



# FALSE CLAIMS ACTS: HHSA CONTRACTOR REQUIREMENTS

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Agency Compliance Office  
County of San Diego – Health and Human Services  
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## DISCLAIMER

This slide deck is intended as a resource to assist HHSA contractors with common topics related to their contractual requirements. This slide deck is not intended to be a comprehensive set of contract requirements nor legal advice. For a comprehensive description of your contractual requirements, review your contract language.



## WHAT ARE THE FALSE CLAIMS ACTS?

- The Federal and State False Claims Acts were enacted to combat fraud, waste and abuse committed by contractors against the government
  - Federal False Claims Act (31 USC 3729-3730)
  - California False Claims Act (CA Govt Code 12650-12653)
- We often refer to both sets of rules, together, as 'FCA'
- Contractors' FCA requirements are typically found in the County contract template, section 8.18



## WHAT ARE CONTRACTORS' REQUIREMENTS?

- Contractors must ensure all of their workforce members are trained on FCA, at least annually
  - 'Workforce members' include all positions paid by the contract, including those paid with indirect funds. 'Workforce members' also include those with access to County clients or County client data, even if the positions are unpaid
- Contractors must maintain verification of the training
- Contractors must pass down FCA requirements to their subcontractors, consultants, and other agents



## WHERE CAN I FIND THE RULES THEMSELVES?

- Federal False Claims Act:
  - <https://www.justice.gov/civil/false-claims-act>
- California False Claims Act:
  - [https://leginfo.legislature.ca.gov/faces/codes\\_displaySection.xhtml?lawCode=GOV&sectionNum=12650.&article=9.&highlight=true&keyword=False%20Claims%20Act](https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=GOV&sectionNum=12650.&article=9.&highlight=true&keyword=False%20Claims%20Act)



## WHERE CAN I FIND FCA TRAINING?

- There is not a specific training/slide deck that is required of Contractors
- The Agency Compliance Office has posted its FCA training here:  
[https://www.sandiegocounty.gov/content/sdc/hhsa/programs/sd/compliance\\_office/contractor\\_assistance.html](https://www.sandiegocounty.gov/content/sdc/hhsa/programs/sd/compliance_office/contractor_assistance.html)

# FALSE CLAIMS ACTS



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## MORE QUESTIONS? ASK US!

Christy Carlson

Group Program Manager

[Christy.Carlson@sdcounty.ca.gov](mailto:Christy.Carlson@sdcounty.ca.gov)

619-338-2807

Angie DeVoss

Privacy & Deputy Compliance Officer

[Angie.Devoss@sdcounty.ca.gov](mailto:Angie.Devoss@sdcounty.ca.gov)

619-338-2808

[www.cosdcompliance.org](http://www.cosdcompliance.org)