

Subject:	Responding to a Search Warrant or Governmental Subpoena
Endorsed By:	Compliance Committee
Approved By:	Compliance Committee, Board of Managers
DSRIP Implementation Deadline:	April 2015
Effective Date:	October 2015
Supersedes:	April 2015
Purpose:	This policy provides guidance to SI-PPS staff, contracted individuals, PPS Associates and Participating Providers regarding who to contact in response to a Search Warrant, Government Subpoena, etc.
Policy:	It is SI-PPS' policy to comply with the law and to cooperate with reasonable demands made during the course of a legitimate governmental investigation or inquiry. SI-PPS wishes to cooperate with these officials, in an orderly manner and in a way that does not violate any privileged or confidential relationship.
Procedure:	<ol style="list-style-type: none"> 1. If a PPS Associate receives a subpoena, civil investigative demand, summons or letter request for information or documents related to the DSRIP program and/or the New York State Medicaid program, the SI-PPS Compliance Officer must be contacted immediately, by calling 917-830-1161 and/or emailing rbergren@statenilandpps.org . 2. If any representative or law enforcement agency contacts a PPS Associate regarding anything related to SI-PPS and/or the DSRIP program, the SI-PPS Compliance Officer must be contacted immediately.

	<p>3. In no event may SI-PPS staff or PPS Associates respond to a request to disclose documents that are the property of SI-PPS without first speaking with the SI-PPS Compliance Officer.</p> <p>4. If a response is given to a request for information from government regulatory agencies, the response must be accurate and complete. It is SI-PPS' policy to comply with the law and to cooperate with reasonable demands made during the course of a legitimate governmental investigation or inquiry.</p> <p>5. SI-PPS staff/PPS Associates must preserve documents and not destroy or alter documents that are the subject of a government investigation. Such action will result in immediate termination and/or exclusion as well as possible criminal prosecution. SI-PPS staff/PPS Associates will take affirmative steps; if necessary, to ensure the preservation of documents that are the subject of any government inquiry.</p> <p>6. SI-PPS shall not prohibit individuals from speaking with government agents, but such individuals are under no legal obligation to answer questions asked by the government agents, and may choose to refrain from communicating with the agents unless required by law to do so. PPS Associates are entitled to representation by their own counsel if they desire. If a PPS Associate chooses to speak with the agents, he or she shall be careful that statements made to the agents are objective and accurate, not conjecture.</p>
Scope:	SI-PPS Associates (PPS Associates shall mean all individuals and entities that participate in or do business with SI-PPS, including but not limited to its employees, independent contractors, vendors, agents, suppliers, executives and governing body members) and Participating Providers where applicable.
Project(s):	
Regulatory Alignment:	
Reference(s):	
Attachment(s):	none

Reviewed/Revised by: Regina Bergren April 2016

Approved by Compliance Committee: August 2016

Partner Organization	Responsible Staff Name & Title	Date Reviewed	Signature