

Reports of Fraud, Waste and Abuse

Policy

It is the policy of Central Florida Behavioral Health Network, Inc. (CFBHN) to ensure prevention of fraud, waste and abuse involving employees, directors, officers and members.

Purpose

The purpose of this policy is to establish guidelines to report the detection, prevention, and reporting of fraud, waste and abuse against CFBHN.

Procedure

A. Definitions

1. Fraud: Any dishonest or deceptive act to include forgery or alteration of a document; misappropriation of funds, supplies or resources; improper handling or reporting of money or financial transactions; disclosing confidential and proprietary information to outside parties; or the destruction or intentional removal of records, fixtures or equipment.
2. Waste: The unnecessary incurring of costs as a result of inefficient practices, inappropriate use of materials, systems and/or controls.
3. Abuse: Violations and circumstances of departmental or agency regulations which impair the effective and efficient execution of operations.

B. The procedure for handling reports of Fraud, Waste and/or Abuse is documented in the Corporate Compliance Plan. This procedure includes a summary of the steps outlined in the plan.

C. A report of an alleged violation of corporate policy related to waste, fraud, abuse, or any other wrongdoing should be made to the Corporate Compliance Officer, either verbally or in writing. All employees are required to report suspected violations. Failure to report a known violation may also result in disciplinary action.

1. If, for any reason, the report to the Corporate Compliance Officer is inappropriate due to the nature of the alleged violation, the report should be made either verbally or in writing to the President/Chief Executive Officer (CEO).
2. If, for any reason, the report to the President/CEO is inappropriate due to the nature of the alleged violation, the report should be made verbally or in writing to the Chief Financial Officer (CFO).
3. If, for any reason, the report to the CFO is inappropriate due to the nature of the alleged violation, the report should be made in writing to the Chair of the Board of Directors.

D. When a violation of corporate policy related to waste, fraud, abuse, or any other wrongdoing is received by one of the aforementioned parties, an investigation is initiated by that party, or their designee, a member of the Board of Directors, or an outside party, within one (1) business day.

1. The person or persons making the report of an alleged violation may be interviewed and required to supply additional information.
2. The investigation is kept confidential as provided by law, but, as deemed necessary by the circumstances, may include other employees, local State or Federal officials, law enforcement and/or others.
3. The CFBHN President/CEO, CFO, Human Resources, and Risk Management are made aware of the report as deemed necessary. The investigation is finalized as quickly as is required by the circumstances of the case.

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- E. Fraud, waste or abuse reports may also be made to the Corporate Compliance Hotline which is managed by Intercept of Florida.
 - 1. Reports can be made to the hotline by calling 888-893-8790.
 - 2. Written reports can be faxed to the hotline using the number 239-498-3637.
 - 3. The individual who makes the report may be asked to provide contact information. If the individual requests confidentiality/anonymity, Intercept of Florida will make every effort keep this information confidential, as provided by law.

- F. Once the report is received, Intercept of Florida follows a formal process to disseminate the report to the appropriate CFBHN representative, either the President/CEO, COO or Chair of the Board of Directors.
 - 1. That CFBHN representative is responsible for following up with the individual who made the report to:
 - a. Review the steps taken to address the issue;
 - b. Provide a summary of the investigation's findings; and
 - c. If warranted, contact the appropriate authorities.
 - 2. A representative from Intercept of Florida will also follow up with the reporter of the alleged violation.

- G. Reports may also be made directly to the DCF Office of the Inspector General at 850-448-1225. Reports made to the OIG are addressed following the agency's internal policies and procedures.

- H. Inquiries concerning the investigation made by the suspected individual(s), his or her attorney or representative(s) or any other inquirer should be directed to the CFO or CFBHN legal counsel.

- I. Until the investigation is complete, management/employees are encouraged not to discuss the case facts, suspicions, or allegations with anyone outside the organization unless asked by CFBHN's legal counsel or the Finance Committee.

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