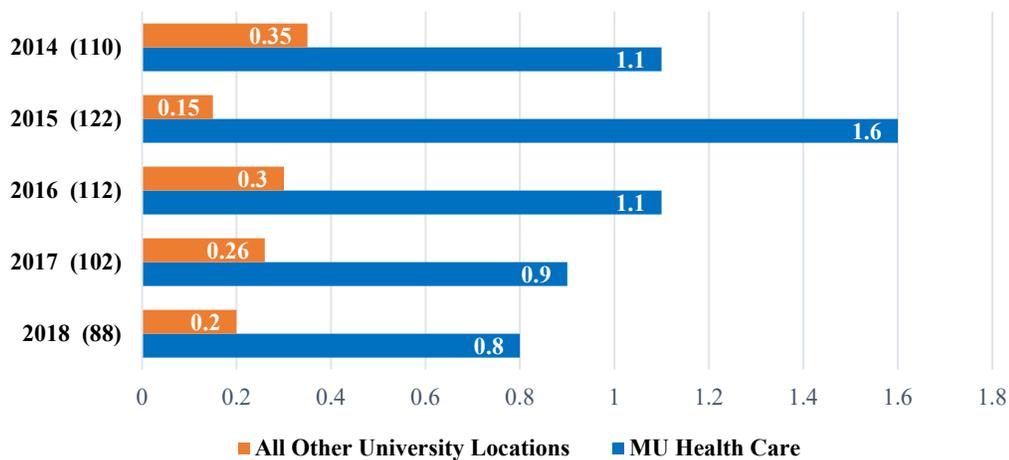The University of Missouri first implemented a hotline for reporting financial fraud in December 2007, further expanding it to include additional reporting categories in January 2011. In late August 2018, the hotline migrated to an updated platform (EthicsPoint) with our third-party vendor (Navex Global), allowing for improved intake, report categorization, and case management capabilities. At the same time the hotline was rebranded as the ***Integrity and Accountability Hotline,*** to reflect and reaffirm the University System commitment to institutional accountability, transparency, and the protection of the university community.

Good analysis and benchmarking of hotline data helps organizations 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 University hotline management system 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 CY2017; CY2018 data will be published in April 2019). In an effort to provide a better understanding of the University's program history and performance, we are including five years of data to illustrate trends.

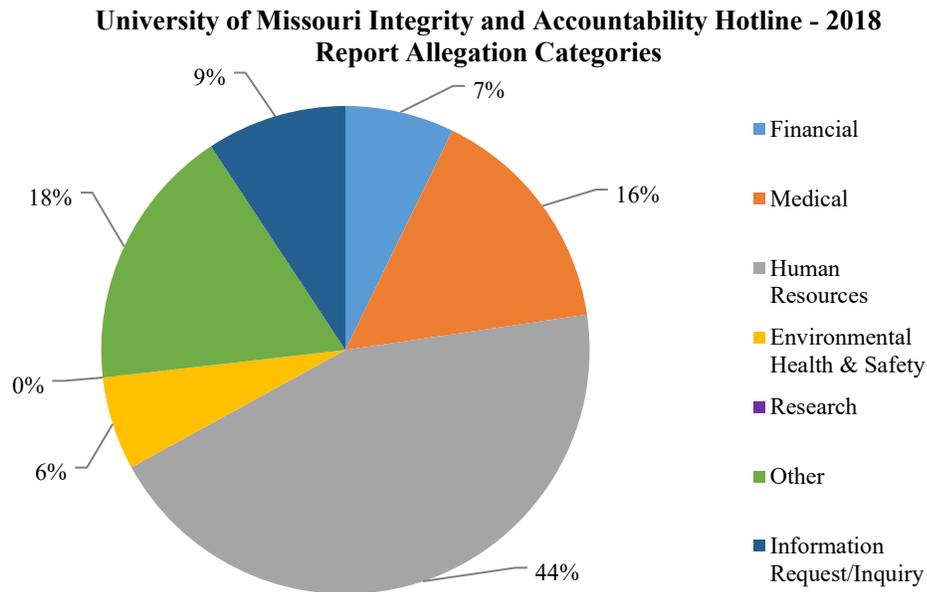**Report Volume per 100 Employees**
This metric enables organizations to compare total numbers of unique reporter contacts. The benchmark for this metric has gradually increased from 1.3 to 1.4 reports per 100 employees in the past five years, while reports to the University's hotline have decreased. Because MUHC consistently receives at least 50% of the reports to the hotline, results were graphed to demonstrate this breakdown. All other locations includes MU, Missouri S&T, UMKC, UMSL and UMS.

University of Missouri Integrity and Accountability Hotline - 2018
Report Volume per 100 Employees

Year (n)	All Other University Locations	MU Health Care
2014 (110)	0.35	1.1
2015 (122)	0.15	1.6
2016 (112)	0.3	1.1
2017 (102)	0.26	0.9
2018 (88)	0.2	0.8

■ All Other University Locations   ■ MU Health Care
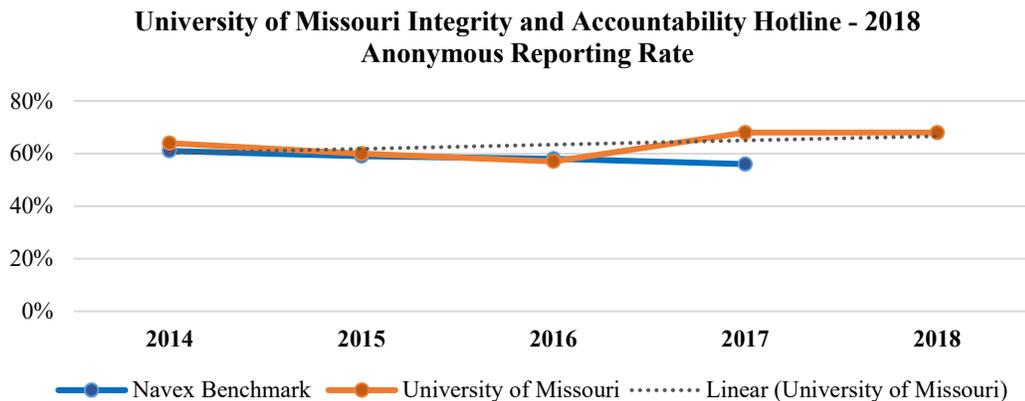
February 7, 2019

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. The majority of all reports fell into the HR category; this is consistent with benchmark data, which fluctuates between 69 – 79%. Sixty-two percent (62%) of the reports in the HR category were concerned with issues at MU and MUHC. The highest percentage of reports in the Medical category were due to HIPAA-related issues, which represent 78% of reports in that category. Seventy-six percent (76%) of the reports in the Other category were identified as patient-related concerns at MUHC.

University of Missouri Integrity and Accountability Hotline - 2018
Report Allegation Categories

Legend:
- Financial
- Medical
- Human Resources
- Environmental Health & Safety
- Research
- Other
- Information Request/Inquiry

Percentages shown: 7%, 16%, 44%, 6%, 0%, 18%, 9%
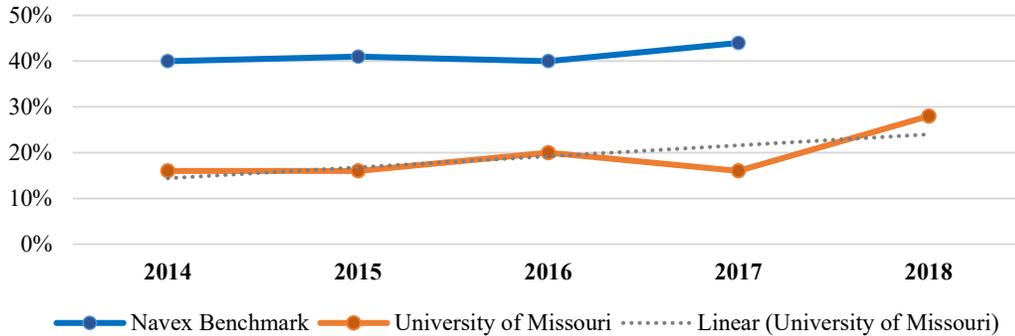
Anonymous vs. Named Reporters

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 has been trending higher.

University of Missouri Integrity and Accountability Hotline - 2018
Anonymous Reporting Rate

Legend: Navex Benchmark — University of Missouri — Linear (University of Missouri)

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Substantiated Reports

The overall substantiation rate reflects the rate 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 higher and have increased gradually over time; University rates are lower but also trending higher overall.

University of Missouri Integrity and Accountability Hotline - 2018
Overall Substantiation Rate


Substantiated Anonymous vs. Named Reports

There is sometimes a reluctance to take anonymous reports seriously; however, research has shown that names are typically withheld out of fear or 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. Of note, the benchmark substantiation of anonymous reports increased four percentage points in 2017, indicating the value of these reports and the need for organizations to take them seriously.

University of Missouri Integrity and Accountability Hotline - 2018
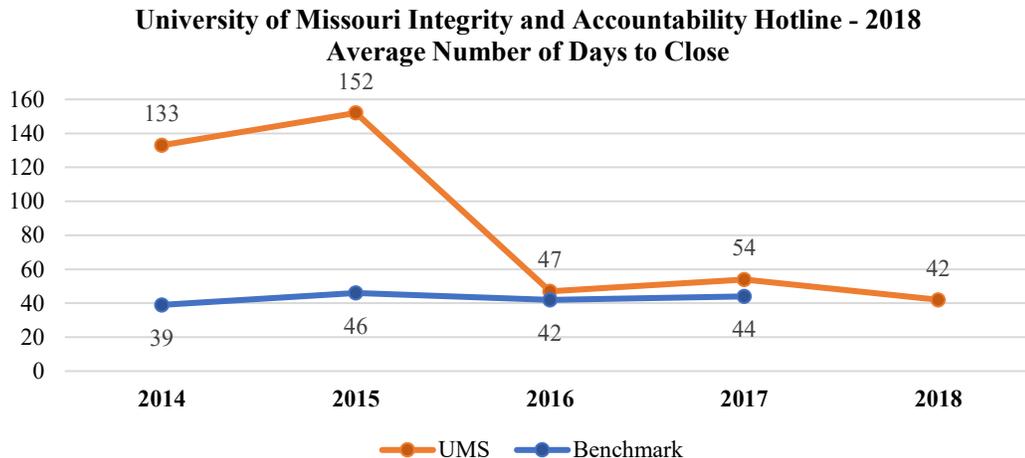**Substantiated Anonymous vs. Named Reports**
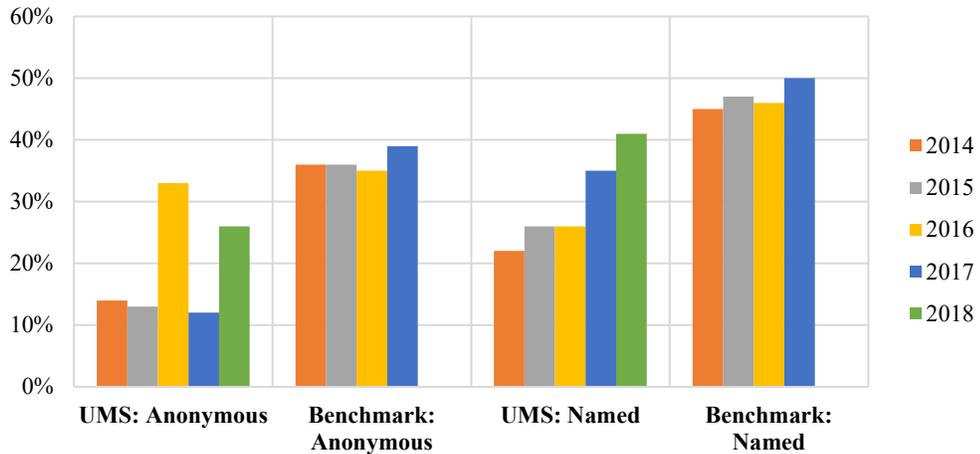
Insufficient Information

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 illustrates a significant increase in these types of reports at the University in the past three years, the vast majority being received from anonymous reporters. The EthicsPoint platform and functionality supports improved intake and encourages greater reporter engagement, which we hope will result in more specific and actionable information from all reporters.

University of Missouri Integrity and Accountability Hotline - 2018
Reports with Insufficient Information to Investigate
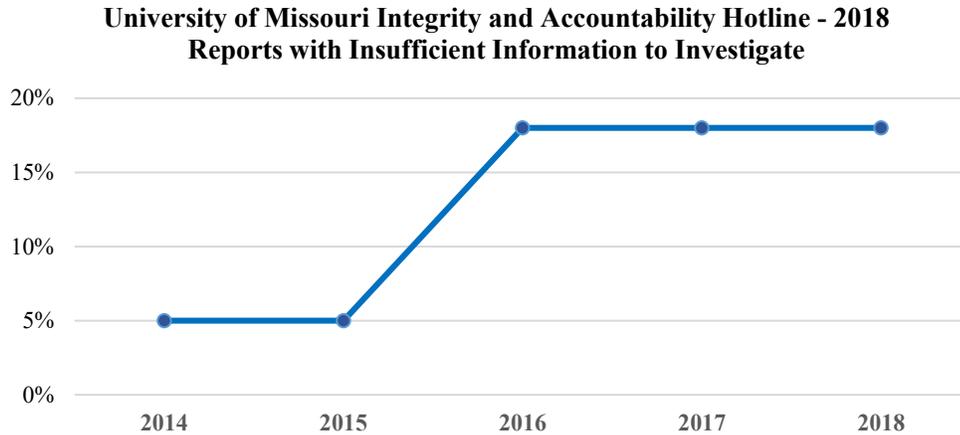
Case Closure Time

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 an average, best-practice 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 more timely in the past few years.

University of Missouri Integrity and Accountability Hotline - 2018
Average Number of Days to Close

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Conclusions and Opportunities for Improvement

Comparing data year to year helps organizations get a broad perspective on how performance matches industry norms, and what areas or issues may need more attention and resources. This report reflects only the reports received via the University's hotline, thus providing only limited insight into potential organizational issues.

Navex data indicates that organizations utilizing a centralized incident management system to track and manage reports received across all reporting channels (e.g. walk-in and open door reports, manager submissions, letters, direct email) capture 64% more reports than organizations that track hotline-specific reports only. Tracking reports from all intake methods provides organizations with the opportunity to spot trends proactively, improves visibility and insight into issues and risks, and contributes to a holistic view of issues across the organization. The EthicsPoint platform can be utilized in this manner, capturing reports from different teams and functions in separate, secure tiers, then utilizing high-level reporting across functional groups to gain a more holistic view of issues across the organization. The University plans leveraging EthicsPoint functionality to obtain a broader view and understanding of the challenges facing the organization.

Organizations performing below benchmarks are encouraged to take steps to improve employee awareness and responsibility to report issues, promote reporting channels, educate managers on how to respond to issues raised directly with them, and commit resources and tools that ensure a disciplined and consistent approach to investigating, analyzing and resolving reported issues. A promotional campaign is underway at the University to increase awareness of the hotline across the organization, which may serve to increase overall reporting volume. Despite lower report volumes in 2018, however, the complexity of reported issues is outpacing the resources and skills available to conduct thorough investigations. The investigative process would benefit from additional resources, training, and/or skill sets to ensure that hotline investigations are completed in a timely and comprehensive manner, therefore strengthening employee confidence that their concerns are being taken seriously and are resolved appropriately. This will be addressed as part of the system-wide compliance program. This program will be part of the office of Ethics, Compliance and Audit Services.

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