



<b>Series</b>	Compliance	
<b>Policy Name</b>	<b>Search Warrant Compliance</b>	
<b>Policy Number</b>	<b>1505</b>	
<b>Origination Date</b>	11/1/2013;	<b>Reviewed: July 1, 2018</b>
<b>Regulation</b>	<b>N/A</b>	

### **Background/Purpose**

Criminal enforcement agencies increasingly have been using search warrants in addition to administrative and Federal Grand Jury subpoenas in health care fraud and abuse investigations. The movement away from use of subpoenas to this more intrusive tool results from their concern that key documents and computerized records may be compromised upon the presentation of written demands. A search warrant permits the government to enter the company's premises and seize records, computers, electronically stored data, and other evidence forthwith. In view of the serious legal implications of such an event, it is necessary to have a standing policy and procedure to ensure full compliance with the orders of the court, while at the same time protecting the privacy of individual employees and clients, along with other Communities Connected for Kids proprietary responsibilities.

### **Policy**

It is Communities Connected for Kids policy to provide for immediate notification to the General Counsel should any order of the Court, search warrant, or criminal subpoena be given to any staff person at any site or facility of the company. It is unlikely Counsel will be present, or reaches the locale in time to be present during the search and seizure. Therefore, it is important to establish a response plan to such an event, including a set of written internal procedures.

Any government agent bearing a search warrant, court order to search premises, and/or criminal subpoena is acting as an agent of the Court. It is Communities Connected for Kids policy that upon presentation of a search warrant by a government Agent, employees will:

- immediately notify the Communities Connected for Kids Chief Executive Officer who will call General Counsel and request that Agent to speak with General Counsel before proceeding to search the premises. If the Agent refuses, staff must permit agent to proceed.
- remain courteous and professional in dealing with agents and officers of the Court
- respond to their requests
- carefully note how the search is conducted
- supply a detailed written report to General Counsel



Approved: Carol DeLoach

Carol DeLoach, Chief Executive Officer

July 1, 2018