

Responding to Government Investigations

IF GOVERNMENT OFFICIALS COME TO A SITE

STEP 1: Gather information

- Tell the official(s) that you must follow our procedures.
- Ask to see credentials (badge or card).
- Gather information—write it down or make copies.

Information to gather from official(s):

- Official(s) full name, title, government agency, and direct phone number
- Time the official(s) arrived
- Why the official(s) states they are on site
- Warrants or other documents

STEP 2: Take time to review

- Tell the official(s) that you will need to call/forward their document to management.
- Ask if they will wait while you do so until you receive further guidance.
- Do not block or impede the official(s).

Talking points:

- "We ask for your patience, please know we are working with you, this may take some time"
- "Not sure how long it will take, I don't do this often so let me call them and tell you what I can"
- "These are the instructions I have been given"

STEP 3: Call management

- Call your supervisor or site director.
- Call SCHS General Counsel Shannon Jerse; she will assist you further and give you specific directions.

General guidance for visits to sites

- Always be polite and cordial. Be calm, courteous, and professional.
- Remember you are not alone—bring a supervisor, leader, or colleague into the interaction.

During

- Either Shannon Jerse or Nadia Simovic of the health system's legal department will advise you in real-time. You do not need to make any decisions.
- Avoid chatting, especially about our programs, clients, employees, or policies.
- Do not refuse a government official's order and do not physically block the official(s) from entering.

After

- Take detailed notes right away about what happened; be factual
- Provide a copy of your notes and documents to your supervisor.
- Submit an incident report.

IF GOVERNMENT OFFICIALS COME TO A SITE WHERE EMPLOYEES ARE WORKING

Connect government official(s) with correct site lead

- Employees should know/ask who the site lead is to direct the government official(s).
- Tell official(s) that you are not authorized to grant access but will connect them with the site lead.

Do not engage government official(s)

• Do not engage government official(s) yourself apart from directing them to the organization's contact person.

Notify your supervisor

• Let your supervisor know about the interaction with government official(s).

IF A REQUEST FOR INFORMATION IS RECEIVED

By mail or email

If you receive a subpoena or request for information, please call Shannon Jerse or Nadia Simovic for further instructions.

In person

If you receive a subpoena or request for information in person, follow the guidance shared in the section titled "If government officials come to a site."

Remember: Direct all requests for information or subpoenas to Shannon Jerse or Nadia Simovic.

IF THE MEDIA REACHES OUT TO YOU

If you receive a request from media for information, please forward it to Mary Rose Sullivan.

CONTACT INFORMATION:

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