

External Investigations, Inspections and Request for Information

Jill is busy working at her desk when she is approached by Allen Quist. Mr. Quist states that he is an official from the Office of Inspector General and he asks Jill to provide documents for a review that he is conducting at the Health Center.

How should Jill respond to Mr. Quist's request?

Jill should refer to the External Investigations, Inspections and Requests for Information policy (http://www.policies.uhc.edu/policies/policy_2009_04.pdf) which states the following:

- Any UConn Health faculty, staff, administrator, volunteer, or student contacted by an external investigator should immediately refer the investigator to the AAG and should provide the AAG with information regarding the external investigator's name, government affiliation, stated purpose of the visit (if provided) and planned arrival time or nature of requested information. Individuals may contact the UConn Health Operator at 860-679-2000 to contact the AAG. If the AAG is not available, request that Senior Counsel for Health Affairs be contacted.
- The AAG and/or Senior Counsel for Health Affairs will advise how to proceed and coordinate with management the UConn Health response, including designating an individual to act as liaison for the external audit activity or information request.
- Once the referral to UConn Health legal counsel is completed, the individual should inform their supervisor and/or on-call administrator, unless legal counsel determines there are legal reasons for not doing so. The supervisor and/or on-call administrator should in turn immediately provide this information to his or her department or division head.
- Individuals are not authorized to give the organization's documents to government investigators without approval through the appropriate administrative channels. Many such documents may be protected by HIPAA, FERPA or other privacy statutes and require redaction.
- Individuals must not change, move, alter, or destroy any records, including paper, tape, and electronic records that are the subject of any government investigation.