

6005 B - COMPLIANCE INVESTIGATION

EFFECTIVE DATE: July 1, 2020

REFERENCES: Corporate Compliance: Guide to Conducting Workplace Investigation

The purpose of this policy is to ensure prompt and appropriate investigation of compliance concerns and allegations.

Definition

Internal Investigation – An investigation of any concerns or allegations within an organization. The concerns or allegations for the Compliance Officer or designee to investigate may include but are not limited to, any allegations or complaints regarding non-Medicaid related fraud, waste, and abuse of the program and misconduct.

Investigation Requirements

- A. All investigations begin with a review of submitted concerns or allegations.
- B. There should be a thorough review of any documentation and information that is involved in the investigation. It may include an audit of billing practices and corrective actions, if necessary. The Division should cease all of the contributing factors that may be the cause of the non-compliance, as appropriate.
- C. Interviews with a participating individual(s) are as follows:
 1. The interview includes the “Who, What, When, Where, and Why” of the circumstances.
 2. All interview notes and document notes reviewed shall be kept as part of the investigation file.
- D. The Division initiates Corporate Compliance in-services and training if necessary, to the appropriate departments or individuals involved.
- E. The results of the investigation are the last components in the file. As a result of the investigation, the Compliance Officer or Designee may include a corrective measure with the referral to bring the issue into compliance. The referral is sent to the DDD Employee Relations and DES Internal Affairs. However, based on findings from the investigation, the Corporate Compliance Team may review the circumstances that formed the basis for the investigation to determine whether similar problems have been uncovered. When the investigation is completed, the results will be filed in its designated file.
 1. The Compliance Officer or designee summarizes the investigation, corrective actions, if applicable, and procedures that are put in place to prevent the non-compliance circumstances from recurring.
 2. If the Compliance Officer or designee investigates an alleged violation and believes the integrity of the investigation may be at stake because of the presence of employee(s) under investigation, Division shall remove the

individual(s) involved from current responsibilities until the investigation is completed.