



STATE OF CONNECTICUT
Department of Mental Health & Addiction Services



Commissioner's Policy Statement and Implementing Procedures

SUBJECT:	Reporting a Compliance Concern
P & P NUMBER:	Chapter 3.9
APPROVED:	Miriam Delphin-Rittmon, Commissioner Date: 10/15/2015
EFFECTIVE DATE:	October 15, 2015 <i>Miriam Delphin-Rittmon</i>
REVISED:	11/1/2009
REFERENCES:	Agency Compliance Plan
FORMS AND ATTACHMENTS:	

STATEMENT OF PURPOSE: The purpose of this policy is to support the Agency Compliance Program and its directives.

POLICY: The DMHAS Compliance Program requires all individuals to promptly report any known or suspected violations of laws, regulations, standards, policies and procedures that apply to the DMHAS.

PROCEDURE:

When to Report:

1. If you are an employee, student or volunteer, you may contact:
 - Your immediate supervisor
 - Your immediate supervisor's supervisor (if the compliance issue relates to your immediate supervisor)
 - An appropriate manager within the operating structure of your facility
 - The CEO of your facility
 - The Facility Compliance Officer
 - The Agency Compliance Integrity Officer (ACIO) if the reporting structure above has been exhausted, is unknown to you, or when you desire anonymity

- “COMPLIANCE ALERT LINE LINK” (CALL) – this is a confidential telephone reporting system operated by the Compliance Division
- The Federal Government or the State of Connecticut. (Please note that employees are encouraged to first utilize the above- mentioned internal reporting mechanisms)

If in doubt about whether to report a concern, answer the following questions:

- Do I suspect or know illegal or improper conduct has occurred?
 - Have I talked with my supervisor, department manager or is the supervisor or manager part of the issue?
 - Do the issues or concerns remain unresolved or ignored?
 - If you answer “YES” to these questions, contact the CEO of your facility directly
 - Contact the Agency Compliance Integrity Officer Directly
 - Persons doing business with the DMHAS, patients, family members or members of the general public may contact the Compliance Alert Line link (CALL) or the Agency Compliance & Integrity Officer
 - Email Compliancealertlink.com
 - The Federal Government or the State of Connecticut
2. Administrative personnel receiving reports from employees, students or volunteers must report the information to the CEO of the appropriate facility.

A. Contacting the Agency Compliance Integrity Officer Directly:

Any individual may contact the Agency Compliance Integrity Officer (ACIO) directly. A person may or may not choose to identify him or herself. Contacting the ACIO may be done in the following ways:

1. By phone to 860-418-6800. All calls will be treated confidentially but anonymity cannot be guaranteed if calls are made from within the DMHAS telephone system. Voice mail messages are also accepted.
2. In person to the ACIO at OOC, 410 Capitol Avenue, Hartford.
3. In writing to the ACIO either through in-house mail, the US Postal Service, email or fax.
 - In- house mail address is: Agency Compliance Integrity Officer - OOC

- US Postal Service address is: The Department of Mental Health and Addiction Services, 410 Capitol Avenue, Hartford, CT 06106
Attn: Agency Compliance Integrity Officer
- Email may be addressed to carol.ferro@po.state.ct.us

B. Using the Confidential "COMPLIANCE ALERT LINE LINK":

"COMPLIANCE ALERT LINE LINK" number is 860-418-6991. Presently, all calls go to a voice mail box and are retrieved daily.

I. Confidentiality

Individuals, who report in good faith possible compliance issues, will be accorded confidentiality and/or anonymity to the extent possible under the law. The reporting individual's identity may become known during the normal course of the investigation and this possibility will be discussed with the individual by the ACIO.

II. Individual Responsibility for Compliance

The act of making a compliance report will not exempt the reporter from the consequence of their own participation in unethical or illegal conduct and does not relieve the reporter of the obligation to file reports otherwise mandated, such as incident reports required by The DMHAS. Reports that are proven with clear and convincing evidence to be made in bad faith, for example with reckless disregard or willful ignorance of the facts, will result in disciplinary action up to and including termination of the individual making such bad faith report.

III. Feedback to the Reporting Individual

The ACIO acknowledges the receipt of all reports received whenever this is possible. Phoned reports left on the ACIO's private voice mail are acknowledged if a name and number are left, email is returned, letters are acknowledged if a return name and address are known and calls to the ALERT LINE are acknowledged with a faxed or emailed response noting the receipt of the report in the ACIO's office.

Details of the progress on or resolution of investigations are generally not shared with the reporting individual, unless required by law. General activities may be shared as appropriate to assure the reporting individual that action is being taken on the issue reported.

IV. Non-Retaliation, Non-retribution for Reporting

The DMHAS recognizes that individuals may be reluctant to report actual or potential wrong doing due to possible retaliation, retribution or harassment. The DMHAS policy regarding these issues states that:

- No supervisor, manager or employee is permitted to engage in retaliation, retribution or harassment directed against any individual who reports a concern.

- The ACIO is responsible for investigating any reports of retaliation, retribution or harassment of reporters (whistle-blowers) when it involves internal investigations.