Internal Investigations
Process & Guidelines

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Overview of Presentation

- Objectives
- Reporting Mechanisms
- Assignment of Priorities & Personnel
- Investigation Interviews
- Investigation Analysis
- Decision, Reports, Action
- Participation
- Discussion
OBJECTIVES

- Full Compliance with Laws, Rules and Policies
  - Ensure all allegations/issues are monitored and managed
  - These are processing guidelines
- The Civil Rights Model is the basis for these guidelines
- Integrity and Trust
  - Investigations are Confidential (complaint is not shared)
- Confidence that there is Zero Tolerance for Retaliation:
  - Personnel
  - Students
  - Vendors

Objective is to be Proactive about RU Culture and Integrity
Reporting Mechanisms

Hotline
855-431-9967
Preferred Method

Web
www.rowan.alertline.com

Direct Intake

All three methods monitored through Global Hotline Systems
Assignment of Priorities and Personnel

- Who gets the assignment?
  - Medical Compliance
  - Title IX
  - Discrimination and Workplace
  - Labor/Union
  - Student Judicial
  - Conflicts
  - External Resources

- Speed/Priority
- Deadlines for Completion
Investigation Interviews

**STEPS**

- Confidential Interview with Complainant
  - Investigation Process included with Invite
- Confidential Interviews with Witnesses and Respondent(s)
  - Order Determined by the Investigator
- Provide Complainant and Respondents with a copy of Applicable Policy
- Review with Interviewee:
  - Confidentiality Statement
  - Investigator’s Role
  - Ground Rules
  - Allegations
  - Expectations
- Gather and Record
  - Facts
  - Other Sources of Information
  - Witnessed Behaviors
Investigation Analysis

- Review Information Gathered
- Follow-up Interview(s) of Complainant and/or Respondent
- Review & Analyze Law/Rule/Policy
- Violation Determination
  - Substantiated
  - Unsubstantiated
  - Inconclusive
Participation

- Employees obligated to report
- Full Cooperation Expected
- Protection from Reprisal/Retaliation
  - Retaliation/Whistleblower Protections
- Correction Action Plan (CAP) or Discipline

RU = Zero Tolerance (means we take complaints seriously and will look into them)
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<thead>
<tr>
<th><strong>Communication</strong></th>
<th><strong>Reports-Actions</strong></th>
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<tbody>
<tr>
<td>Respondent notified of determination of investigation</td>
<td>Corrective Action Plan (CAP) may be required</td>
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<td>Complainant notified of result, in brief</td>
<td>Discipline-referred to Labor Relations</td>
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<td>Supervisor(s) advised/notified as necessary</td>
<td>Legal Enforcement for Substantiated Criminal Behavior</td>
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<td>Formal personnel file copied as appropriate</td>
<td>Audit Committee advised by type of claim</td>
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<td>Labor relations and Legal counsel notified as appropriate</td>
<td>Community reports issued every term</td>
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Questions