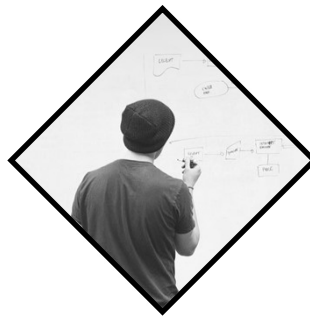


BUILDING AN EFFECTIVE INVESTIGATIVE TEAM

November 4, 2019

1



Presenters

Mike Sandulak

Director of Investigations
Providence St. Joseph Health

Tamra Smith

Lead Investigator, Principle Compliance Specialist
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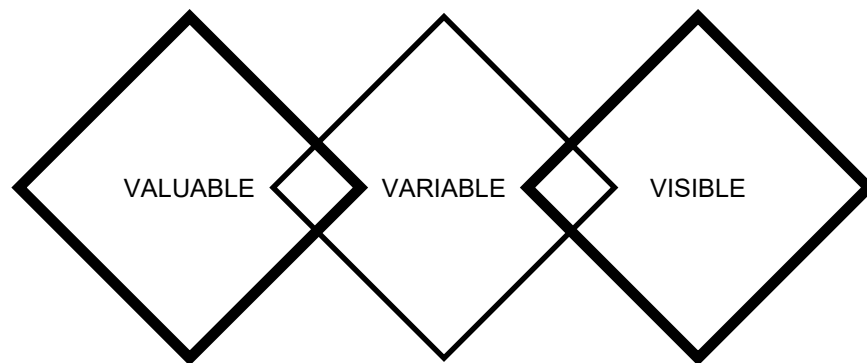
Chief Compliance Officer
Ensemble Health Partners

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INTERNAL INVESTIGATION PRIORITIES



The Three "V's"

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MEETING INVESTIGATIVE OBJECTIVES

Valuable

- Reliable
- Objective
- Prompt
- Consistent
- Defensible

Variable

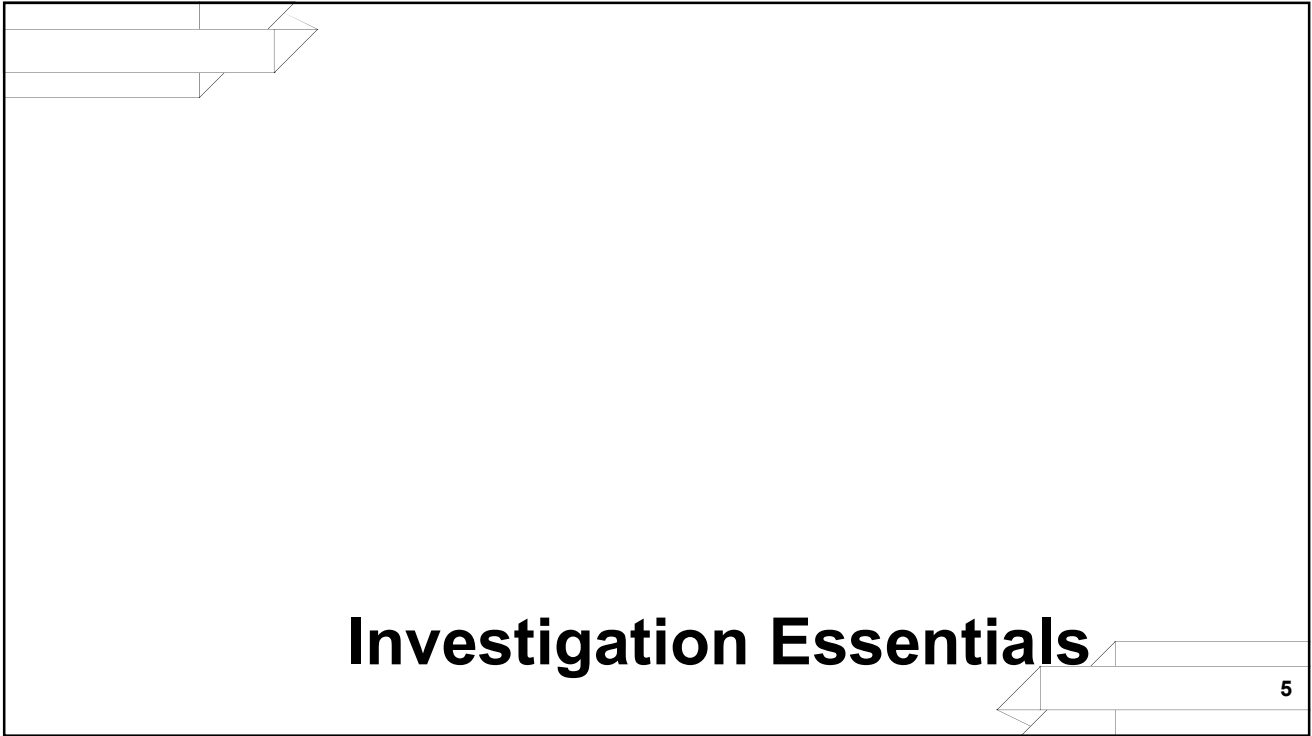
- Adaptable to varying organizational sizes, structures and resources
- Accomodates varying subjects
- Responsive to environmental changes

Visible

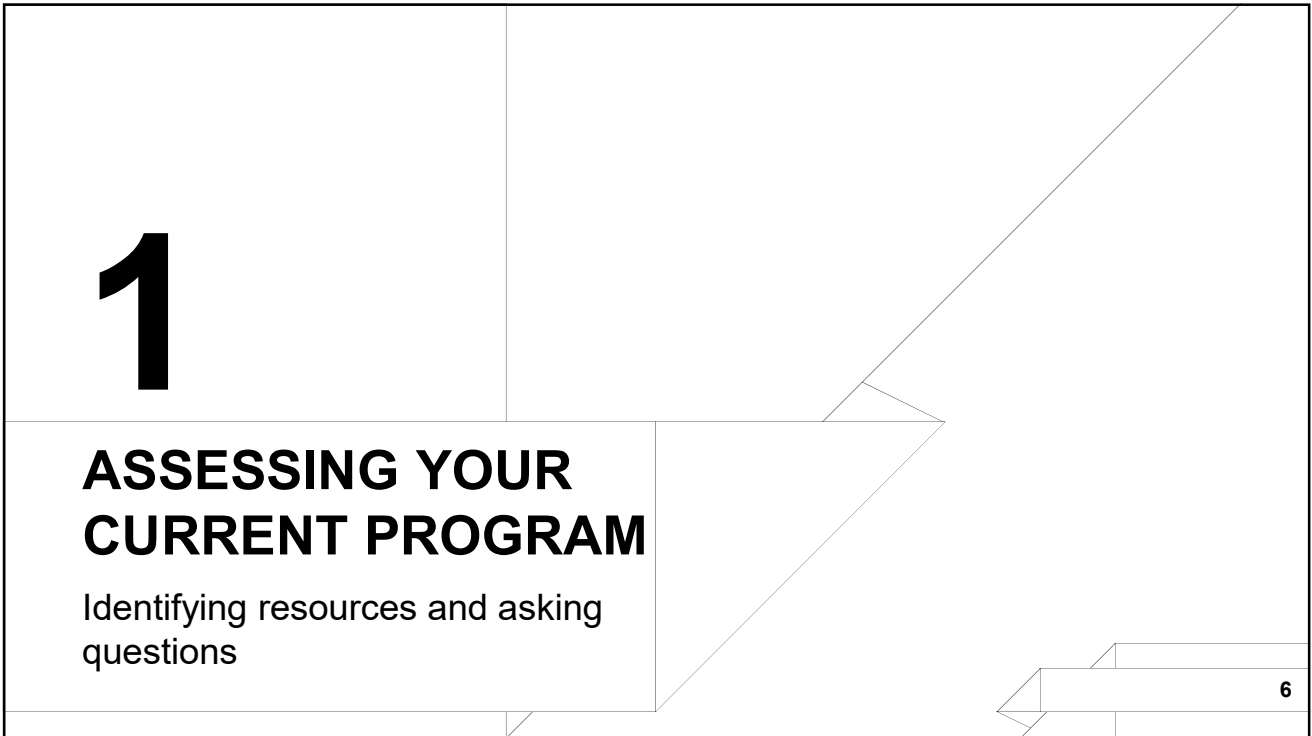
- Leadership, executive, and management involvement and interaction
- Demonstrable value
- Reporters/victims are heard; minimize risk of whistleblowers

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5



6



ASKING THE RIGHT QUESTIONS

Current process

What is the investigative process in place right now?

What are the weaknesses and strengths?

Policies

What policies refer to investigations?

Who has access to these policies?

Investigators

Who is conducting investigations now?

What are their credentials?.

Collaborators

Who are your subject matter experts?

Who are the organizational partners/clients?

Reporting System

How are issues reported?

Is the reporting system reliable, effective, objective?

Is it visible?

Resources

What are your financial, human and technical resources?

What are your third party resources?

Variable, Visible

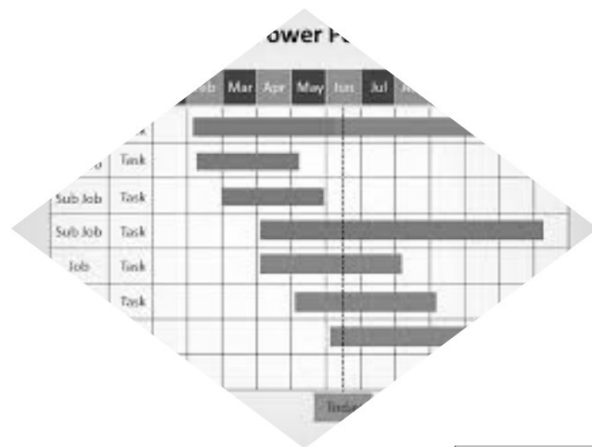
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ASSIMILATING THE INFORMATION

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



Variable, Valuable

8

8

2

Defining your scope of work

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

9

9



Role Definition

Investigator

- Recieves/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 (eg. monitoring, education) to appropriate parties

10

10



ACCOUNTABILITY FOR INVESTIGATIONS

Investigations
Director

Chief Risk
Officer

CEO/
President

Board of
Directors

Valuable, Variable, Visible

11

11



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

12

12

3

Building the team

Making best use of your human resources

13

13

Identifying Candidates

14

14



BASIC TRAINING

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

Valuable, Variable

15

15



CONTINUING EDUCATION

Plan for consistent on-going training and feedback



Variable, Valuable

16

16



IDENTIFY RESOURCES AND EXPERTS

Legal Counsel

What the role and expected involvement of legal counsel?

What are the weaknesses and strengths?

Medical Staff

Who are you medical staff liaisons?

What is their role?

What is the peer review proces?

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

17

17

4

Assembling the Tools

Giving your team all the right resources

18

18



REPORTING SYSTEM

■ Accessible
24/7

■ Objective
Third Party
Management

■ User friendly



Valuable, Visible

19

19



INVESTIGATIONS DATABASE



■ Meets
organizational
needs for
various
investigation
types

■ User friendly
and adaptable

■ Maintenance
and reporting
features

■ Analytics and
trending
capabilities

Valuable

20

20



DATA AND METRICS

Move From Anecdotal to Data Driven

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

Valuable

21

21



STANADARD 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

22

22



RESOURCE LIBRARY

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



Variable, Value

23

23

5

Communication Plan

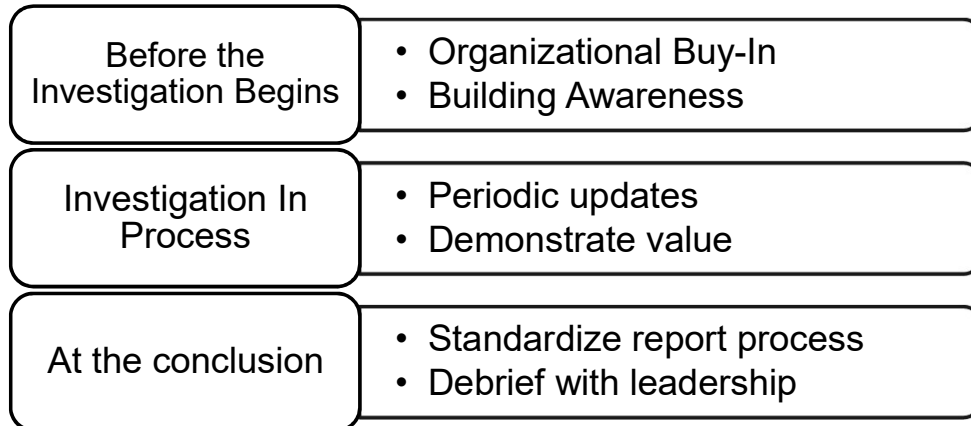
Proactively establishing and maintaining effectiveness

24

24



CONSCIOUS COMMUNICATION PLANNING



Variable, Valuable, Visible

25

25

Customize your Program

26

26

QUESTIONS?

Thank you!