

	Strong Home Care Group, Inc.	Corporate Compliance
	POLICY: Responding to Government Investigations	Policy #108A
	SECTION: 100A	
	Created: 9/1/98	Reviewed: 12/9/04 Revised:
	Approved by: Quality & Compliance Committee Date: 12/14/06	Reg: COP:

Policy: It is the policy for VNS to fully cooperate with any authorized government agency investigation (*See Procedure for Auditor Investigations - Unannounced Visits.*) The Organization has the right to be represented by legal counsel in any such investigation. If an employee is contacted at home or outside the office, Management must be notified immediately. If a patient informs an employee that they have been contacted by an investigator, Management must be contacted immediately.

Description:

Under no circumstances should an employee:

1. Destroy Company documents in anticipation of a request for those documents from a government agency.
2. Alter original documents (any additions to original documentation can be made with a signed, dated addendum.)
3. Lie or make misleading statements to government investigators, or
4. Pressure anyone to hide information from or provide false or misleading information to government investigators.

An employee who engages in such conduct is acting under his/her own volition and outside of the scope of their employment. Failure to comply with the above can result in a violation of the obstruction of justice statute.

PROCEDURE:

IN-HOUSE INVESTIGATOR

1. Receptionist Responsibility:
 - A. When the Auditor/Investigator Reports to the Reception Area the following steps will take place:
 1. The receptionist will notify the following people immediately: a) President, b)

Chief Financial Officer, c) Director Corporate Compliance and Quality Management, d) Director of Patient Services.

2. One of administrative staff will meet person in lobby.
3. The after hours receptionist will call the administrator on call if an auditor appears after day time hours.

2. Appointed Management Representative Responsibility:

- A. The administrative staff member above or designee receiving the auditor/investigator should ask to see the auditor/investigator's identification authorization letter and record their name and position.
- B. The staff member or designee receiving the auditor/investigator will notify the attorney. The staff member will contact: **Monday – Friday, 8:00 AM-4:30 PM Fred Holderle at Strong Corporate Compliance office (275-1912) or Ted Case at Strong Office of Counsel (275-5831). After hours page Strong Attorney on call at 275-2222.**
- C. The administrative staff member above or designee receiving the auditor/investigator will determine which room or other location will be assigned to the auditor/investigator.
- D. At least two staff members should participate in any interviews conducted by the auditor/investigator, and one of these staff members will be responsible for documenting all conversations. All materials provided to the auditor/investigator will be copied and recorded for the VNS file. In most cases, our attorneys will need to be notified.
- E. Unless instructed by the VNS attorneys, staff should be cooperative and answer questions honestly, but, as in all audit situations, staff should not volunteer additional information not requested by the auditor/investigator.
- F. Notify the Communications Group via E-mail that an audit is taking place.

IN HOME INVESTIGATION

1. When the Auditor/Investigator Calls or Visits Your Home
 - A. The employee contacted should ask to see identifications and/or their card. No questions need be answered until they notify one of the administrative staff listed above or the administrator on call.
 - B. The steps listed above will be followed in the event of an investigation.