	Shasta County Health and Human Services Agency Managed Care, Compliance & Quality Management
	Compliance Reporting & Investigation Policy

1.0 Persons/Programs Affected *(Check all that apply)*

☒ All Staff	☐ All Managers	☐ All Supervisors	

*Each branch to have unique Persons/Programs Affected
*All employees include all employees--full-time, part-time and extra-help.

2.0 Definitions

Compliance Officer means the person designated by the Mental Health Director and is delegated authority for the implementation, administration, and oversight of the Compliance Program. The Compliance Officer is delegated authority for development and day-to-day operations of the Compliance Program.

Compliance Program means the internal policies, procedures and processes designed by the Shasta County Health and Human Services Agency (HHSA) to ensure federal, state and local rules, laws and regulations are met. The Compliance Program is designed to prevent and detect violations of any statute, regulation or guideline applicable to federal health care programs in the conduct of operations by employees and other covered entities/individuals.

3.0 Policy

The Compliance Officer shall conduct a prompt and confidential investigation of questionable practices. Each matter will be investigated separately.

4.0 Procedure

Reporting

Anyone can report a violation of the Compliance Program. Reporting can be made in any of the following ways:

Confidential and Anonymous Compliance Disclosure Line: 1-866-229-8050

Compliance Officer
Shasta County Health and Human Services Agency, Business and Support Services
1810 Market St.
Redding, CA 96001
(530) 245-6750

Email:
mhcompofcr@co.shasta.ca.us

Website Address:
http://www.co.shasta.ca.us/html/Mental_Health/About%20Us/About%20Us.htm

Reports may be made anonymously. The Compliance Officer shall neither be required or compelled to disclose the name of the reporting individual, if known, unless required by law or permitted by the reporting party.

Information reported to the Compliance Officer shall be maintained in a confidential manner and shall not be disclosed, except if required during the course of an investigation or as required by law.

Investigation

Upon receipt of any oral, written, or electronic report of a violation of the Compliance Program or any questionable practice, the Compliance Officer, or designee, shall act promptly to conduct a confidential investigation. In addition to the reported information, the Compliance Officer may obtain further information necessary to corroborate or dispute the report.

In conducting the investigation, the Compliance Officer (or designee) shall: gather relevant documents and/or facts; interview reviewers, employees, physicians and staff who may be able to provide information; review medical records and other relevant reports; involve individuals or committees to assist in the investigation, if needed. The Compliance Officer (or designee) shall document the investigation in an objective manner.

Depending on the nature of the initial report, the Compliance Officer may choose to consult County Counsel, who may conduct the investigation.

The Compliance Officer shall report the result of the investigation to the Compliance Committee. If the reporting party is known, the Compliance Officer shall report the result of the investigation to the reporting party.

The Compliance Officer may, depending on the results of the investigation, advise the Clinical Division Chief of the impacted division, of the results. The Clinical Division Chief may aid the Compliance Officer in implementing a plan of correction. The Compliance Officer shall monitor the corrective action plan.

5.0 Attachments

N/A

6.0 Revision History

Date	No.	Action:
05/27/2014	2014-13	Adopted

7.0. Other Agency Involvement

N/A

8.0 Authorization/Signatures

The above policy and procedure has been reviewed and is authorized for immediate implementation:

Donnell Ewert, MPH, Director — Date: 5/30/14

Micki Mills, Program Manager, Business & Support Services
Compliance Officer
Managed Care Compliance Program — Date: 5/29/2014