

**Policy and Procedure: Corporate Compliance**  
**Topic: Response to Governmental Investigations**

**SCOPE OF POLICY**

This policy applies to all of The Center for Family Support (CFS) employees, including trainees, volunteers, consultants, contractors or subcontractors as well as The Board of Directors.

**STATEMENT OF PURPOSE**

Federal and state law enforcement and regulatory agencies routinely conduct interviews to gather information during audits, inquiries, and investigations. It is important that The Center for Family Support (CFS) responds to any official requests for information in a consistent and appropriate manner. Therefore, this policy is established to provide guidance on how to handle any announced unannounced visits by government representatives. This policy does not address visits by regulatory agencies to perform program certification or quality assurance functions.

**STATEMENT OF POLICY**

The Center for Family Support is committed to appropriately responding and not interfering with any lawful audit, inquiry, or investigation. All employees including trainees, volunteers, consultants, contractors or subcontractors as well as Board Members will remain courteous, cooperative and professional when dealing with investigators or agents.

**IMPLEMENTATION OF POLICY**

1. Any and all announcements of an impending visit by any government investigator or auditor should be immediately reported to the Executive Director, who is responsible to notify the Corporate Compliance Officer and legal counsel as warranted.
2. Procedures for handling the receipt of a search warrant or subpoena are covered by separate policies. Please refer to specific policies.

**A. Visits to any of the CFS facilities:**

1. If an individual arrives at any CFS facility and identifies himself or herself as a

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government auditor, investigator, or other representative, treat him or her with respect and courtesy. Request identification (do not attempt to photocopy credentials, as this is a violation of federal law) and the reason for the visit.

2. If possible, ask the individual to wait in an unused office or a location where business is not conducted.
3. Immediately contact the Program Director who will contact the Corporate Compliance Officer and the Executive Director or designee. The Executive Director will contact legal counsel as warranted and will identify Sr. Management staff for responding to the agent's questions.
4. Await direction from Executive Director and/or legal counsel. Do not provide documents or other information until authorized by Executive personnel and Corporate Compliance Officer.
5. Refer to policy on Search Warrants, if applicable.
6. Other than providing information to direct the agents to information requested, do not submit to any form of questioning or interviewing.

**B. Visits to any location outside CFS (e.g., personal residence):**

1. Employees should report any off-site visits by government agents, investigators, or auditors to the respective Sr. Director and the Executive Director. The Executive Director will notify the Corporate Compliance Officer and legal counsel as warranted and guidance will be provided to staff at that time.
2. Refer to policy on Search Warrants, if applicable.