



DEPARTMENT OF MENTAL HEALTH POLICY/PROCEDURE

SUBJECT COMPLIANCE PROGRAM COMMUNICATION	POLICY NO. 100.4	EFFECTIVE DATE 01/15/04	PAGE 1 of 3
APPROVED BY:  <div style="text-align: right;">Director</div>	SUPERSEDES 100.4 04/01/02	ORIGINAL ISSUE DATE 04/01/02	DISTRIBUTION LEVEL(S) 1

PURPOSE

- 1.1 To describe particular means, in addition to the traditional and customary chain of command, by which Department of Mental Health (DMH) employees or other stakeholders may express concerns or report perceived violations of the DMH Compliance Program to the management of DMH.

DEFINITION

- 2.1 The Compliance Program outlines the Department's intent to ensure proper and professional behavior in order to protect and promote organization-wide integrity. The Compliance Program asserts the Department's commitment to foster the highest quality of service delivery and to comply with all laws and regulations governing the delivery of and reimbursement for mental health services.

POLICY

- 3.1 DMH will uphold the highest ethical standards and comply with all rules, regulations, codes, and policies governing the provision of and reimbursement for mental health services provided to consumers by or on behalf of the County of Los Angeles.
- 3.2 To support ethical behavior and legal/regulatory compliance, DMH has established the following mechanisms for use by DMH employees or other stakeholders to raise questions or report concerns or perceived violations, as follows:
 - 3.2.1 Contact the Compliance Operations Committee Chairperson at 213-738-2881 or by e-mail at compliance@dmh.co.la.ca.us for concerns or questions regarding interpretation of the Compliance Program and/or Departmental policies, procedures or practice; or
 - 3.2.2 Contact the County of Los Angeles Fraud Telephone Hotline at 1-800-544-6861 or by e-mail at fraud@auditor.co.la.ca.us to report perceived ethical or legal violations of the Compliance Program.
- 3.3 Most questions or concerns can be resolved promptly on a division/bureau/organizational unit level. This policy does not replace the traditional chain of command mechanism of



DEPARTMENT OF MENTAL HEALTH POLICY/PROCEDURE

SUBJECT: COMPLIANCE PROGRAM COMMUNICATION	POLICY NO. 100.4	EFFECTIVE DATE 01/15/04	PAGE 2 of 3
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communication and problem resolution. Rather, it is intended to provide additional paths that may be utilized by employees or other stakeholders for clarification of Departmental policies, mandates and standards or for the reporting of perceived ethical or legal violations associated with the Compliance Program.

3.4 In accordance with the Code of the County of Los Angeles, Title 5, Personnel, Chapter 5.02, General Regulations:

“ Retaliation for Reporting Fraud, Waste or Misuse of County Resources [is] Prohibited

3.4.1 A No officer or employee of the County of Los Angeles shall use or threaten to use any official authority or influence to restrain or prevent any other person, acting in good faith and upon reasonable belief, from reporting or otherwise bringing to the attention of the County Auditor-Controller or other appropriate agency, office or department of the County of Los Angeles any information which, if true, would constitute: a work related violation by a County officer or employee of any law or regulation; gross waste of County funds; gross abuse of authority; a specific and substantial danger to public health or safety due to an act or omission of a County official or employee; use of County office or position or of County resources for personal gain; or a conflict of interest of a County officer or employee.

3.4.2 B No officer or employee of the County of Los Angeles shall use or threaten to use any official authority or influence to effect any action as a reprisal against a County officer or employee who reports or otherwise brings to the attention of the Auditor-Controller or other appropriate agency, office or department of the County of Los Angeles any information regarding subjects described in subsection A of this section.

3.4.3 C Any person who believes he/she has been subjected to any action prohibited in subsections A or B of this section may file a complaint with the director of personnel. The director shall investigate the complaint and thereafter prepare a report thereon which shall be forwarded to the Board of Supervisors.

3.4.4 D Any officer or employee of the County of Los Angeles who knowingly engages in conduct prohibited by this section shall be disciplined, including but not limited to discharge, in accordance with the personnel rules and regulations of the County of Los Angeles. (Ord. 88-0162 § 1, 1988)”

PROCEDURE



DEPARTMENT OF MENTAL HEALTH POLICY/PROCEDURE

SUBJECT: COMPLIANCE PROGRAM COMMUNICATION	POLICY NO. 100.4	EFFECTIVE DATE 01/15/04	PAGE 3 of 3
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- 4.1 DMH employees or other stakeholders may informally contact the Compliance Operations Committee Chairperson regarding interpretations of Departmental policies, procedures or practice by telephoning the Bureau of Standards, Practice and Conduct at 213-738-2881.
 - 4.1.1 At the request of the employee or other stakeholder, this communication will be kept confidential to the extent practical and consistent with law or regulation.

- 4.2 DMH employees or other stakeholders may formally contact the Compliance Operations Committee Chairperson regarding interpretation of Departmental policies, procedures or practice by sending a written request to:

Department of Mental Health
 Compliance Operations Committee Chairperson
 550 S. Vermont Avenue, 12th Floor
 Los Angeles, CA 90020

 - 4.2.1 DMH employees or other stakeholders wishing to formally contact the Compliance Operations Committee Chairperson are encouraged to use the Compliance Operations Committee Contact Form (Attachment I).
 - 4.2.2 Responses to Compliance Operations Committee queries will be forwarded to the sender in accordance with directions listed on the Compliance Operations Committee Contact Form.

- 4.3 DMH employees or other stakeholders may contact the County of Los Angeles Fraud Telephone Hotline for reporting perceived ethical or legal violations of the Compliance Program by calling 1-800-544-6861.
 - 4.3.1 Callers are not required to reveal their name.
 - 4.3.2 Every attempt will be made to ensure a caller's confidentiality although this cannot be guaranteed.

- REFERENCE** Department of Mental Health Compliance Program

- AUTHORITY** Department of Mental Health Policy
 Los Angeles County Code, Title 5 Personnel, Chapter 5.02

- ATTACHMENT** Attachment I Compliance Operations Committee Contact Form

- REVIEW DATE**

This policy shall be reviewed on or before December 15, 2007.

