Scope:
Accountable Care Organization; Administrative & Business Offices; Ambulatory; Behavioral Health; Breast Health Center; Center for Advanced Medicine B; Center for Advanced Medicine C; foundation; Healthcare Center; Home Health; Hometown Health; Hospice; Hyperbaric; Laboratory; Medical Group; Monaco Ridge; Pregnancy Center; Regional Medical Center; Rehabilitation Hospital; Skilled Nursing; South Meadows Medical Center; Surgical Arts; Therapies; Urgent Care; Wound Care; X-ray & Imaging

Policy Statement:
It is the policy of Renown Health (“Renown”) to fully cooperate with any government investigation. This policy sets forth the rights, duties, and responsibilities of all Renown employees and Board Members in the event of an investigation. Renown employees and Board Members shall remain courteous and business-like when dealing with governmental investigators or auditors, and will comply with instructions of management for the production of information, documents or records in response to any legitimate government inquiry, investigation, search warrant or subpoena.

Definition of Terms:
Government Investigation may include, but is not limited to, investigation by the Office of the Inspector General of the United States Department of Health and Human Services, Office of Civil Rights, United States Attorney General’s Office, the Federal Bureau of Investigation, the Nevada Attorney General’s Office, the Nevada Medicaid Fraud Control Unit, the District Attorney, or the County Sheriff.

Procedure:
1. If an employee is contacted or approached by an investigator while at Renown:
   a. Request Identification. Ask to see his/her badge or other credentials. Do not photo-copy the individual’s official credential/identification; the employee should write down:
      i. Name,
      ii. Title,
      iii. Agency/Department,
iv. Address, and
v. Phone Number.

2. Contact your supervisor or the Compliance Officer. Although it is Renown’s policy to cooperate with any investigation, the Compliance Officer is responsible for coordinating Renown’s response. You or your supervisor should contact the Compliance Officer immediately. The Compliance Officer will coordinate with senior management and General Counsel, as necessary, to ensure Renown’s response is appropriate and well-organized. Any media statement will be made by the appropriate party designated by General Counsel.

3. Prohibited Conduct related to a government investigation:
   a. Destroy or alter documents or records in response to a request by government investigators or in anticipation of such request;
   b. Lie or make false statements or misleading statements to any government investigator;
   c. Try to persuade another person to lie or provide false or misleading information to a government investigator;
   d. Interfere with a government investigation or the execution of a search warrant or subpoena; or
   e. Discuss the investigation, subpoena, search warrant or related events with the press or media.

4. Search Warrants, Subpoena, Court Order, or Investigative Demand.
   a. If presented with a government search warrant, subpoena, court order, or authorized investigative demand:
      i. Immediately inform the Compliance Officer, General Counsel, and/or President/CEO.
      ii. Do not provide documentation without approval. You may be asked to consent to a search and to sign a form acknowledging your consent. Politely decline to consent to the search and decline to sign the consent form. Employees are not authorized to provide, copy or distribute Renown documents or other information without approval. The Compliance Officer or General Counsel will coordinate disclosure of Renown documents, including but not limited to, payment and claims forms, patient records, correspondence, hospital policies and procedures, or other requested documents.
      iii. Ask the individual to wait in a used office or a location where business is not conducted and records are not stored. Although the investigator has no obligation to wait you should request the investigator to wait.
      iv. Request to view and photocopy the search warrant document. All search warrants must be current and signed by a judge.
      v. Do no alter or destroy any paper or electronic document or record that is the subject of a government investigation.
      vi. Do no obstruct or interfere with any government investigation.
      vii. General Counsel may be present during any government investigation.
b. If the investigator requests an interview with an employee or Board member, whether on Renown property or offsite, the employee may:

i. Consent or decline to the interview. You are under no legal obligation to speak with the investigator, but you may choose to do so. If you choose to speak with the investigator, you are legally obliged to tell the truth. Although you will not be speaking with the investigator under oath, you are liable for any lies or misrepresentations you make to the investigator. Limit your responses to statements of fact; if you do not recall or have no knowledge of what is being asked, simply say so.

ii. Ask to have someone else present. You may request a Renown representative or General Counsel present during the interview. It is generally advisable to have General Counsel with you while being interviewed.

iii. Schedule the interview for another time. You are not obligated to speak with the investigator at the time of request and may opt to schedule the interview at another place and time.

iv. End the interview at any time. Since you are under no obligation to speak to the investigator, you may end the interview at any time.

v. Employees and Board members should immediately report any off-site visits by the government agents, investigators or auditors to the Compliance Officer and President/CEO.

c. Execution of the Search

i. Renown shall designate one employee to communicate with the agents, execute the search and to take notes during the search for use by General Counsel in representing Renown. The employee should be advised:

1. The notes are to be taken in anticipation of litigation should be addressed to General Counsel and kept confidential.
2. That he or she should monitor the search and be present during the entire search process; however, the employees should not interfere with the search in any manner.
3. If privileged documents are requested, contact General Counsel for guidance.
4. Take careful notes regarding the type and location of the evidence seized, including any documents, computer records, physical items, photographs, and audio/video recordings.
5. The employee should be present during the entirety of the search.
6. Obtain a detailed receipt or inventory list of the documents and items seized by the agents. Ensure that the list contains sufficient detail to enable the identification of the documents and items taken by the agents.
7. Ask the agents for the opportunity to copy all documents or other records seized.
Any questions regarding the process should be addressed with General Counsel.

**References/Regulations:**
Renown.HRM.420 Personnel Records

**Contributors:**