



Responding to Governmental Requests for Information

The business climate for healthcare organizations and providers is challenging at best, marked with increasing demands for information regarding patients and the services provided. Most requests are from predictable sources, such as, third party payers, patients, or their legal representatives. Release of information under HIPAA Security and Privacy mandates is permissible when related to the treatment, payment or organizational (TPO) needs of the organization. In the more complex situation where the requests originate from one of the many different branches of the federal or state government, the organizational response needs to be uniform and coordinated by all workforce members.

While visits by government investigators are not common, they have become a more frequent occurrence in recent years. Government investigators may arrive unannounced at the work places or the homes of present or former Saint Louis University employees. Although the University has no reason to believe that such an investigation is imminent, it is important that employees be familiar with the recommended course of action. This article will outline various scenarios an employee may encounter.

Take the following actions in the event investigators: 1) request information- verbal, written, electronic; 2) arrive unannounced at the workplace; 3) attempt to serve search warrants or subpoenas.

- Notify your immediate supervisor and the Office of the General Counsel (OGC), Medical Center Campus at 314-977-5767.
- Ask to see and make a copy of the investigator's agency identification card. Verify the name, agency affiliation, and business telephone number.
- Escort the investigator to a sequestered conference room to await the arrival of your supervisor and/or OGC representative.
- Verify the reason for the investigator's visit.
- Do not answer any questions of substantive nature. You may politely decline to answer these questions until the OGC representative arrives.
- If there is a subpoena or warrant to be served, respectfully inform the investigator that our procedure for responding is to immediately involve supervisory personnel and General Counsel.
- In all instances, be polite and courteous. Do not attempt to impede the investigator.
- If contacted at home, inform the investigator you would be happy to conduct the interview during work hours with SLU OGC personnel presence.



The employee's supervisor and University General Counsel will assist in securing the necessary information after the legitimacy of request is verified and evaluated.

At any time, an individual may register concerns relating to compliance University business or research matters to their supervisor, the Office of University Compliance, or the hotline at 1-877-525-KNOW (5669). The toll-free hotline is answered 24 hours a day, seven days of week by a company not directly affiliated with the University. Callers may remain anonymous and University policy protects against discrimination and retaliation for filing a report to the line. Additional information may be obtained from the Office of University Compliance at 314-977-5545.

If you have any comments or questions regarding the Compliance E-News please contact Lynn Monahan at monahanl@slu.edu