



MECKLENBURG COUNTY
Area Mental Health, Developmental Disabilities and
Substance Abuse Services
March 21, 2011

PROVIDER HOT SHEET

- ⇒ ProviderConnect will be down for maintenance **Friday, March 25th after 5 pm**. Please be sure to save all work and exit ProviderConnect before maintenance begins.

Please direct any questions or concerns to Jeremy.Pollard@mecklenburgcountync.gov.

- ⇒ Mecklenburg County Internal Audit has issued a new anti-fraud policy. This policy is established to provide increased protection to the assets and financial interests of Mecklenburg County; to provide a coordinated approach to the identification, investigation and resolution of fraudulent activities; and to increase the overall awareness of employees' responsibility to report fraud and reasonably suspected fraudulent activity to the appropriate County parties. **Mecklenburg County expects the same honesty and integrity from its consultants, temporary staff, vendors and anyone having business with Mecklenburg County.** Click [here](#) to review full policy.

- ⇒ **IRIS (Incident Response Improvement System):** Please remember that timely incident submission is an important element of your FEM score. This includes the timeliness of your initial submission, in addition to LME requests for additional information. On the **first page** of the incident report, you are required to include an email address. IRIS recognizes that address as the provider's IRIS email address. Please use the address of someone who is able to respond promptly, taking vacations and other situations into account. Providers might want to consider creating an email account that can be monitored by multiple staff. Remember: Providers typically have one business day to respond to requests for additional information, unless more time is needed for investigation. In those instances, please make arrangements directly with the Risk Manager. Questions related to IRIS should be directed to Linda Margerum at 704-336-7187 or Nancy Cody at 704-336-6027.

- ⇒ **IRIS Technical Issue:** When updating an incident report in IRIS, you must save each page changed; go to the Incident Submission tab and add brief information in the text box explaining what has been added or changed; and then click the **SUBMIT** button. If you click only the SAVE button, the LME will not receive your update. This may result in a late response.

New IRIS Practice Site address: <https://irisuat.dhhs.state.nc.us/> (This is not LIVE IRIS)

The revised Incident Response and Reporting Manual is now available on the Division website at the following address:

<http://www.ncdhhs.gov/mhddsas/statspublications/manualsforms/incidentmanual2-25-11.pdf>

CLINICAL CORNER

- ⇒ Several weeks ago, information was presented in the Hot Sheet about the forthcoming A+Kids Program, a DMA registry to monitor the prescription of antipsychotic medication for off-label indications in children. It has now been announced that the program will begin on April 12, 2011, and will be initially be targeted to children aged 12 and under; expansion to children aged 13-17 will take place later this year.

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Prescribers serving children will be receiving more information from DMA about this program, with instructions about entering monitoring information on-line. Click [here](#) to see the letter from Dr. Best, Chief Medical Officer at DMA, with specifics about the program, its purpose, and rollout to prescribers across North Carolina.

- ⇒ The Traumatic Brain Injury (TBI) training being offered by the Charlotte Rehabilitation Institute on May 23rd represents an extremely valuable resource for Mecklenburg's community of providers. TBI, on large- and small-scales, can pose significant challenges to consumers of all ages, whether as a primary or secondary diagnosis. It is important for all providers to be well-informed about TBI assessment and treatment interventions, as well as how it can exacerbate other difficulties consumers may be experiencing in the cognitive, affective, and behavioral realms. The training will also offer information to providers about resources for consumers and families who are living with the challenges posed by TBI. Click [here](#) for more information.

CONSUMER AND FAMILY ADVISORY COMMITTEE UPDATES

- ⇒ CFAC strongly encourages Providers to involve their consumers and family members to participate in the LME's Center of Excellence Review Committee and their MHDDSAS Website Review Committee described in the website below. These are great opportunities for consumers and family members to help shape assure the website is relevant to their needs, and to oversee the effectiveness of Division Contracts.

Volunteer opportunities are available at:

<http://www.ncdhhs.gov/mhddsas/consumeradvocacy/volunteer-yes.htm>

CFAC also extends the invitation again for Providers to make their consumers and family members aware of CFAC and encourage them to attend CFAC monthly meetings and consider applying for membership.

ON THE MOVE

- ⇒ Monarch would like to announce the following:
- Chris Abbey, MA, LPC is the new Clinical Program Director for Monarch's Community Support Team, Walk in Clinic, Targeted Case Management, Hospital Discharge and Transition Service, and Therapeutic Transitional Housing. Chris can be reached at Chris.Abbey@Monarchnc.org or via cell phone at 980-219-4284. Ashley Jacobs, MS remains the Operations Director over this same service array and she can be reached at Ashley.Jacobs@monarchnc.org or via her cell phone at 704-560-6662.
 - NaMetris Norman, MEd, NCC, P-LPC is the new Program Director for Monarch's Residential Services including apartments, condos, and group homes. NaMetris can be reached at NaMetris.Norman@monarchnc.org or on her cell phone at 704-385-1332. Melinda Pompey, BSW remains the Operations Director over this same service array and she can be reached at Melinda.Pompey@monarchnc.org or via her cell phone at 980-219-3600.
 - Ben Millsap, MSW, LCSW, LCAS, CCS has been appointed the Regional Clinical Director and can be reached at Ben.Millsap@monarchnc.org or via cell phone at 704-968-7102. Kirsten Vaca, MA is the Regional Operations Director and can be reached at Kirsten.Vaca@monarchnc.org or via cell phone at 704-635-0133.
- ⇒ Wesley E Mason III is the new CEO for The Village.

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⇒ Footprints Carolina Inc. has recently merged with True Behavioral Health Care. TBH is a CABHA certified agency that is "Truly Committed to Serving the Unique Behavioral Health Recovery Needs of Children, Families, and Adults." The Mecklenburg County office will remain at the same location of 5700 Executive Center Drive Suite, and the phone number remains the same at 704-566-3460. Dammeon L. Chisholm will continue to serve in the capacity as the Team Lead for the Mecklenburg County Catchment Area. His email address is now dchisholm@trueskids.com.

PROVIDER COUNCIL REMINDERS AND UPDATES

- ⇒ The Provider Council Executive Board would like to extend a warm welcome to its newest members: Shanda Knox at Enter Pro, and Kimberly Crump at Carolina Family Comprehensive Services.
- ⇒ **Provider Council Sub-Committees** – Three standing subcommittees have been formed by the Provider Council. If you are interested or want more information, please contact the committee chairs. The four committees are:
- **Training and Development Committee** Trasha Black (Co-Chair), Genesis Project, tblack@genesisproject1.org, 704-596-0505
 - ◆ Angela R. Simmons (Co-Chair), The Right Choice MWM, 704-537-3650 x1105, angela@trcmwm.com.
 - > The next scheduled meeting is **Wednesday, April 20, 2011 at 9 AM** in the Carlton Watkins Center Multipurpose room.
 - **Provider Relations Sub-Committee**
 - ◆ Kira Wilson (Co-Chair), The Arc of NC, 704-568-0112, kwilson@arcnc.org
 - ◆ Tim R. Holland (Co-chair) Person Centered Partnerships, 704-319-7609, Tim.Holland@pcpartnerships.org
 - > The next scheduled meeting is **Wednesday, April 20, 2011 at 1:30 PM** in the Carlton Watkins Center Multipurpose room.
 - **Provider Outreach Sub-Committee** – The general purpose of which is to establish mechanisms for the Provider Council to connect with new providers, to provide them basic resource information and to introduce them to the Provider Council.
 - ◆ Miranda Little (Co-Chair), Family Preservation Services, Inc., 704-344-0491, mlittle@fpsc corp.com
 - > The next meeting will be on **Wednesday, April 20, 2011 at 12 PM** in the Carlton Watkins Center Multipurpose room.
 - **Quality Improvement Sub-Committee** - The general purpose of this committee is to collectively organize a sound quality approach to delivery of clinical service as well as general standards for quality for MH/SA/DD providers. Angela Bunting (Co-Chair), BWB Connections, 704-595-5553
 - ◆ Sonyia Richardson (Co-Chair), Another Level Counseling & Consultation, 704-548-5298
 - > The next meeting will be on **Wednesday, April 20, 2011 at 10:30 AM** in the Carlton Watkins Center Multipurpose room.

EDUCATION AND TRAINING OPPORTUNITIES

- ⇒ **MeckCARES Training Institute** offers a full range of high-quality classroom and now [online courses](#) that meet state service definitions and requirements and will empower you to improve outcomes for youth and families.
- Learn about System of Care principles and practices
 - See how Child and Family Teams should operate
 - Gain knowledge, power and respect to strengthen families and improve lives

Register Today! <http://charmec k.org/mecklenburg/county/MeckCARES/training/Pages/default.aspx>

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- ⇒ **Mecklenburg's PROMISE Recovery and Crisis Training Calendar.** MeckPromise is offering free Wellness, Recovery & Crisis Education classes for consumers and providers at our new location 1041 Hawthorne Lane, Charlotte, NC 28205. Please feel free to drop by and see what we've got going on! For more information on our classes please call 704-625-6236 or email John Cunningham at jcunningham@meckpromise.com to request a current calendar.
- ⇒ **The Mecklenburg County Provider Council** has developed a comprehensive Training Calendar designed to serve as a one-stop location to view training events occurring in Mecklenburg County that are supported or sponsored by the provider community, the LME, AHEC or other entities. Following is a link to submit training events: <http://www.meckpromise.com/node/75>. To view training events, click on the following link: <http://www.meckpromise.com/mptc>
- ⇒ **The LME Monthly AMH Training Calendar** is posted on-line at the following link:
<http://charmec.org/mecklenburg/county/AreaMentalHealth/ForProviders/Pages/ProviderTraining.aspx>
- ⇒ **TIP – Training in Innovation and Practice** –The NC Council of Community Programs and the Administrative Services Organization, a group of providers, continue to offer training to help providers adapt to changing circumstances. For a list of currently scheduled training events and to register, go to www.nc-council.org.
- ⇒ **Mental Health Association** offers various training opportunities in collaboration with Charlotte AHEC. Please visit website <http://www.charlotteahec.org/> for more information.

WEB RESOURCES

- ⇒ [NC Division of MH/DD/SAS](#)
- ⇒ [NC Division of MH/DD/SAS Implementation Updates](#)
- ⇒ [Mecklenburg AMH](#)
- ⇒ [AMH Best Practices Committees and Schedule](#)
- ⇒ [AMH Hot Sheet Archive](#)
- ⇒ [AMH Provider Document Library](#)



North Carolina Department of Health and Human Services
Division of Medical Assistance

2501 Mail Service Center • Raleigh, N. C. 27699-2501 • Tel 919-855-4100 • Fax 919-733-6608

Beverly Eaves Perdue, Governor
Lanier M. Cansler, Secretary

Craig L. Gray, MD, MBA, JD, Director

To NC Medicaid Prescribers,

It is a pleasure for me to announce the launching of an exciting new initiative that we expect will improve the quality of care for children enrolled in the North Carolina Medicaid program. During the past year in North Carolina, almost 9,000 Medicaid recipient children ages 12 or under received at least one prescription for an antipsychotic medication. While the medications may be beneficial in some cases, they also may result in side effects of the metabolic (weight gain, elevated lipids and diabetes) and neurologic (tremors, rigidity, restlessness, and other involuntary movements) type. Many of these prescriptions were for “off label” indications (not yet approved by the Food and Drug Administration due to lack of sufficient safety and efficacy data), such as aggressive behavior. The Division of Medical Assistance, Community Care of North Carolina, and Child Psychiatrist experts from our 4 North Carolina Medical Schools have worked together to develop a novel web-based safety monitoring program that will assure routine use of adequate safety monitoring if these medications are used for off label indications. The name of this project is the A+KIDS program, which is an acronym for Anti-psychotics, Kee*p* It Documented for Safety.

Beginning in March 2011 providers will be contacted to alert them to this program and to help them with system registration. The program will request prescribers to go on-line and enter monitoring information. The official registry start date is April 12, 2011. The data to be collected mirrors the safety monitoring requirements as recommended by the American Academy of Child and Adolescent Psychiatrists and should be part of a routine exam. The initial rollout of the program only applies to safety monitoring information for Medicaid recipient children ages 12 and under. We expect to expand the program to children ages 13-17 by later this summer.

I would like to thank everyone in advance for their cooperation. Our goal is to be sure that the children of North Carolina who need these medications will have them prescribed and monitored according to the best evidence-based practices available.

Sincerely,

A handwritten signature in cursive script that reads "Randall Best".

Randall Best, MD, JD
Chief Medical Officer



Dear Providers, Parents, Youth, and Community Leaders:

The Char-Meck Youth Leadership Collaborative is working to develop a youth-driven community resource leadership collaborative called WHEELS. The purpose of WHEELS would be to meet the needs of community youth with a sustainable model that could be replicated in other communities, and continues to support and drive our System of Care.

We are inviting youth between the ages of 13 and 21 to join us on April 1, 2011 to a youth forum where their voices will be heard. In a fun, interactive way we will be listening to young people's responses to questions, including "What does a youth leader mean to you?" or "What do you really need?" and give youth an opportunity to express themselves, tell the community what they need, and share with them how they can become founding members of WHEELS – a youth-driven leadership initiative. The youth forum will take place on Friday, April 1, 2011 (Teacher work day) from 12 pm -- 3 pm at Covenant Presbyterian Church in the Fellowship Hall (1000 E. Morehead Street, Charlotte NC).

We need your assistance in sharing this information with young people that you know. We are looking for young people between the ages of 13 to 21, of all socio-economic backgrounds, male and female, of differing sexual orientation, tall, short, diverse cultural backgrounds, attending public and private schools, representing a variety of faith /beliefs, and ideas that they are willing to share. We want this to be an opportunity for all young people in our community who have a desire to have their voices heard.

Below is a flyer to share with young people and parents. You can print out the attachment and forward this email on to any group/individual you believe should be involved. If you have questions, please feel free to call 704-336-3793.

Looking forward to an exciting event with our young people on April 1st!

Is Your VOICE being heard?

Who's Listening

- ★ Tired of being told what you need?
- ★ Use Your Voice - Tell the community what YOU really need.
- ★ Express yourself!
- ★ What does a youth leader mean to you???
- ★ Become a Founder Youth Leader for WHEELS - A youth-driven leadership initiative in Charlotte-Mecklenburg!
- ★ Influence how decisions are made about your future!
- ★ Help design the WHEELS LOGO!!

The 411

Friday, April 1st (It's a CMS Teacher Work Day!)

12:00 pm - 3:00pm

Covenant Presbyterian Church Fellowship Hall
1000 E. Morehead Street

Youth Ages 13 - 21

FOOD/FUN ACTIVITIES

PRIZES AND GIVEAWAYS

WHEELS IS AN INITIATIVE SPONSORED BY
CHAR-MECK YOUTH LEADERSHIP
COLLABORATIVE

RSVP CONTACT: 704-336-3793
MECKCARES.CHARMECK.ORG

Project STAR at Carolinas Rehabilitation is offering Traumatic Brain Injury (TBI) 101

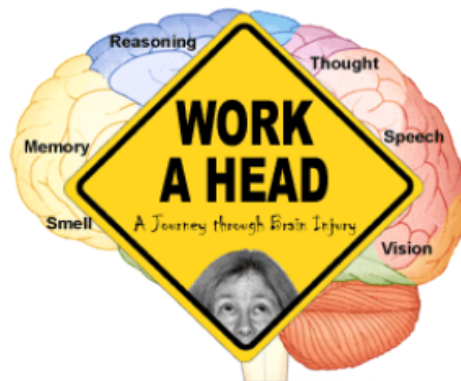
**Basic Information on Traumatic Brain Injury (TBI),
the consequences of TBI, strategies to compensate for
TBI related difficulties, and brain injury resources.
Workshop is FREE and continuing education contact
hours are available**

**For: Mecklenburg County LME staff &
Service Provider Agencies**

**When: Monday, May 23, 2011
8:30am to 12:30pm**

**Where: Carlton Watkins Center
3500 Ellington Street, Charlotte, NC
Multipurpose Room**

**Presenters: Peggy Philbrick and Sally Rickard with
Project STAR at Carolinas Rehabilitation**



Please register by e-mailing:

Sally.rickard@carolinashealthcare.org

**Please include Agency Name, Attendee Name, Phone
Number and E-mail**

COME JOIN US & HAVE YOUR SAY!!!

You are invited to a

Town Hall Meeting

on

**Mental Health, Developmental Disability, and Substance Abuse Services
Sponsored by The Coalition**

The Coalition, 40 organizations advocating together to meet the needs of North Carolinians living with the developmental disabilities, the disease of addiction, & mental illness, will host a series of town hall meetings on MH, DD, & SA services across the state. These listening sessions will:

- Provide a briefing on the current budget outlook
- Offer an opportunity to share your opinions about MHDDSA services and supports; in person, in writing, or online
- Update you on how to make a difference on these issues through advocacy

TIME: All meetings are from **6:30 to 8:30 PM**. Doors will open at 6:00 PM and the program begins at 6:30.

DATES & LOCATIONS:

March 17 – Charlotte

Myers Park United Methodist
Church
1501 Queens Road, Charlotte

March 31 - Wilmington

Hampton Inn
2320 South 17th Street,
Wilmington

March 17 – Raleigh

NC Advocates for Justice
Building
1312 Annapolis Drive, Raleigh

April 7 – Winston-Salem

Forsyth Community College,
Main Campus
Ardmore Hall Auditorium
2100 Silas Creek Parkway

March 24 - Fayetteville

Southern Regional AHEC
1601 Owen Drive

April 7 - Asheville

Mountain Area Health Education
Center (MAHEC)
501 Biltmore Ave

March 31 –

Greenville/Winterville

Pitt Community College
Leslie Building - Room 143
1986 Pitt Tech Road Winterville

Director
704-432-0695

Assistant Director
704-336-4757

Clinical Supervisor
704-432-5539

Resource Development Coordinators
704-432-0698 or 704-432-4576

Administrative Support
704-432-4592

School Nurse
704-355-4088
(enter ID #4988)

ParentVOICE
704-336-7128

Training Coordinator
704-432-0986

Public Information Specialist
704-336-3793

MeckLINK
704-336-6404

Open Invitation to all Mental Health Agencies: Theme: “Resilience is…….”

On May 7, 2011 Mecklenburg County will recognize National Children’s Mental Health Awareness Day. MeckCARES, in partnership with Teen Health Connection, The Junior League of Charlotte, ParentVOICE and others, will host a community event.

This is the 5th year that MeckCARES and community partners will host an awareness event, to provide mental health related education, information and resources to the community. Each year we have a large representation from families who are living with a child that has mental health challenges. We expect this year’s event to draw over 1,500 people to Pearl St Park.

We would like to invite your agency to participate in this event. For your convenience, we have **identified** several ways that you can be involved in this event. As you are aware, it takes financial and human resources to plan a successful event and that is why we are asking you for your help. Your participation will help make this event the best it can be for our entire community. Please review the list below and decide which level of involvement your agency is willing to commit to.

Full Partnership:

You would participate with the planning committee under the leadership of youth and Parents. This level of participation offers a place to set up an informational station at the event to talk with families about the services you are providing in the community and to pass out your promotional information. You will also have the option to have your materials placed in our giveaway bags should you choose not to set up an information table. You would invite all the families that you work with to attend the event on May 7th. Your agency can form their own basketball team to compete with other teams at the event. Your agency’s name would be listed on all event materials that identify MeckCARES partners. This list would also be posted on the MeckCARES website. You would receive a System of Care Certificate for your partnership. This level of partnership requires a one-time fee of \$100.00 per agency

Supporter:

You can participate with the planning committee under the leadership of Youth and Parents. You would invite all the families that you work with to attend the event on May 7th. Your agency would be listed on some event materials as a supporter. You would receive a System of Care certificate for your support. This level of support requires a one-time fee of \$50.00 per agency



MECKLENBURG COUNTY

DEPARTMENT OF INTERNAL AUDIT



ANTI-FRAUD POLICY

PURPOSE

This policy is established to provide increased protection to the assets and financial interests of Mecklenburg County; to provide a coordinated approach to the identification, investigation and resolution of fraudulent activities; and to increase the overall awareness of employees' responsibility to report fraud and reasonably suspected fraudulent activity to the appropriate County parties.

RESPONSIBILITIES

Mecklenburg County (the "County") has a zero tolerance regarding fraud and expects everyone to play a role to help prevent fraud, waste and abuse. All County employees are responsible for safeguarding County resources and ensuring that they are used only for authorized purposes, in accordance with applicable laws and County policies. Mecklenburg County expects the same honesty and integrity from its consultants, temporary staff, vendors and anyone having business with Mecklenburg County.

All levels of County management are accountable for setting the appropriate tone of intolerance for fraudulent acts by displaying the proper attitude toward complying with laws, regulations and County policies. Management is responsible for identifying and assessing the level of the risks and exposures to fraudulent activity inherent in his or her area of responsibility. Management will support and cooperate with Internal Audit, other involved departments and law enforcement agencies in the detection, reporting and investigation of fraudulent activity. Additionally, management shall establish and maintain proper internal controls, which will provide for the security and accountability of the resources within his or her department.

AUTHORIZATION

The Mecklenburg Board of County Commissioners governs and authorizes the County to employ the proper use of finances and other resources in a manner that ensures accountability, good internal controls and effective risk management. The County may involve the state or local police in any investigation where there is evidence of potential criminal activity. The County may seek financial reimbursement for any financial losses incurred through such criminal activity.

SCOPE

This policy applies to any situation of fraud or suspected fraud involving County employees, vendors, contractors, consultants, outside agencies and/or any other parties with a business relationship with the

County. Any investigative activity conducted will be done without regard to the suspected wrongdoer's title/position, past performance or length of service to the County.

GENERAL DEFINITIONS AND EXAMPLES

For purposes of this policy, fraud includes any willful or deliberate act committed with the intention of obtaining an unauthorized benefit, such as money or property, by misrepresentation, deception or other unethical means. Fraud and financial impropriety may include, but are not limited to, the following actions:

- embezzlement or other financial irregularities
- forgery, alteration or falsification of documents, such as checks, time sheets, travel expense reports, contractor agreements, purchase orders, other financial documents or electronic files
- misappropriation, misuse, theft, removal or destruction of County resources, such as funds, supplies, inventory, furniture, fixtures, equipment or any other asset
- improprieties in the handling or reporting of money or financial transactions
- misuse of County facilities, such as telephones, computers and e-mail system
- false claims by employees, vendors or others associated with the County
- receiving or offering bribes, rebates or kickbacks
- personal use of County property in commercial business activities
- accepting or seeking anything of material value from contractors, vendors or persons providing or seeking to provide services/materials to the County, except as permitted by law and County policy
- undisclosed conflict of interest
- deliberate misrepresentation of facts
- any similar or related irregularity

FRAUD INDICATORS

The following, though non-exclusive, may indicate fraudulent financial activities:

- excessive number of missing or voided documents
- altered documents
- questionable handwriting or approval
- documents not numerically controlled
- duplicate payments
- unusual billing addresses or arrangements
- vendor's billing address the same as an employee's address
- unauthorized use of duplicate or photocopied invoices

REPORTING FRAUD

Employees and other individuals associated with the County who become aware of or have a reasonable basis for believing that fraud, defalcation, misappropriation or other fraud, waste or abuse has occurred shall promptly report the suspected activity to their supervisor or their department director. Alternatively, the employee can contact Internal Audit either directly or anonymously using the Report Line via the County's main intranet page under "Ethics Matter".

Individuals shall not attempt to personally conduct an investigation or interview individuals suspected of being involved in the suspected fraudulent activity. Great care must be taken in dealing with suspected fraudulent activities to avoid any incorrect accusations, alerting suspected individuals that an investigation is under way, violating a person's right to due process or making statements that could lead to claims of false accusations or other civil rights violations.

NON-FRAUD REPORTING

Identification or allegations from employees of personal improprieties or irregularities, whether moral, ethical or behavioral, should be resolved by department management and/or the Human Resources Department. The employee should contact the Human Resources Director or Internal Audit if he or she has any questions of whether an action constitutes fraud.

CONFIDENTIALITY

Mecklenburg County will at all times maintain the confidentiality of all concerns, associated reports, working papers and other documents within the limitations of law, County policy and the legitimate needs of an investigation. The results of investigations conducted by Internal Audit will not be disclosed or discussed with anyone other than those persons that have a legitimate need to know in order to perform their duties and responsibilities and as allowed by law. This is important in order to avoid damaging the reputations of persons suspected but subsequently found innocent of wrongful conduct and to protect the County from potential civil liability.

INVESTIGATION

The Department of Internal Audit is the primary County department responsible for conducting investigations of fraud and suspected fraudulent activity reported to it or that it has identified that may represent risk of significant loss of assets or reputation to the County. Internal Audit will work according to the County's investigation protocol, which includes the County's general legal counsel, Human Resources and Information Security. Internal Audit and/or General Counsel may also work with police and other law enforcement agencies as circumstances may require.

In the event that Internal Audit determines an investigation of suspected fraudulent activity is warranted, the Department will conduct the procedural steps as outlined in the County's investigation protocol.

- Promptly notify the County Manager and the investigation team.
- The Human Resources Director will determine if any immediate disciplinary personnel actions should be taken.
- If federal funds are involved, determine the required federal reporting in cooperation with the grantee department and County's general legal counsel.
- If illegal activity is indicated, general legal counsel will notify the Charlotte City Police to coordinate an investigation.
- If illegal activity appears to have occurred, the findings will be reported to the appropriate agency for review, which will be coordinated with the County's general legal counsel.

In the course of investigation, Internal Audit will have free and unrestricted access to all County data, employees and premises; and the authority to examine, copy, and/or remove all or any portion of the contents of files, desks, cabinets, and other storage facilities on the premises without prior knowledge or consent of any individual who may use or have custody of any such items or facilities when it is within the scope of their investigation. Employees are expected to fully cooperate in authorized investigative inquiries.

INVESTIGATION REPORTING

Internal Audit will communicate the results of any investigation to responsible management, the County Manager, the Board of County Commissioners and the Audit Review Committee. Internal Audit will also make recommendations for improvement to the systems of internal control, as needed. The determination to prosecute or turn matters over to appropriate law enforcement and/or regulatory agencies for independent investigation will be made by the County's general legal counsel and executive management.

DISCIPLINARY ACTION

The County will take appropriate disciplinary and legal action against any individual or entity who commits fraud against the County, which may include but is not limited to, discharge from employment and/or criminal prosecution under appropriate State and federal laws. An employee found to have obstructed the investigation of a concern or complaint of fraudulent activities will also be subject to disciplinary action. If after investigating a complaint of fraud the County determines that an employee's complaint is frivolous or that the employee has intentionally provided false information regarding the complaint, the employee will be subject to disciplinary action.

EMPLOYEE PROTECTION

Mecklenburg County will not retaliate, nor will it tolerate retaliation, against those who in good faith report suspected ethics violations or who participate in an investigation of suspected ethics violations. Employees who believe they are being retaliated against for reporting their concerns are encouraged to discuss the matter with their manager or supervisor. If they wish to pursue the matter formally, they should consult with Human Resources. They may file a complaint under the applicable grievance or complaint resolution procedures.

DETECTING FRAUD AND CORRUPTION

The County has established internal controls, policies and procedures in an effort to deter, prevent and detect fraud. All new full-time employees are subject to background investigations, including a criminal background check. All temporary, part-time and seasonal employees may be subject to a criminal background check based on position and possible duration or employment. The County may also verify all applicants' employment history, education and personal references prior to making an offer of employment.

All vendors, contractors and suppliers must be active, in good standing and authorized to transact business in Mecklenburg County. Vendors, contractors, and suppliers may be subject to screening. When necessary, contractual agreements with the County may contain a provision prohibiting fraudulent acts and will include information about reporting fraud.

Each County employee will be required to attend an anti-fraud awareness training session each fiscal year. Records will be maintained in the Human Resources Department indicating that the employee has successfully completed the training. New employees will receive this policy as part of their training at orientation.