

Policies of the University of North Texas Health Science Center	Chapter 14 – UNT Health
14.514 Government Investigations	

Policy Statement

UNTHSC is subject to announced and unannounced audits, surveys, and investigations by government agencies. UNTHSC faculty and staff must comply with the investigation procedures outlined herein.

Application of Policy

UNT Health Faculty and Staff

Definitions

1. UNTHSC Faculty and Staff: means all individuals employed by UNTHSC and designated to work for UNTHSC.
2. Compliance Response Team (CRT): “Compliance Response Team” is comprised of the following individuals: the President and CEO of UNT Health, the Chief Medical Officer, the Chief Financial Officer for UNT Health, the Clinical Services Compliance Officer and the Chief Compliance and Enterprise Risk Management Officer, and the Office of General Counsel.

Procedures and Responsibilities UNTHSC Faculty and Staff will follow the procedures to respond appropriately to an investigation.

1. Assure full cooperation with investigators within the authorized scope of such investigations:
 - a. If investigators arrive at a clinic, review the documents presented by the investigators to identify the entity under investigation, the address of the investigation, the authorized date and time for the investigation, the official authorizing the investigation, and the documents requested. Immediately notify the point person for the CRT – the Clinical Services Compliance Officer.

Responsible Party: UNTHSC Faculty and Staff

- b. Do not obstruct justice by concealing, altering or destroying physical evidence or making or encouraging false or misleading statements. Do not destroy medical records or any requested documents.

Responsible Party: UNTHSC Faculty and Staff

- c. Do not prevent investigators from carrying out their assigned responsibilities. Respectfully request for the investigation to not begin until a member of the CRT arrives.

- i. If request is denied; restrict the investigation to only the area(s) authorized by the documents.

Responsible Party: UNTHSC Faculty and Staff

- d. Request a copy of the warrant, affidavit, and/or subpoena from the investigators. Forward a copy of the warrant, affidavit and/or subpoena immediately to the Clinical Services Compliance Officer and the CEO/President of UNT Health.

Responsible Party: UNTHSC Faculty and Staff

- e. If a government official or investigator contacts an employee; the employee may decline or voluntarily agree to speak to them. The employee may choose to contact the Office of General Counsel before proceeding to speak to the government official or investigator. If the employee agrees to speak with the government official or investigator, he or she has the right to stop the interview at any time. In cooperating with government officials/investigators, the employee shall only provide information that they are authorized to release and/or to which they routinely have access.

Responsible Party: UNTHSC Faculty and Staff

2. The CRT has the following responsibilities:

- a. Review the documents presented by the investigators
- b. Obtain business cards from government officials. In lieu of business cards; ensure the full name, title, employing agency address, phone number and fax number are obtained.
- c. Identification of the lead/in-charge government official/investigator
- d. Interaction with government officials/investigators

- e. Management of all activities related to the area under investigation, to include (but not limited to):
 - i. Delegation of tasks
 - ii. Expenditures as required
 - iii. Control of areas under investigation
 - iv. Release of information related to investigation and confirmation that full disclosure of documents and data requested by the investigators, within the authorized scope of such investigation, is provided in a timely manner
 - v. Staffing decisions
 - vi. Protection of legal rights and privileges
 - vii. Maintaining a detailed log of all activities related to the investigation:
 - 1. Log/inventory any records, files or other property seized
 - 2. Copy all records, files seized
 - 3. Log/inventory any records, files etc deemed to be privileged and any objection made by the investigators
 - 4. The date and time the investigation was completed.
 - viii. Inventory of any records or assets confiscated
 - ix. Communication of activities to Senior Management and the Board of Regents

Responsible Party: UNT Health Compliance Response Team

References and Cross-references

03.101 Institutional Compliance policy

Forms and Tools (optional)

Approved: October 27, 2011

Effective: October 27, 2011

Revised: