

Internal Investigations Process & Guidelines

Ray Braeunig, CHC, CHPC, CHRC
Chief Audit, Compliance & Privacy Officer
Rowan University

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



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)

Communication, Reports, Actions

Communication	Reports-Actions
Respondent notified of determination of investigation	Corrective Action Plan (CAP) may be required
Complainant notified of result, in brief	Discipline-referred to Labor Relations
Supervisor(s) advised/notified as necessary	Legal Enforcement for Substantiated Criminal Behavior
Formal personnel file copied as appropriate	Audit Committee advised by type of claim
Labor relations and Legal counsel notified as appropriate	Community reports issued every term

Questions

