The University of Missouri System first implemented a third-party-hosted hotline for reporting financial fraud in December 2007, further expanding it to include additional reporting categories in January 2011. In late 2018, the hotline transitioned to an updated platform (EthicsPoint), allowing for improved intake, report categorization, and case management capabilities. The hotline was also rebranded as the ***Integrity and Accountability Hotline,*** reaffirming the University System commitment to institutional accountability, transparency, and the protection of the university community. Throughout 2019, efforts to improve visibility and awareness of the hotline were executed across the University System, and resources were committed to hire a trained investigator, in support of improved investigation quality.

Analysis and benchmarking of hotline data helps an organization gain a better understanding of its culture, effectiveness of communications with employees, investigation quality, and employee knowledge of reporting channels. This report compares data collected through the UM System hotline management platform with key data benchmarks and trends from the Navex Global database of reports and outcomes, providing context for evaluating program performance and maturation. (The benchmarks utilized in this report are based on CY2018; CY2019 data will be published in April 2020). To provide a better understanding of the University's program history and performance, we are including five years of data to illustrate trends.
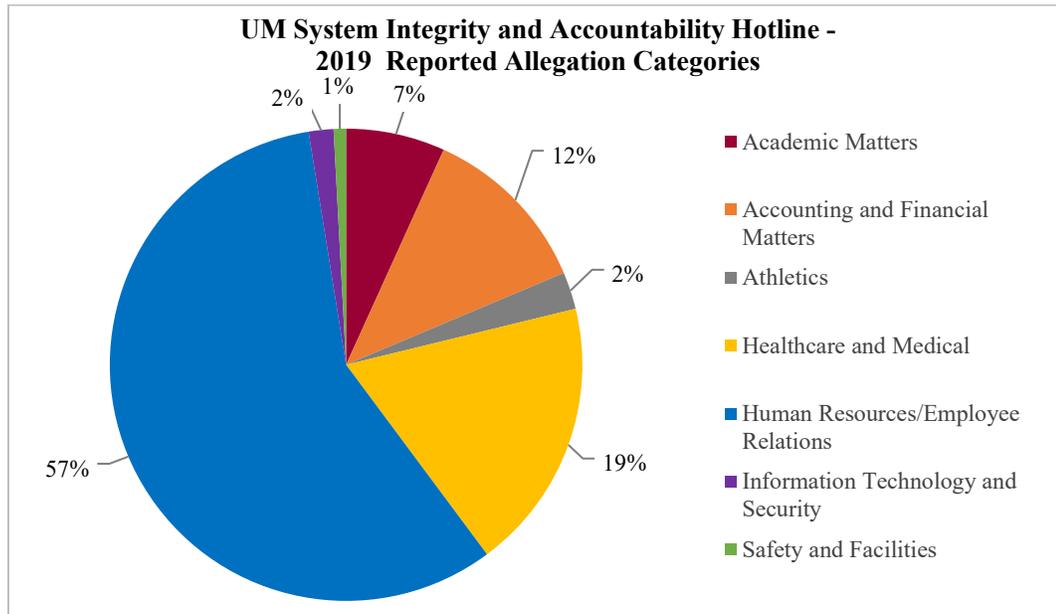
Report Volume per 100 Employees

This metric enables organizations to compare total numbers of unique reporter contacts. The benchmark for this metric has been steady at 1.4 reports per 100 employees for the past three years. MU Health Care is consistently identified as the location for at least 50% of the reports to the hotline; therefore, results were graphed to demonstrate this breakdown. All other locations include MU, Missouri S&T, UMKC, UMSL and UM System Administration.

UM System Integrity and Accountability Hotline - 2019
5-Year Trend: Report Volume per 100 Employees

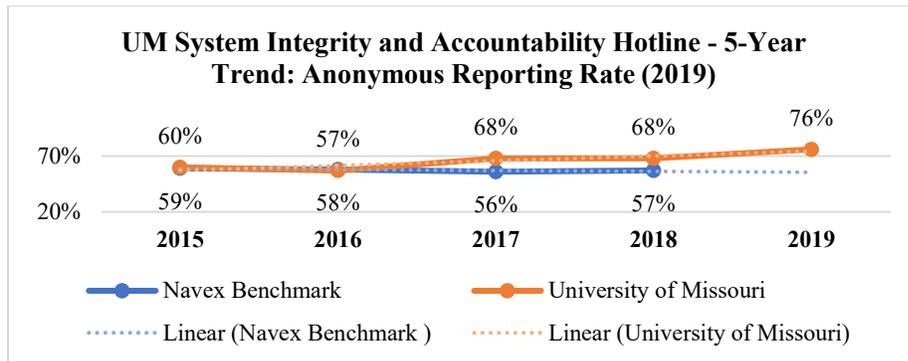| Year (n)	All Other University Locations	MU Health Care
2015 (122)	0.15	1.6
2016 (112)	0.3	1.1
2017 (102)	0.26	0.9
2018 (89)	0.2	0.8
2019 (118)	0.3	0.87

Report Allegation Categories

The kinds of reports an organization receives are an indication of areas where the organization may need to devote resources, as well as a potential measure of the effectiveness of efforts to address previously identified areas of concern. Fifty-seven percent (57%) of reports fell into the HR category; this is slightly lower than benchmark data, which fluctuates between 69 – 73%. Forty-one percent (41%) of the HR reports involved MU Health Care; 21% involved UMKC, and 10% involved MU. The highest percentage of reports in the Medical category were due to HIPAA-related issues (41%) and Patient Care/Rights issues (36%). Sixty-four percent (64%) of the Accounting and Financial reports involved Accounting/Auditing, Conflict of Interest, and Fraud/Theft/Embezzlement concerns across the University.
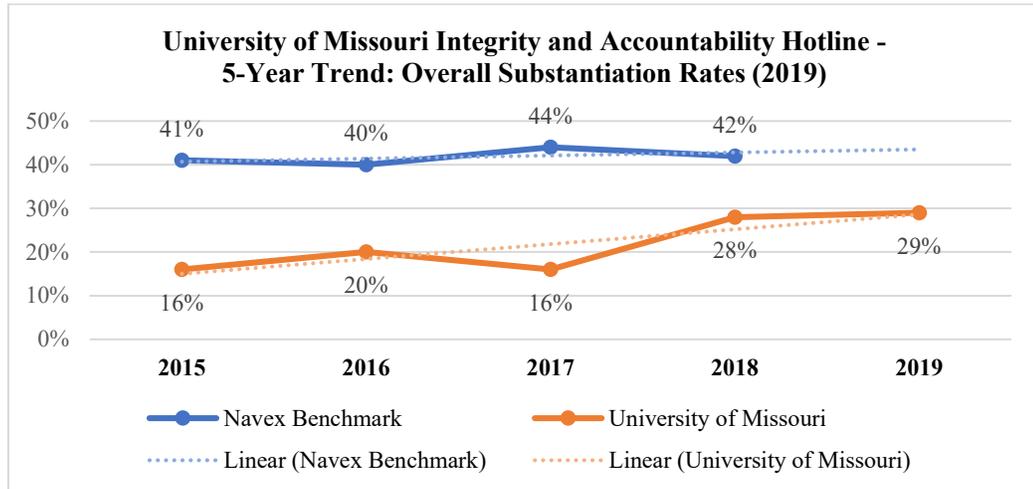

Anonymous vs. Named Reporters

Anonymous report metrics show the percentage of reporters who chose to withhold their identity. A lower rate of anonymous reporting is an indicator of trust. Although the benchmark rate has been trending lower, the University's rate of anonymous reporting is trending higher.
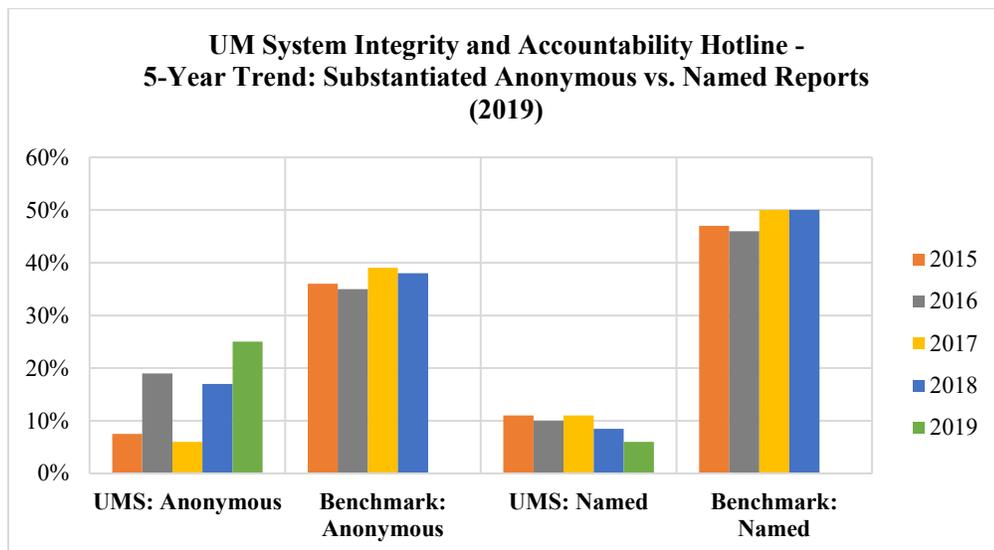
Substantiated Reports

The overall substantiation rate reflects the percentage of allegations which were determined to have at least some merit. A high substantiation rate reflects a well-informed employee base making high-quality reports, coupled with effective investigation processes. Benchmark substantiation rates are trending higher over time; University rates are lower compared to benchmarks, but also trending higher overall.
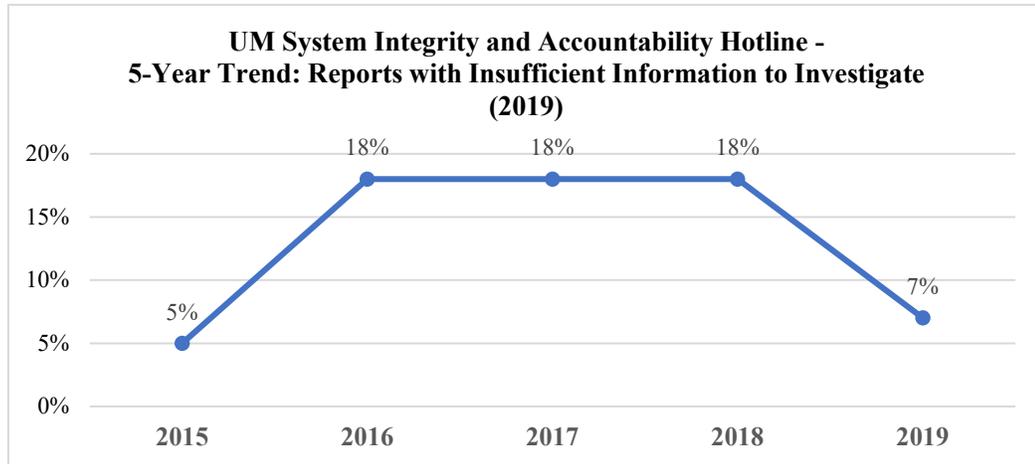

Substantiated Anonymous vs. Named Reports

There is often reluctance to take anonymous reports seriously; however, research has shown that reporters typically withhold names out of fear of retaliation or a desire to not be involved, rather than because a report is deliberately false or frivolous. Named reports allow investigators to gather additional information directly from the reporter, which can improve the effectiveness of an investigation and may result in higher substantiation rates. Benchmark substantiation rates in all categories continue to increase, indicating that organizations are receiving more high-quality and actionable reports. Of note, substantiation of anonymous reports at the UM System have risen significantly over the past two years.
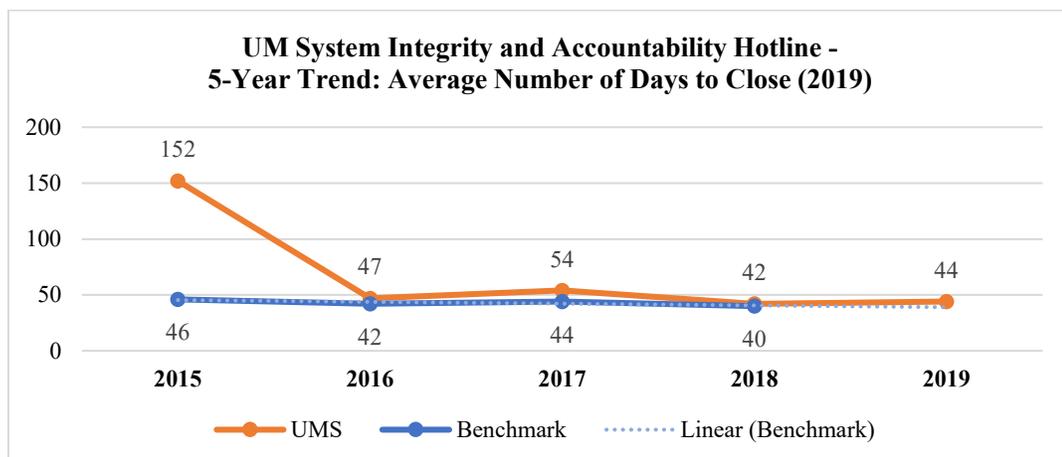
Insufficient Information

Reports that do not contain enough information to complete a credible investigation are deemed "insufficient information." There is no benchmark metric for this category of report; however, internal tracking showed a significant increase in these types of reports at the University over several years, particularly those received from anonymous reporters. Significant improvement in this metric was noted in 2019, meaning more specific and actionable information was received from reporters. We believe this may be a result of the enhanced reporting functionality of the EthicsPoint platform, and efforts to improve awareness of the hotline across the UM System community in 2019.

**UM System Integrity and Accountability Hotline -
5-Year Trend: Reports with Insufficient Information to Investigate
(2019)**

Year	2015	2016	2017	2018	2019
Value	5%	18%	18%	18%	7%

Case Closure Time

Case closure time is the number of calendar days it takes to complete an investigation and close the case. It is vital that organizations complete investigations in a timely fashion to demonstrate that concerns are important and seriously considered, and to cultivate a sense of trust with employees. Organizations that significantly or consistently exceed the best-practice average 30-day case closure time are encouraged to review case handling and investigation procedures, and consider where gaps in available resources may need to be addressed. Workplace issues that persist for 40 days or more can be damaging to morale, productivity, and organizational culture. Significant effort has been placed on completing investigations timelier at the University in the past few years.

**UM System Integrity and Accountability Hotline -
5-Year Trend: Average Number of Days to Close (2019)**

Year	2015	2016	2017	2018	2019
UMS	152	47	54	42	44
Benchmark	46	42	44	40	

Legend: ● UMS ● Benchmark ⋯ Linear (Benchmark)

Conclusions and Opportunities for Improvement

For reported concerns coming through the Hotline, the UM System has improved:
- Overall substantiation rates
- Reduction in the percentage cases with insufficient information to investigate
- Average number of days to close

These improvements are a result of focusing on the quality of investigations and increasing awareness through distribution of posters and frequent leadership communications.

The benchmarks in this report measure the effectiveness of an organization's approach to surfacing and resolving issues reported through a hotline system. The following objectives and tactics are how the UM System will continue improving how issues are surfaced and resolved through all reporting channels. This improved transparency will allow leadership to continue reinforcing an environment of integrity and accountability.

Objective	Tactics
Improve employee awareness and responsibility to report issues	- Code of Conduct/Standards - Annual education - Continued communications from leadership
Educate managers on how to respond to issues raised directly with them	Targeted education in collaboration with the UM System Hotline Investigations Committee, HR and Title IX functions
Ensure a disciplined and consistent approach to investigating, analyzing, and resolving reported issues	- Adding investigators - Informing leadership of substantiated issues
Develop a holistic view of issues across the UM System to spot areas of consistent concern	In collaboration with HR and Title IX, begin tracking reports and resolutions from all intake methods.