

MCHENRY COUNTY MENTAL HEALTH BOARD

POLICY NAME: CORPORATE WASTE, FRAUD AND ABUSE

POLICY CODE: 1.A.3

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Approved By: Scott Block (Executive Director) **Approval Date:** 04/26/2016

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POLICY:

The McHenry County Mental Health Board will operate in an ethical, legal, fair, and non-discriminatory manner in all functions utilizing evidence based practice, current technologies, and best practices; incorporating consumer and public input within an environment of continuous performance improvement.

PURPOSE:

The purpose of this policy is to ensure that the McHenry County Mental Health Board has a policy and procedures in place to report and address allegations of corporate waste, fraud and abuse, ensuring anonymity when requested. Acts of waste, fraud or abuse impact the resources of the Mental Health Board and may occur through an unintentional act or by a deliberate action. Regardless of the intent, waste, fraud and/or abuse will not be tolerated and must be reported to the appropriate leader.

DEFINITIONS:

ABUSE: The intentional, wrongful, or improper use or destruction of Mental Health Board resources, or seriously improper practice that does not involve prosecutable fraud. Abuse can include the excessive or improper use of an employee's position in a manner other than its rightful or legal use.

EXAMPLES (may include, but are not limited to):

- Failure to report damage to the Mental Health Board related to equipment or property.
- The use of Mental Health Board time for personal business.
- Abusing the system of employee business expense reimbursement.

FRAUD: A dishonest and deliberate course of action that results in the obtaining of money, property or an advantage to which the Mental Health Board employee committing the action would not normally be entitled. Intentional misleading or deceitful conduct that deprives the Mental Health Board of its resources or rights.

EXAMPLES (may include, but are not limited to):

- Falsifying of financial records to cover up theft.
- Theft or misuse of Mental Health Board money, equipment, supplies and/or other materials.
- Intentionally misrepresenting the costs of goods and services.
- Falsifying payroll information.
- Use of Mental Health Board equipment or property for non-sanctioned business.
- Submitting false requests for reimbursement or billing to other entities.
- Soliciting or accepting a bribe or kickback.

WASTE: The needless, careless, or extravagant expenditure of Mental Health Board funds, incurring of unnecessary expenses or mismanagement of Mental Health Board resources or property. Waste

does not necessarily involve private use or personal gain, but almost always signifies poor management decisions, practices or controls.

EXAMPLES:

- Purchase of unneeded supplies or equipment.
- Purchase of goods at inflated prices.
- Failure to reuse or recycle major resources or reduce waste generation

PROCEDURE:

The Mental Health Board endorses a no-reprisal approach for anyone reporting, in good faith, allegations of corporate waste, fraud or abuse. Investigations will commence within 24 hours of notification to the Compliance and Operations Manager. A Corporate Waste, Fraud or Abuse Reporting Form shall be completed within 24 hours of a verbal report.

1. The Mental Health Board will fully comply with all federal and state laws that protect an employee who discloses this information. All Employees and members of the board are responsible for reporting any observations of corporate waste, fraud or abuse.
2. Any individual or stakeholder may report an incident of corporate waste, fraud or abuse verbally, electronically or in writing. The Corporate Waste, Fraud, and Abuse Reporting Form, available on the Mental Health Board website, may be used for reporting the allegation. This form may be submitted either electronically or by hard copy to the Compliance and Operations Manager. Allegation involving the Leadership should be reported to the Executive Director or appointed designee.
3. The mechanisms for reporting anonymously include telephoning the Mental Health Board at (815) 455-2828 or by submission of a completed Corporate Waste, Fraud and Abuse Form to the Mental Health Board. For reports received anonymously, the results of the investigation may be impeded by the inability to gather additional information regarding the allegation.
4. Upon receipt of an allegation the Compliance and Operations Manager will ensure that within 24 hours the Corporate Waste Fraud and Abuse Form (Attachment A) will be completed and the investigation started in consultation with the Executive Director. An allegation involving the Executive Director will be investigated by the Compliance and Operations Manager in consultation with the Board President.
5. Upon completion of an investigation, the results will be reviewed with the Executive Director and findings will be forwarded to and reviewed by the Risk Management Committee.
6. In the event an investigation finds a Mental Health Board employee has committed an act of waste, fraud or abuse, the employee may be subject to immediate termination.
7. Board members found to have committed an act of waste, fraud or abuse will be subject to action determined by the Board with consultation from Board legal counsel.
8. Employees found to have submitted a fraudulent report may be subject to disciplinary action up to and including termination.

Related Documents:

Attachment A - Corporate Waste, Fraud, or Abuse Reporting Form

MCHENRY COUNTY MENTAL HEALTH BOARD

CORPORATE WASTE, FRAUD, OR ABUSE REPORTING FORM

DATE:

NAME OF REPORTER:

(Optional)

POSITION:

(Optional)

PHONE NUMBER OF REPORTER:

(Optional)

CONCISE DESCRIPTION OF CONCERN:

***Return completed form to the Compliance & Operations Manager**

FOR INTERNAL USE ONLY

DATE RECEIVED:

DATE EXECUTIVE DIRECTOR NOTIFIED:

ACTION TAKEN TO DETERMINE IF FORMAL INVESTIGATION IS WARRANTED:

INVESTIGATION WARRANTED? YES NO

IF YES, INVESTIGATION ASSIGNED TO:
