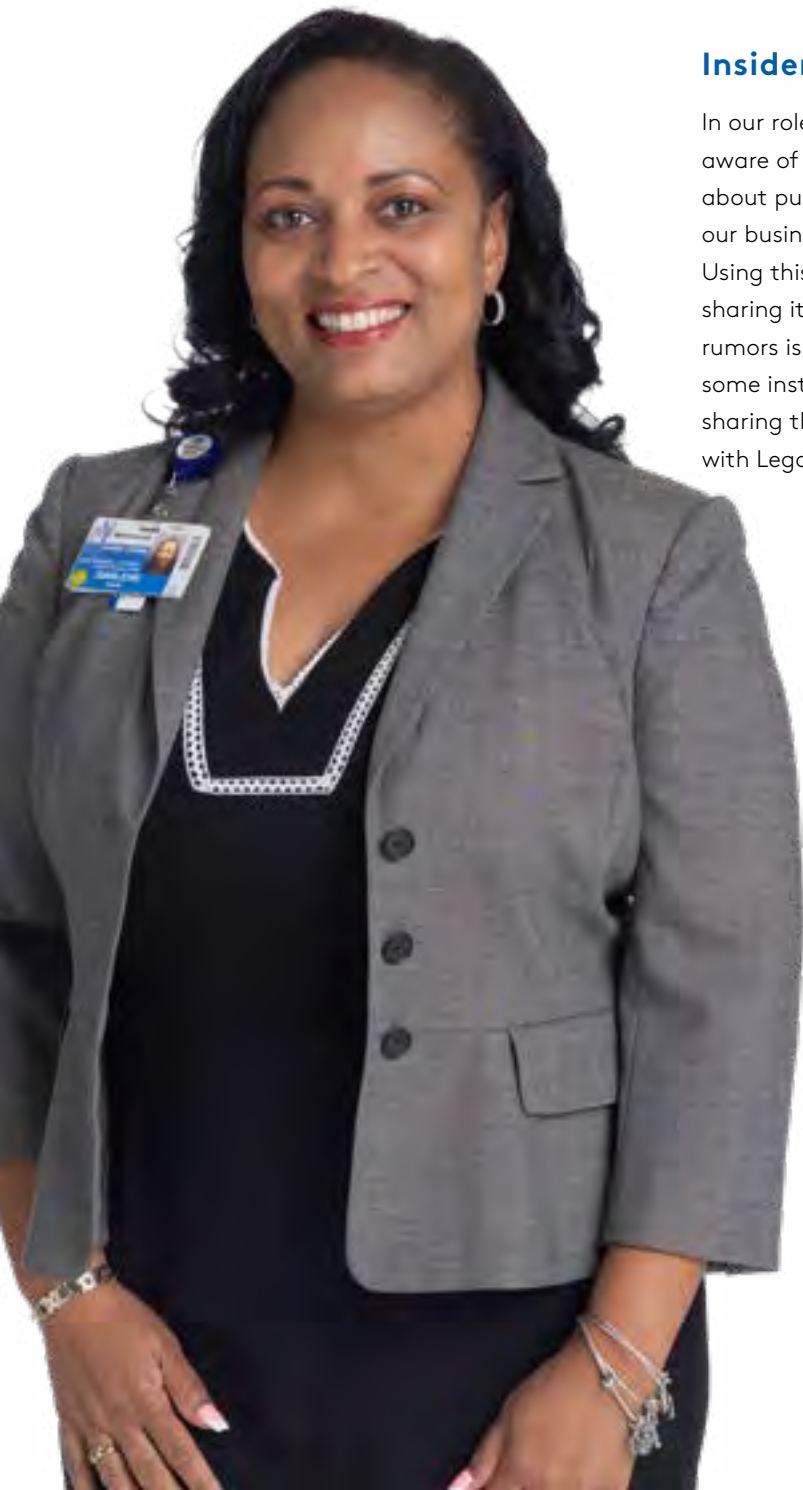
IS-18: EMAIL USAGE



GEN-02: RETENTION AND DISPOSAL OF INFORMATION, INCLUDING PUBLIC RECORDS



WE ARE METROHEALTH



Insider Trading

In our roles at MetroHealth, we may become aware of material, non-public information about publicly traded companies, including our business partners and suppliers/vendors. 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 sharing this information, discuss the matter with Legal.

- Q I have access to confidential and trade-secret information and want to ensure it's protected. What can I do?**
- A** Suggestions include: marking the document(s) confidential/proprietary when appropriate, limiting access to only those who need to know the confidential information, and ensuring the information is stored securely. Reach out to Legal for further guidance.
- Q I just discovered that my laptop is missing. What should I do?**
- A** 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.
- Q If I am coming right back, do I have to log out of my workstation?**
- A** Yes. Don't leave a workstation with your sign-on credentials still active. Everyone must log off/tap out before leaving a workstation.
- Q I received a public records request. What do I do?**
- A** Contact Legal for issues related to public records requests.

WE ARE METROHEALTH



Use of MetroHealth Resources

We provide more than medicine to the community we serve. The public trusts us to protect, maintain, and use MetroHealth resources to carry out our mission. We safeguard these assets to better serve our colleagues, patients, and the community.

This Is Who We Are:

- We use resources for MetroHealth business and keep them in good condition.
- We follow proper procedures for disposing of resources and equipment.
- We follow MetroHealth standards to keep our equipment safe and secure, such as those regarding equipment storage, passwords, installing applications/software, and more.
- We limit the personal use of MetroHealth resources to occasional and minimal occurrences, where the cost to MetroHealth is insignificant and it does not interfere with our duties or the performance of the MetroHealth systems.

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

- Medical Team Assistant

WE ARE METROHEALTH

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

- Q** Do I need to check with my manager before donating extra or used MetroHealth supplies?
- A** Yes. Prior to donating any extra or used MetroHealth supplies, you should discuss with your manager.
- Q** I twisted my ankle while hiking. I don’t have time to call off and go to Express Care, but I have a friend in radiology. Can my friend take a quick image of my ankle?
- A** No. You should talk to your supervisor and seek medical care. We do not use MetroHealth resources to treat ourselves, family members, or friends outside of registered visits. We register, document, and bill for all treatment provided to patients.

To Learn More See:

SC-05: PROCUREMENT, MANAGEMENT AND DISPOSAL OF PRODUCTS



Meeting Federal Healthcare Program Requirements

We operate in a highly regulated industry subject to extensive and complex federal and state laws, rules, regulations, and complex standards. We comply with all requirements that apply to our business to protect MetroHealth, our patients, and the Medicare and Medicaid programs.

We each do our part to ensure services billed are accurate and that insurance claims submitted to the government, third-party payors, and patients meet all federal healthcare program requirements. We prevent and detect fraud, waste, and abuse by monitoring and verifying that claims are submitted accurately and appropriately. We direct billing questions or suspicions of improper claims to our supervisors or Ethics and Compliance.



This Is Who We Are:

- We comply with all federal healthcare program requirements, including billing standards, and address inquiries quickly and honestly.
- We only bill for medically necessary services actually provided to our patients.
- We assign codes that accurately reflect documentation in the medical record.
- We ensure there is appropriate documentation for all financial reports and 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 when discovered.

To Learn More See:

EC-15: DETECTION AND PREVENTION OF FRAUD, WASTE AND ABUSE AND APPLICABLE FEDERAL AND STATE LAWS



EC-15A: FEDERAL AND STATE RULES



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Abuse

Abuse involves practices that are inconsistent with sound fiscal, business, or medical operations and which result in unnecessary costs. Abuse involves paying for items or services where there is no legal entitlement to that payment and the provider has not knowingly or intentionally misrepresented facts to obtain payment.

Abuse examples include:

- Unknowingly billing for unnecessary medical devices.
- Unknowingly billing for brand-name drugs when generics are dispensed.
- Unknowingly misusing codes on a claim.
- Unknowingly double-billing, upcoding, or unbundling codes.

Fraud

Fraud is the intentional deception or misrepresentation in order to gain benefit. Fraud can also involve other corrupt practices such as bribery or kickbacks.

Fraud examples include:

- Knowingly billing for services not rendered or supplies not provided.
- Knowingly altering claim forms or medical records to receive a higher payment.
- Falsifying credentials.

Waste

Waste involves misusing resources that results in unnecessary costs to the Medicare/Medicaid programs, such as overusing services.

Waste examples include:

- Ordering excessive diagnostic tests.
- Prescribing 90 days of medication when only 7 days is needed.
- Offering, receiving, or paying bribes.

Q A colleague received a call from a patient stating that their insurance company will not pay for certain radiology services based on the diagnosis code on the claim. The patient asked your colleague to change the diagnosis code to a code that would be paid by the insurance company and the colleague agreed to change the diagnosis code. Should I say something about this?

A Yes. Let your colleague 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.

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Government Interactions and Inquiries

As a hospital system, we are subject to many rules established by the government. 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:

- If we receive an inquiry or a visit from regulators or government authorities, we notify Legal before answering any questions or providing information.
- We comply fully with all applicable laws and standards.
- We screen all new hires, medical staff business partners, and suppliers/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.

To Learn More See:

EC-06: FEDERAL AND STATE EXCLUSION LISTS



PR-19: SERVICE OF LEGAL PROCESS, 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 healthcare programs
- Is suspended or debarred from federal government contracts
- Has not been reinstated in a federal healthcare program after a period of exclusion, suspension, debarment, or ineligibility

We routinely search federal and state exclusions lists, including the Ohio Department of Medicaid Provider Exclusions and Suspension List, the Office of Inspector General's List of Excluded Individuals and Entities (LEIE), the General Services Administration's System for Award Management (SAM), and the Department of Treasury's Specifically Designated Nationals and Blocked Persons List (SDN).

WE ARE METROHEALTH



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.

Maintaining complete and timely records inspires trust in our colleagues, patients, and business partners while demonstrating 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. Our records (with certain exceptions) are subject to the Ohio Public Records laws and may be shared with people outside of MetroHealth.

This Is Who We Are:

- We follow applicable standards when creating, retaining, or destroying MetroHealth records.
- We are always clear, concise, truthful, and accurate when recording any information.
- 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.

Record Management

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

All of us must be familiar with the recordkeeping procedures that apply to our jobs, as we are accountable for the accuracy and truthfulness of

the records we produce. We are responsible 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 Legal.

Q Before moving to a new office, I was 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 and then contact Legal (regarding non-PHI information) or Privacy (regarding PHI) for further assistance in determining proper retention and destruction requirements.

To Learn More See:

GEN-02: RETENTION AND DISPOSAL OF INFORMATION, INCLUDING PUBLIC RECORDS



WE ARE METROHEALTH

Our Ethics and Compliance Program

Our Ethics and Compliance Program exists 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.

Ethics and Compliance Mission

At MetroHealth, we are leading the way to an ethically focused, compliant organization through education, collaboration, shared values, and individual responsibility.

The Goals of our 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.

Elements of MetroHealth's Ethics and Compliance Program

As MetroHealth, we are committed to maintaining a culture that promotes the prevention, detection, and resolution of conduct that does not conform to the Code and our standards. The actions of each of us are critical to upholding this commitment.

- **Oversight** – the Audit and Compliance Committee of the Board of Trustees provides high-level oversight to Ethics and Compliance to ensure that we maintain 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* 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, compliance issues, and policies.
- **Monitoring and Auditing** – with the assistance of internal auditors and external consultants, Ethics and Compliance 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 Ethics and Compliance, 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 ensures the Code and our standards are followed by all employees.

To Learn More See:

[EC-01: ETHICS AND COMPLIANCE PROGRAM](#)



WE ARE METROHEALTH

MetroHealth Reporting Guide

Resource	For help with	Contact
Your manager	Any concerns.	<i>Speak with them directly.</i>
MetroHealth Ethics Line (MEL)	Concerns, questions, or reports about suspected violations of the Code, laws, or MetroHealth policies Anonymous reporting options.	<i>Available 24 hours a day: Call: 216-778-1660 Text: 216-600-1456 www.metrohealth.org/compliance</i>
Ethics and Compliance	Concerns, questions, or reports about suspected violations of the Code, laws, or MetroHealth policies.	<i>compliance@metrohealth.org</i>
Human Resources	Concerns, questions, or reports about Human Resources issues.	<i>laborrelations@metrohealth.org</i>
Government Relations	Questions or concerns about political activity or any state, federal, or local legislation that affects MetroHealth.	<i>governmentrelations@metrohealth.org</i>
Legal	Concerns or questions about suspected violations of the law, interpretations of law, or communications under the attorney-client privilege.	<i>legal@metrohealth.org</i>
Patient Safety	Concerns and events regarding a patient's safety or care.	<i>File a report through the Safety Event Reporting System (SERS), accessible on every MetroHealth computer.</i>
Patient Relations	Patient requesting to file a complaint.	<i>patientrelations@metrohealth.org</i>
Public Safety	An immediate threat of harm to an employee, patient, or visitor.	<i>216-778-3333</i>

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Closing Thoughts

Thank you for your interest in our Code, *This Is Who We Are: Our Culture of Ethics*. Please use it as a resource for you when you have questions or are faced with difficult ethical or compliance decisions.

We each represent MetroHealth to our patients and within our community. Patients 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 contact me or a member of the Ethics and Compliance team.

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.

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