



# COMMUNITY MENTAL HEALTH

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## Compliance Alert

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Date: September 14, 2006

To: All CMH Staff (via e-mail)  
All CMH Contract Providers (via U.S. Mail)

From: Jim Losey, Corporate Compliance Officer

Re: **Sign-in/Sign-out Logs and Confidentiality Agreements for  
Pharmaceutical Company Sales Representatives**

Macomb County Community Mental Health policy MCO 3-005 specifically requires sign-in/sign-out logs for pharmaceutical company sales representatives visiting MCCMH provider sites. Effective June 6, 2006, **all sites** have been required to maintain sign-in/sign-out logs for pharmaceutical representative visits. Compliance with this Policy is **mandatory**.

Additionally, ALL pharmaceutical representatives visiting MCCMH sites **must** sign a Confidentiality Agreement before being allowed access to MCCMH sites. A copy of the Confidentiality Agreement is attached as an Exhibit to MCO Policy 3-005.

The dissemination, implementation, and compliance/adherence monitoring of the provisions of MCO Policy 3-005 are the responsibility of the MCCMH Program Supervisors.

Additional monitoring of adherence to this Policy will be conducted on an informal (spot-checks) as well as formal (site audits) basis. Non-compliance with the policy may result in sanctions, including disciplinary action, contract suspension or, for sales representatives, temporary or permanent revocation of admission to one or more MCCMH sites.

Cc: Executive Staff



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