I. Policy Statement
   a. This policy ensures cooperation with regulatory and oversight agencies while protecting the rights of MU Health and its workforce members.
   b. MU Health and its employees will cooperate fully with any government audit, interview, search or other investigation.

II. Definitions
   a. “Government” means any federal, state or local regulatory, oversight or enforcement agency (for example: the Office of Inspector General; State of Missouri Department of Health and Senior Services), or any professional licensing entity (for example: the Board of Healing Arts).

III. Process/Content
   a. There are various ways in which Government agencies may carry out an investigation or audit. MU Health policy is to cooperate fully with all legal investigations, while protecting the rights of MU Health, its patients and its workforce members. The following procedures should be followed in responding to Government inquiries.
   b. Search Warrants
      i. A search warrant is a written court order entitling law enforcement officers to search a defined area. A properly executed search warrant must clearly identify:
         1. The officer who is entitled to conduct the search;
         2. The specific areas or facilities to be searched; and
         3. The specific items to be reviewed or seized. In addition to search warrants, certain government agencies such as the Office of the Inspector General have the authority to demand immediate access to pertinent records of Medicare/ Medicaid providers.
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ii. In the event that MU Health employees are served with a search warrant or other legitimate request for immediate access to records, the following steps shall be taken:

1. Ask for the credentials of the requestor, note the date and time that the warrant or other request is made, and by whom.
2. Immediately notify your supervisor and the Office of Corporate Compliance (OCC) at 573-884-0632.
3. The OCC will notify the Office of the General Counsel (OGC) immediately.
4. Follow the directions received from either your supervisor, the OCC, or the OGC.
5. MU Health employees should not interfere with a search.

c. Subpoenas

i. A subpoena is a document directing a person to appear and to testify at a given time and place. A subpoena duces tecum requires you to bring certain documents and other items with you when you testify. Subpoenas may be issued by a court, a grand jury, or a lawyer representing a party in a civil or criminal matter, or by Government agencies.

ii. If an employee receives a subpoena issued by a Government agency for document production he or she should:

1. Note in writing, by date and time, exactly when the subpoena was received and how it was served.
2. Contact your supervisor and the OCC at 573-884-0632.
3. The OCC will notify the OGC immediately.
4. Follow the directions received from either your supervisor, the OCC, or the OGC.
5. If a subpoena issued by a Governmental agency relates to one of the following areas, contact with the OCC and OGC is not required. However, employees should still feel free to contact the OCC or the OGC if they have questions or concerns.
   a. Routine requests for medical records accompanied by an authorization should be directed to Medical Records.
   b. Other matters that the OGC has deemed to be routine and has agreed to a process and specific contact point.

iii. If an employee receives a subpoena issued by a Government agency to testify, he or she should consult with the OGC for direction and guidance concerning compliance with the subpoena.
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d. Talking with Government Investigators
   
é. MU Health employees may be contacted by Government investigators either on or off the work site. Employees have the right to choose whether to talk to these investigators. Employees have the right to consult an attorney before answering questions, and to have counsel present during the interview. It is recommended that any conversation with an investigator take place in person, not on the phone. Employees should ask for the credentials of the investigator, answer only the questions asked, be truthful, and not speculate about matters beyond their direct knowledge.

ii. If an employee chooses to talk to investigators, the employee should be cooperative and answer questions to the best of their ability.

IV. Attachments

   a. Not Applicable.

V. References, Regulatory References, Related Documents, or Links

   a. Important Telephone Numbers:
      
é. Ethics and Compliance Hotline: 866-447-9821
   
   ii. Office of Corporate Compliance: 573-884-0632
   
   iii. Office of the General Counsel: 573-882-3211

   b. Ethics and Compliance Hotline web link: [https://www.compliance-helpline.com/UM.jsp](https://www.compliance-helpline.com/UM.jsp)