


LDH Compliance Reporting Policy

	Louisiana Department of Health (LDH)	
	Policy Number	129.2
	Content	Compliance Reporting Policy
	Effective Date	October 27, 2023
	Inquiries to	Office of the Secretary Compliance Officer P.O. Box 629 Baton Rouge, LA 70821-0629 (225) 219-3454 FAX (225) 342-2065

LDH is committed to fostering, cultivating and preserving a culture of equity, diversity and inclusion. Our human capital is the most valuable asset we have. The collective sum of the individual differences, life experiences, knowledge, inventiveness, innovation, self-expression, unique capabilities and talent that our employees invest in their work represents a significant part of not only our culture, but our Department’s reputation and achievement as well.

If there is a discrepancy between an LDH Policy and a Program Office or facility policy, the LDH policy shall govern/override/supersede the conflicting section within the Program Office or facility policy.

I. POLICY STATEMENT

It is the policy of LDH to establish formal procedures for employees and contractors to report issues or ask questions associated with LDH’s policies, conduct, practices, or procedures believed by the individual to be a potential violation of criminal, civil or administrative law.

II. APPLICABILITY

This policy applies to all Louisiana Department of Health employees, contractors, subcontractors, agents, and other persons who furnish patient care items or services or who perform billing or coding functions on behalf of LDH, except for those vendors whose sole connection with LDH is selling or otherwise providing medical supplies or equipment to LDH.

III. POLICY PROVISIONS

- A. All employees and contractors are required to report any reportable incidents.
- Reportable incidents include but are not limited to:
 - Any instance where an employee or contractor has reason to believe that another employee or contractor is engaged in or plans to engage in conduct prohibited by the Compliance Plan;
 - Any instance where an employee or contractor has reason to believe that any other person or entity associated with the LDH plans to violate the standards of conduct or the policies and procedures contained in the Compliance Plan or any other statutes, regulations or policies to which the LDH is subject;
 - Any instance where an employee or contractor is instructed, directed or requested to engage in conduct prohibited by the Compliance Plan or any other statutes, regulations or policies to which the LDH is subject;
 - Any instances, issues or questions associated with LDH's policies, conduct, practices or procedures with respect to State and/or Federal Programs within LDH believed by the individual to be a potential violation of criminal, civil or administrative law.
 - Any other instances that employees or contractors believe may involve illegal or questionable activity (including, but not limited to, employee throwing state assets in the garbage, employee going through another employee's desk) associated with the operations of LDH.
- B. Employees or contractors may report incidents through any of the following mechanisms:
- Report to their immediate supervisor
 - Report to their Compliance Liaison
 - Report to LDHreportfraud@la.gov (this may be done anonymously or the individual may provide their name, phone number or other identifying information). This email is monitored by the Compliance Officer and Compliance Investigator.
- C. In those circumstances where an employee feels uncomfortable reporting to their immediate supervisor or Compliance Liaison and wants to report to someone outside of their organizational unit, they may report to one of the following:
- Compliance Officer in the Office of the Secretary
 - Compliance Investigator in the Office of the Secretary
 - Director of Internal Audit

- D. Supervisors and Compliance Liaisons receiving reports of illegal or questionable activity will forward reports to one of the following:
- Compliance Officer in the Office of the Secretary
 - Compliance Investigator in the Office of the Secretary
 - Director of Internal Audit
- E. Reporters may request to remain anonymous by informing the individual they are reporting to that they wish to remain anonymous or by using the LDHreportfraud@la.gov email address and indicating their wish to remain anonymous in that email. Any individuals who are involved in the review and investigation processes will maintain the anonymity and confidentiality of reporting individuals.
- F. The reporting methods will be publicized through the following methods:
- A statement will be included at the bottom of each LDH Today newsletter providing the email link to make reports.
 - A flyer will be posted on bulletin boards in various locations throughout LDH.
 - Reporting methods will be included in all compliance training provided by LDH to LDH staff and contractors.
- G. LDH maintains an affirmative duty to protect its employees from harassment, reprisal, or retaliation. This protection extends to any employee making a good faith complaint of a reportable incident, as well as those employees providing information or participating in the investigative process. Employees can be assured that if a complaint is made and an investigation reveals that harassment, retaliation or reprisal has occurred, disciplinary action shall be imposed on the offender, up to and including dismissal.

IV. RESPONSIBILITIES

- A. All LDH employees and contractors are responsible for reporting any reportable incidents through one of the above listed reporting mechanisms.
- B. Supervisors and Compliance Liaisons are responsible for referring reports of illegal or questionable activity to the LDHreportfraud@la.gov email address, Compliance Officer, Compliance Investigator, or Director of Internal Audit.

V. DISCIPLINARY ACTIONS

Violations of this policy may result in corrective action or disciplinary action. Corrective action includes Improvement Letters (Civil Service Rule 12.9), verbal counseling, documented

counseling, and/or reprimand. Disciplinary actions are Suspension without Pay, Reduction in Pay, Involuntary Demotion and Dismissal (Civil Service Rule 12.3). Any disciplinary action taken is at the sole discretion of the Appointing Authority.

Any LDH contractor who violates this policy may be subject to sanctions in accordance with their respective contract(s).

VI. REVISION HISTORY

Date	Revision
March 2, 2020	Policy created
August 11, 2022	Policy reviewed – no changes
October 27, 2023	Policy revised
October 31, 2024	Policy reviewed