BUILDING AN EFFECTIVE INVESTIGATIVE TEAM

Presenters

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**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

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ASSESSING YOUR CURRENT PROGRAM

Identifying resources and asking questions
**ASKING THE RIGHT QUESTIONS**

**Current process**
- What is the investigative process in place right now?
- What are the weaknesses and strengths?

**Investigators**
- Who is conducting investigations now?
- What are their credentials?

**Reporting System**
- How are issues reported?
- Is the reporting system reliable, effective, objective?
- Is it visible?

**Policies**
- What policies refer to investigations?
- Who has access to these policies?

**Collaborators**
- Who are your subject matter experts?
- Who are the organizational partners/clients?

**Resources**
- What are your financial, human and technical resources?
- What are your third party resources?

**ASSIMILATING THE INFORMATION**

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

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

*Variable, Valuable, Visible*
ACCOUNTABILITY FOR INVESTIGATIONS

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
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 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 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

Valuable, Visible

Valuable
DATA AND METRICS

Move From Anecdotal to Data Driven

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

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
RESOURCES LIBRARY

Assemble library of current polices, 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!