



FALSE CLAIMS ACT

Requirements for HHSA Providers

County of San Diego – Health and Human Services

Business Assurance and Compliance

March 2025

Disclaimer



This slide deck is intended as a resource to assist HHSA providers 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.

False Claims Act



What are the False Claims Acts?

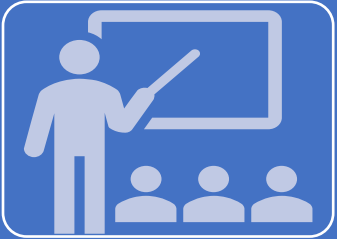
- The Federal and State False Claims Acts were enacted to combat fraud, waste and abuse committed by providers against the government
 - Federal False Claims Act (31 USC 3729-3730)
 - California False Claims Act (CA Govt Code 12650-12653)
- We often refer to both sets of rules, together, as 'FCA'
- Providers'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



False Claims Act



What are Providers' Requirements?

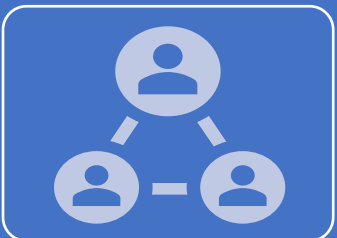


Providers must ensure all of their workforce members are trained on FCA, at least annually

- '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



Providers must maintain verification of the training



Providers must pass down FCA requirements to their subcontractors, consultants, and other agents

False Claims Act



Where can I find the rules themselves?

Federal False
Claims Act

California
False Claims
Act



False Claims Act



Where can I find FCA training?

- There is not a specific training/slide deck that is required of Providers
- HHSA BAC has posted its FCA training here: [Provider Resources](#)

Requirements, Responsibilities and Training

BAC serves as a compliance, privacy, and security resource to HHSA programs and providers, and offers a variety of educational resources, including the following:

- [Article 14 Requirements for Providers](#)
- [Background Check Requirements for Providers](#)
- [Code of Ethics Requirements for Providers](#)
- [Exclusion and Debarment Requirements for Providers](#)
- [Exclusion and Debarment Helpful Hints for Providers](#)
- [False Claims Act Roles and Responsibilities for Providers](#)
- [False Claims Act Requirements for Providers](#)
- [False Claims Act Training for Providers](#)

False Claims Act



More questions? Ask us!



Website:

www.cosdcompliance.org



Phone Number:

(619) 237-8571



Mailbox:

PrivacyOfficer.HHSA@sdcounty.ca.gov

Compliance.HHSA@sdcounty.ca.gov