



## Standard Operating Policies – SOP # 11

### Visits/Interviews by the Government

<b>Title:</b>	<b>Visits/interviews by the Government</b>	<b>Effective Date:</b>	<b>12/08/2003</b>
<b>Author:</b>	<b>Chief Compliance Officer</b>	<b>Last Review Date:</b>	<b>12/01/2021</b>
<b>Location:</b>	<b>All Locations</b>	<b>Last Revision Date:</b>	<b>12/01/2021</b>
<b>Functional Area:</b>	<b>ADMINISTRATION</b>		

#### POLICY

Federal and state law enforcement and regulatory agencies routinely conduct interviews to gather information during audits, surveys, inquiries, investigations, and search warrants. Liberty Healthcare Corporation (Liberty) is committed to appropriately responding to, and not interfering with, any lawful audit, survey, inquiry or investigation. It is important that Liberty respond to any official requests for information consistently and appropriately. This policy provides guidelines for Workplace members about how to respond most appropriately to a site visit by government investigators, an official interview with government officials, and audits and/or search warrants.

#### PROCEDURE

1. **Response guidelines for routine visits to a Liberty program site.**

Notification of an impending visit by any government investigator or auditor should be immediately reported to the appropriate Contract Manager. Each Liberty facility/program must establish one senior management level individual, and a back-up individual, to serve as the Response Team Leader and assume primary responsibility for coordinating activities during government investigations, audits and/or surveys. Each facility/program is required to forward the names of the Response Team Leader and designated back-up to the Chief Compliance Officer (CCO). The on-site Response Team Leader ensures that a designated representative of Liberty management is always present during the site visit and is able to promptly contact the designated Liberty Contract Manager for assistance or to provide updated information. Government investigators and/or agents should not be left alone while waiting for the Response Team Leader because they have the legal right to proceed without permission from the team leader or anyone else. Employees must always remain courteous and professional when dealing with government investigators, surveyors or agents. If the Response Team Leader ascertains that the site visit is anything other than a routine periodic survey, the CCO and Corporate Legal Counsel must be contacted in addition to the Contract Manager.

2. **Non-routine visits to a Liberty facility/program site.**

- a. If an individual arrives at any Liberty facility or site and identifies himself or herself as a government auditor, surveyor, investigator or agent, staff must immediately contact the Response Team Leader or a senior manager on duty. The Response Team Leader or the senior manager on duty will ensure that the agent(s) is accompanied by Liberty staff at all times.
- b. If the senior manager on duty is NOT the Response Team Leader or back-up, then this individual will be contacted immediately.
- c. The Response Team Leader must obtain and document the name of the lead agent and the government agency he/she represents.

**Staff must not attempt to photocopy the credentials of the government agent because this is a violation of federal law.**

- d. The Response Team Leader must request the reason for the visit and examine any documents that the agent displays. This review of documentation should include expiration dates, any limits on the hours that the agent can visit the facility/site, and any signatures (or lack of signatures) on the authorization.

- e. If this is an unannounced inspection, official identification is required from all agencies. If there is any question about the authenticity of the site visit, designated staff must obtain verification from the home office of the official. The official should be logged in the guest registry, which would include full name, name of agency, purpose of visit, and time of visit.
- f. The Executive Director or designee will immediately contact the appropriate Contract Manager.
- g. If the reason for the visit pertains to any allegation of wrongdoing or any complaint, the Executive Director or designee will also contact the CCO and the Corporate Legal Counsel immediately.
- h. Workforce members should request the opportunity to obtain direction from Corporate Legal Counsel before submitting to questioning or an interview or providing documents or other information.

**Workforce members are not permitted to submit to questioning or an interview or provide documents or other information before consulting with Corporate Legal Counsel.**

Approved By: \_\_\_\_\_

### Revision History

Version	Date	Author	Summary of Changes
#1	12/08/2003	Judith Ann Shields	Initial ISF release – refactor and update of previous security policies into distinct documents
#2	08/20/2004	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#3	01/18/2005	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#4	12/22/2006	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#5	12/22/2007	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#6	12/22/2008	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#7	11/15/2009	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#8	8/20/2010	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#9	01/18/2011	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#10	12/22/2012	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#11	12/22/2013	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#12	12/22/2014	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#13	11/15/2015	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#14	08/20/2016	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement

#15	12/22/2017	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#16	12/22/2018	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#17	11/13/2019	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#18	11/03/2020	Judith Ann Shields	Annual review, Attorney reviewed © LHC, Author Title not name, Policy Title. Added inactivity lock requirement
#19	12/01/2021	John Beck	Annual review, minor changes. Added inactivity lock requirement