BUILDING AN EFFECTIVE INVESTIGATIVE TEAM

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Presenters
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Ensemble Health Partners
INTERNAL INVESTIGATION PRIORITIES

The Three “V’s”

- Valuable
  - Reliable
  - Objective
  - Prompt
  - Consistent
  - Defensible

- Variable
  - Adaptable to varying organizational sizes, structures and resources
  - Accommodates varying subjects
  - Responsive to environmental changes

- Visible
  - Leadership, executive, and management involvement and interaction
  - Demonstrable value
  - Reporters/victims are heard; minimize risk of whistleblowers
Investigation Essentials

1

ASSESSING YOUR CURRENT PROGRAM
Identifying resources and asking questions
**ASKING THE RIGHT QUESTIONS**

<table>
<thead>
<tr>
<th>Current process</th>
<th>Investigators</th>
<th>Reporting System</th>
</tr>
</thead>
<tbody>
<tr>
<td>What is the investigative process in place right now?</td>
<td>Who is conducting investigations now?</td>
<td>How are issues reported?</td>
</tr>
<tr>
<td>What are the weaknesses and strengths?</td>
<td>What are their credentials?</td>
<td>Is the reporting system reliable, effective, objective?</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Policies</th>
<th>Collaborators</th>
<th>Resources</th>
</tr>
</thead>
<tbody>
<tr>
<td>What policies refer to investigations?</td>
<td>Who are your subject matter experts?</td>
<td>What are your financial, human and technical resources?</td>
</tr>
<tr>
<td>Who has access to these policies?</td>
<td>Who are the organizational partners/clients?</td>
<td>What are your third party resources?</td>
</tr>
</tbody>
</table>

**ASSIMILATING THE INFORMATION**

Prepare an investigations workplan with measurable targets from the date of report to 6 months and beyond

Variable, Visible

Variable, Valuable
2

Defining your scope of work
Using your work plan to determine what your role is, and what it is not

Role Definition

Investigator
- Receives/reviews the report
- Identifies pertinent policies
- Conducts investigation
- Reports findings and may make recommendations

Variable, Valuable, Visible

Leader/Client
- Reviews the findings
- Makes disciplinary decisions
- Assigns mitigation (e.g. monitoring, education) to appropriate parties
ACCOUNTABILITY FOR INVESTIGATIONS

Investigations Director  Chief Risk Officer  CEO/President  Board of Directors

INVESTIGATIVE TEAM ROLES

LEAD INVESTIGATOR
- Triage new reports
- Assignment to appropriate investigator
- Monitor investigation for progress and deadlines
- Lead investigation when necessary
- Ensure completed investigation meets documentation standards
- Communicates/consults with Director of Investigations
- Reviews work of investigator before completion

INVESTIGATOR
- Determine appropriate investigative process
- May be the Lead Investigator
- Assemble relevant policies
- Interview participants
- Gather evidence
- Draft investigative report
- Communicates/consults with Lead Investigator

Variable, Valuable, Visible
3

Building the team
Making best use of your human resources

Identifying Candidates
BASIC TRAINING

- Elements of an investigation
- Conducting interviews
- Overcoming bias
- Report writing
- Organization of specific topics
- Determining witness credibility

CONTINUING EDUCATION

Plan for consistent on-going training and feedback
IDENTIFY RESOURCES AND EXPERTS

Legal Counsel
What is the role and expected involvement of legal counsel?
What are the weaknesses and strengths?

Medical Staff
Who are your medical staff liaisons?
What is their role?
What is the peer review process?

Vendor Contracts
Who owns vendor contracts?
Where are contracts stored?
What is the recourse for violations?

Quality/Risk
Who are your partners?
When do they become involved in an investigation?
When does a claim need to be filed?

Human Resources
When does HR enter the investigation?
When do investigations get referred for disposition?

Auditors
Who are the audit partners?
Are there audit resources that can be leveraged for an investigation?
When does an investigation become an audit?

Variable, Valuable, Visible

Assembling the Tools
Giving your team all the right resources
REPORTING SYSTEM

- Accessible 24/7
- Objective Third Party Management
- User friendly

INVESTIGATIONS DATABASE

- Meets organizational needs for various investigation types
- User friendly and adaptable
- Maintenance and reporting features
- Analytics and trending capabilities
DATA AND METRICS

Move From Anecdotal to Data Driven

- Assess state of the organization
- Identify trends and hotspots
- Predictive/proactive analytics

STANDARD REPORT TEMPLATE

COMPREHENSIVE
- Executive summary
- Timeline
- Policies and Regulations
- Analysis
- Findings and Recommendations

ACCESSIBLE
- Easily digestible
- Who, what where and when are evident
- Findings and recommendations are clearly identified and communicated

CONSISTENT
- Key communication vehicle
- Standard template
- Promotes consistent investigation methodology

Valuable, Visible
Assemble library of current policies, procedures, state and federal regulations, agency guidance, white papers, internal memos and more

Variable, Value

Communication Plan
Proactively establishing and maintaining effectiveness
CONSCIOUS COMMUNICATION
PLANNING

Before the Investigation Begins
- Organizational Buy-In
- Building Awareness

Investigation In Process
- Periodic updates
- Demonstrate value

At the conclusion
- Standardize report process
- Debrief with leadership

Variable, Valuable, Visible

Customize your Program
QUESTIONS?

Thank you!