University of Missouri System Reporting Hotlines
Annual Report 2020

The University of Missouri System first implemented a third-party-hosted hotline for reporting financial fraud in December 2007, expanding it to include additional reporting categories in support of healthcare compliance requirements in January 2011. In late 2018, the hotline was rebranded as the ***Integrity and Accountability Hotline,*** reaffirming the University System commitment to institutional accountability, transparency, and the protection of the university community. A separate ***Bias Reporting Hotline*** was launched in August 2020 at Mizzou and the health system, then expanded to all university locations as of early December.

Although the Integrity and Accountability Hotline includes a bias reporting category for allegations of discrimination, exclusion, harassment, bullying, retaliation and retribution, the Bias Hotline was established to increase institutional awareness for reporting and tracking these issues specifically. Bias-related reports received through either System hotline are managed by the same process. In addition to these System hotlines, individuals may report bias and other various concerns to direct supervisors, Human Resources offices, Police/Security services, hospital compliance, and Equity/OCR/Title IX offices.
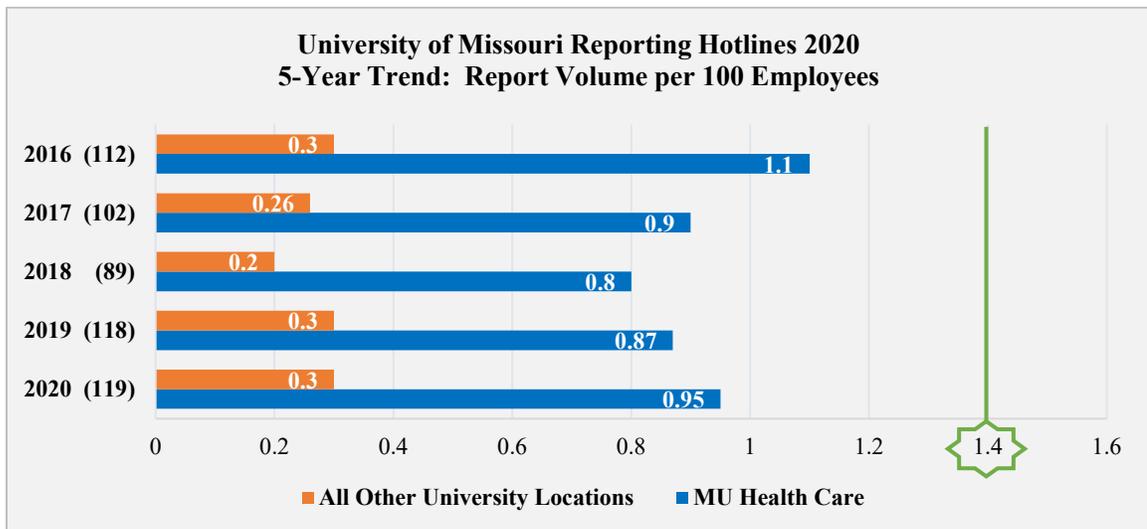
This annual report incorporates information only from the UM System hotlines, as well as mail/email reports that were received by System administration. In CY20, the Integrity and Accountability Hotline received a total of 101 reports (7 bias reports), and the Bias Reporting Hotline received 18 reports. Of these 119 reports, eighty-four (84) reports were received via the web, 31 via phone, and 4 via mail/email. As of 12/31/20, 101 reports across both lines have been resolved/closed, and investigation outcomes are still pending for 18 reports.

Analysis and benchmarking of hotline data helps an organization gain a better understanding of its culture, the effectiveness of communications with employees, investigation quality, and employee knowledge of reporting channels. This report compares data collected through the UM System case 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 most recent benchmarks available are for CY19; CY20 data will be published by Navex in April 2021). To provide a better understanding of University program history and performance, we have included five years of data to illustrate trends.

<u>Report Volume per 100 Employees</u>
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 four 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.
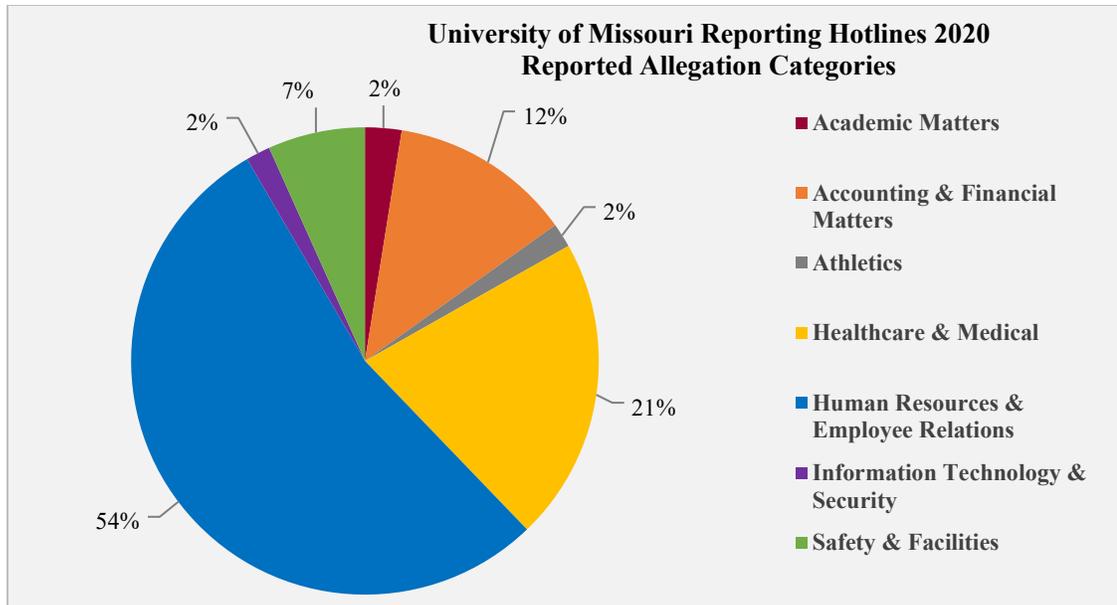
<div align="right">February 4, 2021</div>

University of Missouri Reporting Hotlines 2020
5-Year Trend: Report Volume per 100 Employees

Year	All Other University Locations	MU Health Care
2016 (112)	0.3	1.1
2017 (102)	0.26	0.9
2018 (89)	0.2	0.8
2019 (118)	0.3	0.87
2020 (119)	0.3	0.95

■ All Other University Locations ■ MU Health Care

## Report Allegation Categories

The kinds of reports an organization receives are an indication of where the organization may need to devote resources, and can provide a potential measure of the effectiveness of efforts directed towards previously identified areas of concern. The top three reporting categories in 2020 were Human Resources and Employee Relations (HR), which includes bias incidents; Healthcare and Medical; and Accounting and Financial Matters.

Forty-five percent (45%) of the HR reports involved MU Health Care, followed by 28% at MU, and 11% at UMSL. Overall, 30% of reported HR matters were substantiated, and 23% were pending resolution at year end. The highest percentage of reports in the Healthcare and Medical category were attributed to HIPAA-related issues (44%), followed by Patient Care/Patient Rights concerns (24%); 20% of reports in the Healthcare category were substantiated, and no cases were pending at year end. Thirty-three percent (33%) of reports in Accounting/Finance were substantiated, with 7% pending resolution at year end.

**University of Missouri Reporting Hotlines 2020
Reported Allegation Categories**

■	Academic Matters
■	Accounting & Financial Matters
■	Athletics
■	Healthcare & Medical
■	Human Resources & Employee Relations
■	Information Technology & Security
■	Safety & Facilities

Anonymous vs. Named Reporters

Anonymous report metrics reflect the percentage of reporters who chose to withhold their identity. A lower rate of anonymous reporting is typically considered a positive indicator of trust in the institution and hotline investigation processes.

**University of Missouri Reporting Hotlines 2020
5-Year Trend: Anonymous Reporting Rate**
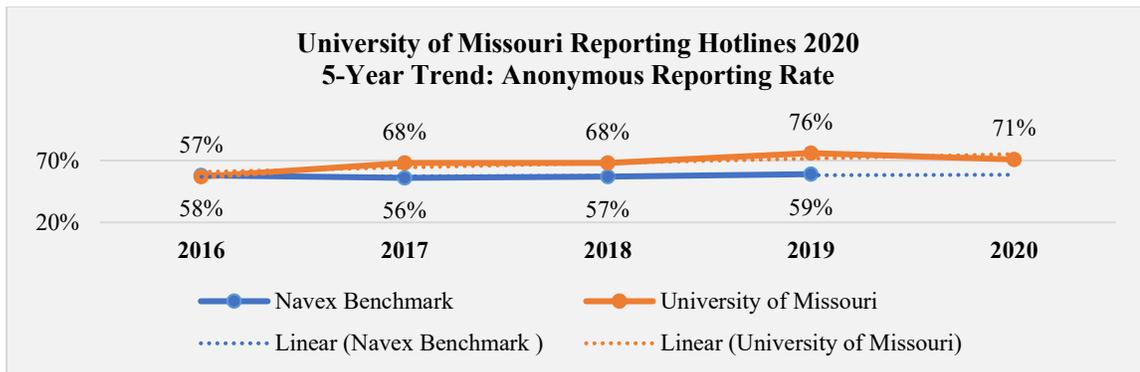
Substantiated Reports

The overall substantiation rate reflects the percentage of allegations which were investigated and proven to be, at least in part, factual as reported. A high substantiation rate reflects a well-informed employee base making high-quality reports, coupled with effective investigation processes. Benchmark substantiation rates have been relatively steady over time. University substantiation rates, though below benchmarks, are trending consistently higher in recent years.

University of Missouri Reporting Hotlines 2020
5-Year Trend: Overall Substantiation Rate
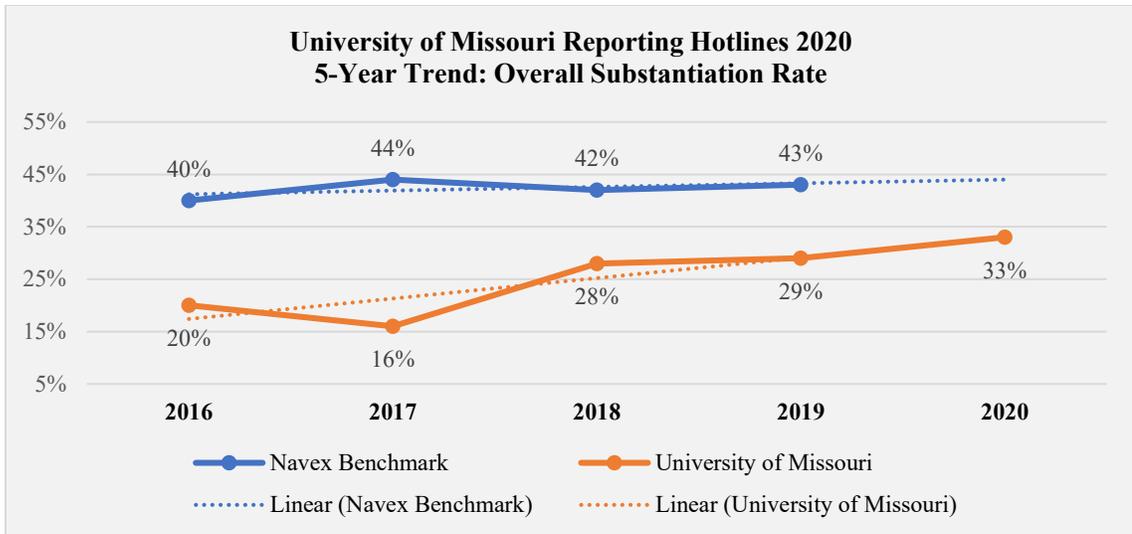
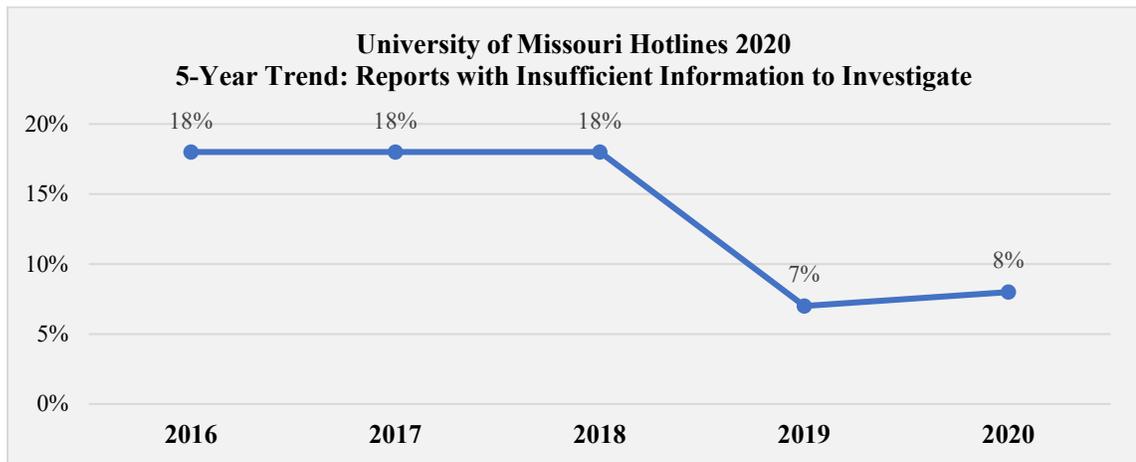## Substantiated Anonymous vs. Named Reports

There is often reluctance to take anonymous reports seriously; however, anonymous reporters can provide valuable and important insights into obscure or previously unknown legal, regulatory and compliance issues in an organization. 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. We have also been successful in utilizing a "chat" tool within the EthicsPoint case management platform, which allows investigators to communicate with anonymous reporters to gather additional important details while allowing those reporters to maintain their anonymity. Although the University lags well behind benchmarks in this area, our ability to obtain more actionable information through the chat tool, as well as having a trained investigator on the team, is helping us improve substantiation rates, especially with reports filed anonymously.

University of Missouri Reporting Hotlines 2020
5-Year Trend: Substantiated, Anonymous vs. Named Reports
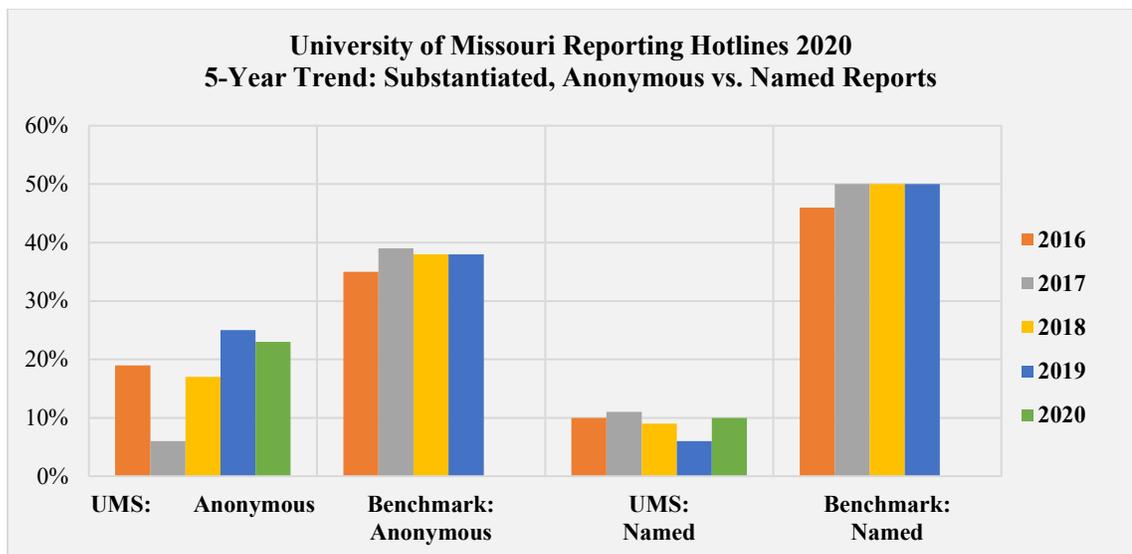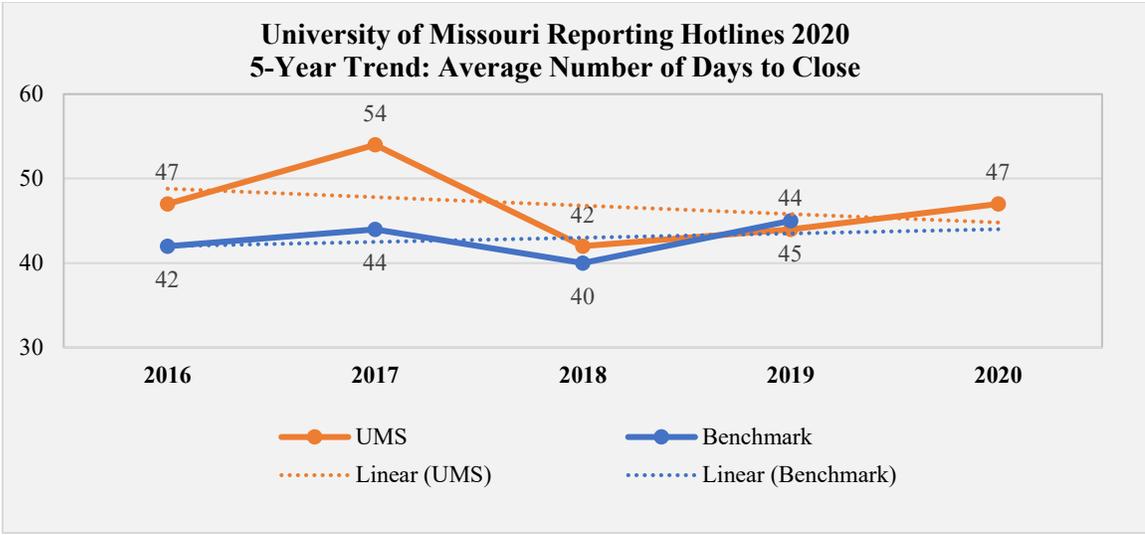
Insufficient Information

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 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 has been noted since 2018, meaning more specific and actionable information is being received from reporters. Similar to the improvements noted in substantiation rates, we believe the enhanced reporting and communication functionality of the EthicsPoint platform and the addition of a trained investigator to the team has contributed to progress with this metric.

University of Missouri Hotlines 2020
5-Year Trend: Reports with Insufficient Information to Investigate

Year	2016	2017	2018	2019	2020
Percent	18%	18%	18%	7%	8%

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. Often, as employee trust increases, organizations may notice more complex matters are reported which require the commitment of additional time and resources to some investigations. Our goal is to consider each report and allegation individually, to devote the appropriate resources necessary to conduct a thorough, high-quality investigation, and to reach resolution on reported matters as timely as possible.

University of Missouri Reporting Hotlines 2020
5-Year Trend: Average Number of Days to Close

	2016	2017	2018	2019	2020
UMS	47	54	42	44	47
Benchmark	42	44	40	45	

Legend: UMS, Benchmark, Linear (UMS), Linear (Benchmark)

Conclusions and Opportunities for Improvement

2020 Hotline Highlights:
- Continuing commitment to improve the quality of investigations, resulting in consistent progress in overall and anonymously reported substantiation rates
- Effective use of platform tools to improve reporter engagement to reduce the number of cases with insufficient information to investigate
- A slight increase in average number of days to close cases

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 mandatory compliance education - Continued communications from leadership
Educate managers on how to respond to issues raised directly with them	- Annual mandatory compliance training - 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	- Add more investigators - Annual report to leaders of substantiated issues, concerns that are not necessarily policy or regulatory violations, and trends across time to supplement their understanding of concerns across their organization.