Employee Investigative Audit
Response Guidelines
Policy and Procedure
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Employee Investigative Audit Response Guidelines

Policy and Procedure

**Policy:** Any investigations regarding audits must follow OUHSC guidelines.

**Purpose:** The Employee Investigative Audit Response Guidelines policy and procedure are to ensure that:
- All audits are responded to in a timely fashion
- Any information given is given to personnel with the proper authorization to request it.
- The proper departments are involved in any investigation

**Scope:** HR, Assigned Departments, Employees
Employee Investigative Audit Response Guidelines Procedure

General
1. If law enforcement or government agents/auditors approach you or any of your staff for information, please follow the University Compliance and Quality Improvement Program, which the Board of Regents approved in 2002. The policy encourages appropriate cooperation and requires that you follow these steps:

   - Identification: Ask the investigator or auditor for identification and check it.
   - Two calls: Tell the investigator or auditor it is the University’s policy that you make two calls first:

     a) Call your supervisor. You may ask the investigator or auditor to talk to your supervisor.
     b) Call the Director of Compliance at 271-2511 or the Office of Legal Counsel at 271-2033.

2. You may ask the investigator or auditor to talk with the Director of Compliance or Legal Counsel.

3. You do not have to talk to the investigator or auditor if you do not want. The University is not instructing you not to talk to the investigator or auditor; however, you are not under any obligation to talk to them. Until it is determined who or what is the subject of the investigation or audit, as a matter of sound advice, it is usually not in an employee’s best interest to talk with an investigator or auditor without an attorney present. Simply tell the investigator or auditor that you want the interview to be terminated until an attorney is present.

Documents
1. You are not authorized to give University documents to the government. Any request for documents should be reported to the Office of Legal Counsel.

Search Warrants
1. If a government investigator presents a search warrant, you must allow the search to occur. However, you should follow the steps outlined above. In order to protect the University’s interests, it is crucial that your supervisor and the Office of Legal Counsel are notified immediately.

2. Further, before any search occurs, ask the investigator to make a copy of the search warrant. Make a log of all documents taken and attempt to obtain the investigator’s permission to copy the documents prior to their removal.
**Subpoena**
1. If an investigator presents a subpoena for documents, you do not have to provide the documents immediately.
2. Give the subpoena to your supervisor who will coordinate with the Office of Legal Counsel regarding the appropriate response to the subpoena.

You may access the full policy, including section 6.10, “Employee Response to Investigations/Audits” at [http://www.ouhsc.edu/compliance/complianceprogram.asp](http://www.ouhsc.edu/compliance/complianceprogram.asp)

If you have questions, please call Legal Counsel at 271-2033 or Director of Compliance Bobby Mason at 271-2511.

**Revision History**

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<th>Effective Date</th>
<th>Description of Changes</th>
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<td>1.0</td>
<td>9/1/2011</td>
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<td>Jesse Clark</td>
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<td>Jesse Clark</td>
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