

# NWF Health Network Policy & Procedure

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<b>Series:</b>	800: Performance & Quality Management	
<b>Policy Name:</b>	Participation in Governmental or Tribal Inquiries, Reviews, Audits, and Investigations	
<b>Policy Number:</b>	816	
<b>Origination Date:</b>	2/26/2026	
<b>Referenced:</b>	CH 415 F.S. CH 285, F.S. CH 39, F.S. CH 20.055, F.S. CFOP 180-04 CFOP 180-02	CFOP 170-16 CH 5 CFOP 170-5 CH 28 NWFHN 1100-1100 NWFHN 1100-1113 NWFHN 1100-1124 NWFHN 1500-1502

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## Purpose

Northwest Florida Health Network (NWFHN) is committed to upholding transparency, accountability, and full legal compliance when responding to governmental or tribal inquiries, reviews, audits, or investigations. This policy establishes expectations and procedures for NWFHN employees, affiliates, and partners to ensure consistent cooperation and ethical conduct in all activities.

## Policy Statement

NWFHN will fully cooperate with governmental and tribal authorities in accordance with all applicable laws, regulations, and contractual requirements. The organization is committed to maintaining the integrity of its programs and operations by proactively identifying risks, supporting continuous improvement, and engaging constructively with governmental and tribal inquiries, reviews, audits, or investigations.

The Director of Quality & Professional Development, or their designee, is responsible for ensuring that all inquiries, reviews, audits, and investigations are documented appropriately. Documentation will be used to support compliance monitoring, identify systemic issues, and inform ongoing training and professional development. The outcomes and associated findings of such activities will be reviewed quarterly to evaluate trends and improvement opportunities.

## Scope

This policy applies to all individuals and entities associated with NWFHN, including:

- Employees
- Members of the Board of Directors
- Interns and Volunteers
- Contractors, Subcontractors, and Business Agreement Partners
- Business Associates and Affiliates

All covered parties shall adhere to this policy and actively support NWFHN's commitment to ethical, lawful governance and collaboration with governmental and tribal bodies. Completion of annual training on this policy is mandatory as part of NWFHN's compliance and professional development program.

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## Definitions

- **After-Action Review:** A structured assessment conducted following an inquiry, review, audit, or investigation to capture lessons learned, identify training needs, and determine opportunities for organizational improvement.
- **Inquiry:** A request for information.
  - *Note:* Public records inquiries involving NWFHN records must be directed to the NWFHN Public Records Custodian.
- **Investigation:** A formal and systematic process undertaken to gather facts, evidence, or information to address an allegation, concern, or regulatory matter.
- **Review:** A thorough assessment or evaluation intended to confirm compliance, determine performance, or identify needed improvements.
- **Audit:** A documented, independent evaluation that determines whether specific criteria—such as policies, procedures, or standards—are being met. Audits may address financial, operational, compliance, or quality assurance activities.
- **Governmental Entity:** Any organization or body established, funded, or operated by a federal, state, or local government to perform public, regulatory, or oversight functions.
- **Tribal Entity:** The legal authority of Native American or Alaska Native tribes to self-govern within their jurisdictions, as established by sovereignty, federal law, treaties, and relevant court decisions.
- **Immediate:** A required action or response that is continuous and available 24 hours a day, seven days a week, 365 days a year, including weekends, holidays, and after business hours. “Immediate” indicates no delay, interruption, or deferral in response or availability.

## Procedure

### A. Reporting Requirements

1. Any NWFHN employee or affiliate who becomes aware they are subject to a governmental or tribal inquiry, review, audit, or investigation must immediately notify their supervisor or the appropriate chain of supervisory command.
2. If an individual is arrested by any entity worldwide, they must notify their supervisor or chain of command immediately.
  - The reporting individual must obtain confirmation of receipt when notification is made through any method other than direct verbal communication.
  - Supervisors must acknowledge receipt once reviewed and accepted.
  - Supervisors are responsible for ensuring the event is logged in the Quality and Risk Event Log for monitoring and follow-up.
3. Supervisors, Chain of Command, or Case Management Organization (CMO) leadership must escalate and notify the NWFHN Chief Operating Officer (COO) immediately.

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4. When a request is received through NWFHN Client Relations or another point of entry, the recipient must notify the COO immediately upon review.
5. The COO will notify the Chief Executive Officer (CEO) as appropriate.
6. Client Relations and Quality Assurance will ensure all internal tracking and reporting requirements are completed.

## **B. Initial Risk Assessment**

1. The NWFHN COO or designee will assess:
  - The nature and severity of allegations;
  - The individual's access to vulnerable populations; and
  - The potential impact on service delivery and operations.
2. The COO may consult with other leaders or designate additional personnel to assist in managing the inquiry, review, audit, or investigation at their sole discretion.

## **C. Notification, Verification, and Coordination with Governmental or Tribal Entities**

1. Some inquiries may originate from elected or appointed officials or agencies, such as the state legislature.
2. The COO or designee will contact the applicable entity to verify the request and ensure coordination as authorized by law. Engagement must:
  - Protect the integrity of the inquiry, review, audit, or investigation;
  - Avoid impeding or obstructing investigative processes;
  - Respect the roles of all involved parties;
  - Promote effective communication and collaboration; and
  - Confirm the legal authority of the requesting entity while maintaining compliance with confidentiality and privacy laws.

## **D. Administrative Actions**

1. As appropriate, administrative actions may include but are not limited to:
  - Placement on administrative leave (with or without pay);
  - Temporary reassignment or restricted duties;
  - Personnel or contractual actions, up to termination of employment or partnership; and
  - Restriction or suspension of access to business systems (e.g., FSFN, Landrum).
2. If an employee or affiliate is involved in a DCF investigation or special conditions referral related to alleged child abuse, neglect, abandonment, or special conditions; or if an employee or affiliate is involved in a DCF investigation related to vulnerable adult alleged abuse, neglect, or exploitation:
  - In Florida, the related case should be restricted within the Florida Safe Families Network (FSFN) or state system of record by the Florida Abuse Hotline, the assigned Investigator,

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or the System Security Officer as governed by DCF's Children and Families Operating Procedures (CFOP).

- An immediate assessment will determine whether the individual's access to any system should be suspended or terminated.
  - Individuals are strictly prohibited from accessing or directing others to access any system outside of authorized use. Violations may result in disciplinary action, including termination, and may carry civil or criminal penalties.
3. If falsification of information or willful omission is alleged:
- All system access must be immediately suspended.
  - For child protection personnel, an immediate review of current and recent cases must be performed by the relevant Case Management Organization (CMO).
  - A desk review must be completed by the third business day by the CMO.
  - A face-to-face child safety assessment by the CMO must occur immediately for all open cases assigned to the employee alleged; this includes all cases that are open and that the alleged employee has completed any activity on. E.g., primary, secondary, out-of-county etc.
  - When a face-to-face child safety assessment cannot be completed immediately due to the child being unavailable for any reason, daily diligent attempts to complete a face-to-face visit by the CMO shall occur.
  - The individual must have no contact with consumers pending review.
  - By the fourth business day, CMO leadership must provide a written summary of findings and progress to the NWFHN COO or designee.
  - If new concerns arise, CMO must follow statutory notification and reporting requirements as outlined by DCF or equivalent authorities.
  - CMO must notify the Florida Certification Board (FCB) when applicable and confirm this to NWFHN by the fourth business day.
  - CMO leadership must provide timely cooperation and documentation as requested by NWFHN, DCF, or the Office of Inspector General (OIG).

## **E. Cooperation with Authorities**

1. Full cooperation with NWFHN, governmental, and tribal agencies, including, but not limited to, DCF and OIG, is mandatory as required by law and/or employment/contractual/business agreements.
2. Employees and affiliates must respond truthfully, accurately, and promptly to all authorized requests.

## **F. Confidentiality and Non-Retaliation**

1. All proceedings are confidential unless disclosure is authorized by law or regulation. Certain information may be considered public record under applicable statutes.

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2. Retaliation against anyone participating in or reporting an inquiry, review, audit, or investigation is strictly prohibited.

## **G. Resolution and Follow-Up**

1. Resolution and follow-up are directed by the NWFHN COO or designee.
2. When inquiries are received via Client Relations, the COO will determine whether final correspondence will be sent directly by the COO, designee, or through Client Relations.
3. Notification to the Florida Certification Board (FCB) will occur as applicable and as provided in this procedure.
  - *Note:* The FCB operates independently from NWFHN and its partners under Rule 65D-30, F.A.C., and Florida Statutes. NWFHN does not initiate or determine FCB disciplinary or certification actions.
4. The COO or designee will determine appropriate follow-up actions, which may include disciplinary measures, policy or procedural updates, contractual changes, sanctions, corrective actions, or termination of partnerships. The COO may consult Human Resources, General Counsel, CFO, CEO, and other relevant leadership or entities at their discretion.

## **H. After-Action Review and Continuous Improvement**

1. Upon closure of any inquiry, review, audit, or investigation, the COO and Regional Program Administrator will consult with the Director of Quality & Professional Development, as applicable and as determined by the COO, for an After-Action Review to evaluate policy compliance, timeliness, training needs, and systemic risks. Findings will be incorporated into the Performance and Quality Improvement (PQI) reporting cycle and presented to the Quality and Risk Committee for continuous improvement.
2. Disposition information of any inquiry, review, audit, or investigation shall be included in alleged employee or affiliates human resources file or contract file with NWFHN.
3. All affiliates shall require the same disposition documentation their specific organization's human resources and/or personnel or contract files.