

**KING'S DAUGHTERS MEDICAL CENTER**

**AUDIT, COMPLIANCE &  
ETHICS PROGRAM POLICY**

**POLICY AND PROCEDURE**

**EFFECTIVE DATE: June 21,  
2012**

**REVIEWED DATE: December  
17, 2013**

**SUPERSEDES POLICY DATED:  
August 1, 2011**

**FILE: SECTION A (8)**

**SUBJECT: SUBPOENA POLICY**

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**POLICY:** In the event a government document request or formal subpoena is served upon the Medical Center, the General Counsel or Compliance Officer shall direct the immediate preservation and safeguarding of any and all records, paper and electronic, which in any way appear to be relevant to that document request or subpoena. The General Counsel or Compliance Officer will designate a responsible employee to track and maintain the custody of such records and relevant employees will be informed and instructed to follow strict preservation and safeguarding procedures as listed below.

**PROCEDURE:**

1. Preservation and safeguarding procedures:
  - A. Immediate suspension of any and all document and records destruction efforts.
  - B. Immediate notification to management and responsible employees of the suspension of any and all destruction efforts.
  - C. Organized retrieval and collection of relevant documents and records that could be responsive to the document request or subpoena.
  - D. Secure storage of all relevant documents and records that could be responsive to the document request or subpoena.
  - E. Relevant documents include, but are not limited to, any and all paper and electronic documents or records.

- F. All collected documents and records are to be maintained under the exclusive control of the designated responsible employee, Compliance Officer, or General Counsel.
- G. No documents or records are to be released or shared with any management or employee except upon express permission of the Compliance Officer or General Counsel.
- H. Any information from or concerning documents and records retained and stored are strictly confidential and not to be disclosed except by express permission by the Compliance Officer or General Counsel.

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Vice President/Chief Legal & Regulatory Officer