Corporate Compliance
Response to Governmental Investigations Policy

Purpose:

Federal and State law enforcement and regulatory agencies routinely conduct interviews to gather information during audits, inquiries, and investigations. It is important that DePaul (sometimes referred to as "Organization" or "the Organization") responds to any official requests for information consistently and appropriately. Therefore, this Policy is established to provide guidance on how to handle any unannounced visits by government representatives. This Policy does not address visits by regulatory agencies to perform program certification or quality assurance functions.

Policy:

It is the policy of DePaul to appropriately respond and not interfere with any lawful audit, inquiry, or investigation by a government agency.

Regulatory References:

N/A

Procedures:

1. Announcement of an impending visit by any government investigator or auditor should be immediately reported to the President, the Compliance Officer and Chief Legal Officer.

2. Employees will remain courteous and professional when dealing with investigators or agents.

3. Procedures for handling the receipt of a search warrant or subpoena are covered by separate policies. Please refer to specific policies.

I. ***Visits to any of DePaul's facilities:***

1. If an individual arrives at any DePaul facility and identifies themselves as a government auditor, investigator, or other representative, the individual (agent) will be treated with respect and courtesy. The receiving employee will request the reason for the visit. (Do not attempt to photocopy credentials, as this is a violation of Federal law).

2. The agent will be asked to wait in an unused office or a location where business is not conducted.

3. The staff member shall Immediately contact their Program Director who will contact the Vice President of their program or department. The Vice President of the Program or Department will notify the President, the Compliance Officer, and Chief Legal Officer. The President, Compliance Officer or Chief Legal Officer will identify one employee to be responsible for responding to the agent's questions.

4. Await direction from the President, Compliance Officer or Chief Legal Officer. Do not submit to questioning or an interview. Do not provide documents or other information at this point.

5. Refer to policy on Search Warrants, if applicable.

6. Other than providing information to direct the agents to information requested in the search warrant, do not submit to any form of questioning or interviewing.

II. ***Visits to any location outside DePaul (e.g., personal residence):***
Note: Employees and Board members are free to speak to government investigators or auditors; however, they are not required to submit to questioning. The following is provided as general information regarding off-site visits:

1. Individuals have the right to decline an interview or to postpone an interview until they have had an opportunity to seek legal counsel or other advice.

2. Employees and Board members who agree to be interviewed should always be truthful. If the party does not know the answer to a question, they should say so.

3. Employees and Board members should report any off-site visits by government agents, investigators, or auditors to their supervisor or the Chair of the Board of Directors. Supervisors must immediately report this to the Vice President of their program or department who will immediately notify the President, the Compliance Officer, and Chief Legal Officer. The Chair of the Board of Directors shall immediately notify the President, the Compliance Officer and Chief Legal Officer.

4. Refer to policy on Search Warrants, if applicable.

Sanction Statement:

Non-compliance with this policy may result in disciplinary action, up to and including termination.

Compliance Statement:

As part of its ongoing auditing and monitoring process in its Compliance Program, DePaul will review this policy based on changes in the law or regulations, as DePaul's practices change, and, at minimum, on an annual basis. Additionally, this policy will be tested for effectiveness on an annual basis or more frequently as identified in accordance with DePaul's Compliance Program. Testing will include but is not limited to ensuring that the policy is appropriately followed; the policy is effective; the policy has been disseminated to all Affected Individuals, who will also be notified of any updates or changes.

Tracking of the criteria above and results of this testing will be completed by the Compliance Officer, or designee. Additionally, results will be reported to the Compliance Committee and Governing Body on a regular basis.

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Record Retention Statement:

DePaul will retain this policy and all subsequent revisions, and any related documentation will be retained for a period of, at minimum, six years.