

**ADDENDUM A**  
**INTEGRITY COMMITTEE ACCESS**  
**INTEGRITY COMMITTEE POLICIES AND PROCEDURES 2018**

**Effective Date: March 25, 2021**

A. IC Access to OIG Information; Authorized Person. Upon request by the IC under section 7(B) or 7(C) of these Policies, an IG or other person with full and final authority to provide access under this section (Authorized Person) must provide and direct the staff of the OIG to provide the IC or its designated investigators with full and timely access to all OIG records, documents, witnesses, and other information that the IC or its designee deems necessary to carry out the IC's duties and responsibilities under section 11(d) of the IG Act. In reviewing or investigating an allegation of wrongdoing against a Covered Person in a particular OIG, the IC shall have access to OIG records, documents, witnesses, and other information to the same extent, and under the same terms, that section 6 of the IG Act provides each IG with such access with respect to its establishment. Any Authorized Person shall be considered to be a Covered Person pursuant to section 2(D) of these Policies.

B. IC Requests for Assistance – Other Entities and Agencies. Upon request, an OIG, including the IG, Authorized Person, and its senior leadership, will assist the IC or its designated investigators in obtaining records, documents, witnesses, or information from any establishment, entity, or agency. An OIG, including the IG, Authorized Person, and its senior leadership will, upon request, assist the IC in resolving any disputes arising from any such requests.

C. Availability of IC Working Group. An IG or Authorized Person who believes that providing the IC with access to OIG records, documents, witnesses, or other information may be prohibited by law may contact the IC Working Group to discuss appropriate measures to facilitate access.

D. Confidentiality and Privileges. The IC does not consider the provision by an OIG of access to OIG records, documents, witnesses, or other information to constitute a waiver of any applicable privilege or similar doctrine as to third parties. The IC will take appropriate measures to protect the confidentiality of records, documents, information, or witness statements as to which the OIG informs the IC that it claims a privilege or other protection from disclosure as to third parties, including where necessary the redaction of information from IC reports.

E. Failure to Cooperate with IC. Pursuant to section 7(C) of these Policies, if an IG or Authorized Person fails to respond fully and in a timely fashion to an IC request for OIG records, documents, witnesses, or other information, the IC may make an independent finding of wrongdoing against such IG or Authorized Person for failure to cooperate in the IC investigation, either as part of its findings, conclusions, and recommendations regarding the underlying investigation or in a separate report. If the IC makes such a finding for failure to cooperate, then the IC will provide the affected IG or Authorized Person the opportunity to comment on the report, as reflected in section 10 of these Policies.