

**County Of San Bernardino  
Department of Behavioral Health**

**Compliance Hotline Policy**

**Effective Date**  
**Revision Date**

6/04  
6/25/07

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**Allan Rawland, Director**

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**Policy**

As stated in the Code of Conduct, it is the policy of the Department of Behavioral Health (DBH) that each employee, vendor, intern, volunteer, or contract provider has an individual responsibility for reporting any activity he or she reasonably believes is in violation of the standards set forth by applicable laws, regulations, DBH policy, and contractual stipulations.

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**Purpose**

The purpose of the Compliance Hotline is to provide an alternative mechanism for employees and contract staff to report any activity that may violate DBH Compliance Program Integrity, which is based upon state, federal, local, and contractual standards. The goal of the hotline is to present an alternative avenue of communication for identification, investigation, correction and prevention of compliance issues.

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**Reporting via  
Hotline**

If a DBH employee, vendor, intern, volunteer, or contract provider suspects that a standard has been violated, and he/she does not wish to report a compliance concern through the normal chain of command, the concern can be reported through the Compliance Hotline

- The Compliance Hotline is available 24 hours a day, seven days a week. Callers may reach a Compliance staff member, if available, during business hours; otherwise, callers may leave a message on the established voice mail messaging system.
- All calls to the Compliance Hotline are handled with confidentiality, subject to laws imposed
- Good faith reporting carries no retaliatory consequence or subjugation to adverse action.

**Note:** Although every caller has the option to remain anonymous, the Office of Compliance encourages disclosure to assist with prompt remedial action.

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# County Of San Bernardino

## Department of Behavioral Health

### Caller Information

The following information will be obtained from the voice mail system:

- Name or location
  - Service or program
  - Date of the call
  - Any relevant information concerning the allegations
  - Name of caller (unless anonymity is preferred)
  - Contact phone number for caller (unless anonymity is preferred)
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### Follow-up Investigation

Based on the information given, the Office of Compliance staff will review and determine whether further investigation is warranted. If an investigation is in order, information is collected, carefully analyzed, and recommendations are made by the Office of Compliance staff.

- Resolutions, which involve corrective action or discipline, will require the approval of the DBH Director, Chief Compliance Officer, or designee.
  - Results of the investigation, including unsubstantiated cases, will be communicated to the servicing unit via management as allowed by protection of propriety and confidentiality considerations.
  - The Office of Compliance staff will report regularly on Hotline related activity, including investigations, corrective actions, and outcomes to the Compliance Committee.
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### Reference

CFR, Title 42, volume 3; CFR 438.608  
OIG Federal Register Notice: Supplemental Compliance Program Guidance for Hospitals, Vol. 70, No. 19, dated January 31, 2005.

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