

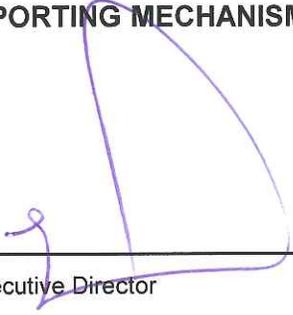
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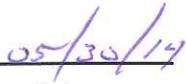
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Chapter: **DIRECTLY-OPERATED PROGRAM MANAGEMENT**  
Title: **INTERNAL REPORTING MECHANISM**

Prior Approval Date: 12/6/07  
Current Approval Date: 5/30/14

Approved by: \_\_\_\_\_

  
Executive Director

  
Date

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**I. ABSTRACT**

This policy establishes the standards and procedures of the Macomb County Community Mental Health (MCCMH) internal reporting mechanism for violations of the law, the MCCMH Corporate Compliance Program, or the Corporate Compliance Code of Ethics.

**II. APPLICATION**

This policy shall apply to the MCCMH administrative offices and to all directly-operated network providers of the MCCMH Board.

**III. POLICY**

It is the policy of the MCCMH Board to encourage its employees, individual contractors, and other interested parties to report violations of or concerns about the Corporate Compliance policy or the Code of Ethics, either anonymously or in confidence, to the MCCMH Compliance Officer.

**IV. DEFINITIONS**

A. None.

## V. STANDARDS

- A. MCCMH reporting mechanisms shall provide avenues for employees, individual contractors, or interested parties to report suspected criminal activity and illegal or unethical conduct occurring within the Board's direct-operated or contracted provider organizations.
- B. Individuals who report problems or concerns in good faith will be protected from any form of retaliation or retribution.
- C. All those who are employed in the Compliance Officer's internal reporting mechanisms are expected to act with the utmost discretion and integrity in assuring that information received is acted upon in a reasonable and proper manner.
- D. The Compliance Officer will be responsible for the operation of the Board's internal reporting mechanisms.

## VI. PROCEDURES

- A. The Board shall establish and maintain the following internal reporting mechanisms for employees, individual contractors, or other parties to easily and confidentially or anonymously report violations or suspected violations of the MCCMH Corporate Compliance Plan and the Code of Ethics in good faith:
  - 1. By telephone:
    - a. Keith Hoffman: (586) 469-3715
    - b. Amy Bischof: (586) 469-5183
    - c. Ray Rais: 9586) 466-7913
  - 2. By e-mail:
    - a. Keith Hoffman: Keith.Hoffman@mccmh.net
    - b. Amy Bischof: Amy.Bischof@mccmh.net
    - c. Ray.Rais: Ray.Rais@mccmh.net and
  - 3. By Inter Office Mail
  - 4. By U.S. Mail
- B. Individuals may also report via routine County inter-office mail.
- C. The Compliance Officer shall ensure that all reports to the Compliance Office are addressed within two (2) weeks in an appropriate manner, as well as in accordance with Board policies and procedures.
- D. The Compliance Officer shall ensure that all of the internal reporting mechanisms are in place and functioning.

- E. No attempt will be made to identify a reporting party who requests anonymity. Whenever a reporting parties discloses his/her identity, it will be held in confidence to the fullest extent practical or allowed by law.
- F. The Compliance Officer, or designee, shall document, log, sequentially number, and securely maintain all reports.
- G. The Compliance Officer shall ensure that appropriate investigation and follow-up occurs in a timely manner.
- H. The Compliance Officer shall review the reports and conduct investigations in the event that a report cannot be resolved during the initial contact to the Compliance Office. In the event that a reporting party is asked to call back, an identification number will be issued to the individual to protect his/her identity.
- I. The Compliance Officer, or designee, shall securely maintain records of investigations and follow-up activities.

## **VII. REFERENCES / LEGAL AUTHORITY**

- A. Pub. L. 104-191
- B. MCCMH MCO Policy 1-001 "Overview: Compliance Program / Code of Ethics"

## **VIII. EXHIBITS**

- A. None.