



PRC-ALL-019: Responding to Law Enforcement & Government Requests

(Requirement Reference: HIPAA 45 CFR §164.512(f), Minn. Stat. §144.293, §245I.05)

1. Policy Statement

Minnesota Mental Health Clinics (MMHC) maintains a standing, organization-wide policy to guide staff responses to any visit, inquiry, or request made by law enforcement or other government agents. This policy reflects MMHC's long-established standards of conduct, regardless of external events, and applies uniformly across all departments, programs, and physical sites.

This policy exists to:

- Ensure legal compliance with client privacy standards under HIPAA and Minnesota law.
- Prevent unauthorized disclosure or access to protected health or organizational information.
- Protect staff from being placed in unauthorized or high-liability positions.
- Promote a consistent, professional, and safe response regardless of the agency, rank, or jurisdiction of the requesting authority.

2. Policy Requirements

A. Universal Response Expectation

All MMHC staff must respond to law enforcement or government agents with a consistent and professional approach, regardless of the agent's title, agency, or demeanor.

B. No Staff Member Shall Speak on Behalf of MMHC

Staff are not authorized to:

- Provide verbal or written information about clients, staff, records, or operations.
- Interpret or explain MMHC policies.
- Accept or acknowledge legal documents.
- Permit access to any person, room, system, or file.

C. Permitted Staff Response

Staff may:

- Maintain a neutral, non-confrontational demeanor.

State only:

"MMHC has a standard protocol for requests like this. I will contact the appropriate person immediately."

- Then initiate contact with one of the designated response leads.

D. Designated Contact List

All law enforcement or government requests must be escalated immediately to one of the following leadership personnel:

Kristin Hoen – Senior Director of Operations

Phone: 612-719-5265

Email: khoen@mnmentalhealth.com

Ben Thompson – Director of Quality Assurance & Compliance

Phone: 612-481-7923

Email: bthompson@mnmentalhealth.com

Karen Levinskas – Human Resources Manager

Phone: 763-228-9645

Email: klevinskas@mnmentalhealth.com

If none of the above individuals are immediately available, staff must escalate directly to:

John Doyle – President/Chief Executive Officer (CEO)

Phone: 651-395-5764

Email: jdoyle@mnmentalhealth.com

Even when one of the primary contacts is successfully reached, they are required to inform and debrief the President/CEO as part of standard follow-up. The President/CEO must be made aware of all enforcement-related encounters.

E. Client and Staff Privacy

Staff must not:

- Confirm or deny the presence or status of any client or staff member.
- Reveal appointment schedules, employee whereabouts, or clinical information.
- Allow access to files, rooms, or systems without leadership approval.

F. Legal Instruments

If law enforcement presents a warrant, subpoena, or other legal document:

- Staff must not accept or review the document.
- Notify a designated contact immediately to validate and respond.

G. Threat or Emergency Situations

If the agent poses a direct threat to safety, staff must follow MMHC's "Emergency Procedures and Behavioral Crisis Protocol" and contact 911 if needed.

3. Training and Acknowledgment

This policy is incorporated into all new hire onboarding and annual refresher training.

Site leads must review the policy annually with all staff and confirm acknowledgment via signed receipt or electronic tracking.