

<p><b>UNIVERSITY</b> HEALTHCARE ALLIANCE</p>	<p style="text-align: right;"><b>Approval Date:</b> 1/29/13 <b>Revision Date:</b> <b>Approval Signature:</b> _____</p>
<p><b>Policy Name:</b> Responding to Inquires and Investigations from Regulatory Agencies <b>Policy Number:</b> CG-09 (Compliance General)</p>	<p style="text-align: right;"><b>Page 1 of 2</b></p>

**I. PURPOSE**

To ensure that University Health Care Alliance (“UHA”) appropriately responds and participates in all regulatory inspections, certifications and investigations performed by or on behalf of state and/or federal governmental agencies.

**II. POLICY STATEMENT**

It is the policy of UHA to ensure that all interactions with state and/or federal regulatory agencies occur in a prompt, appropriate and coordinated manner.

**III. SCOPE**

This policy applies to all of UHA.

**IV. PROCEDURES**

A. General. Local, state, federal or regional agencies or commissions may make inquiries of or investigate UHA to ensure compliance with applicable laws or regulations. Such inquiries may include requests for information, documents or other media, or to interview UHA personnel. These requests may come, for example, by subpoena, court order, letter, phone call or in person.

B. Responding to Inquiries.

1. Without exception, all such inquiries must be reported immediately (or as soon as possible) to the Office of General Counsel.
2. The Office of General Counsel will involve the appropriate staff, including the Director of Compliance, to coordinate a response on behalf of UHA.
3. All follow-up reports and other correspondence from UHA to such outside agencies must be submitted to the Office of General Counsel and approved prior to releasing them to the requesting agency.
4. If you receive a letter or phone call from a regulatory agency indicating that a scheduled visit will occur on a certain date in the future, promptly notify the Office of General Counsel.
5. If an inspector or regulatory agency representatives appear in your department or area without a UHA escort politely direct the person(s) to a waiting area or conference room away from patients and immediately obtain the following information:
  - a. Representative’s name and name of the agency by asking to see an official photo ID badge issued by that agency.

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- b. What kind of review, visit or investigation is being conducted.
  - c. Immediately notify:
    - i. Office of General Counsel
    - ii. Director of Compliance
6. In general, communications with such officials should be limited to gathering facts until the Office of General Counsel is notified. Be truthful and answer questions that you are knowledgeable about but do not guess or speculate if the topic is something that you are unsure about. Under no circumstances should you lie or falsely answer questions.