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| **CONFIDENTIAL INVESTIGATION PLAN**Investigation No.   |

**IMPORTANT:** To the extent possible, all investigations must be completed within x # of days of receiving notification or otherwise becoming aware of an incident. Additionally, recommendations and actions plans resulting from the investigation should be communicated as soon as possible, but no later than x # of business days upon completion of the investigation.

**Section I: Initial Information**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Date: |       |  | Lead Investigator: |       |
| Facility: |       |  | Lead Department:  |       |
| Date of Incident: |       |  | Incident Level: | [ ] High [ ] Medium [ ] Low |

|  |  |
| --- | --- |
| Attorney-Client Confidentiality or Attorney Work-Product Privilege\*: | [ ] Yes [ ] No  |

**Section II: Investigation Team**

|  |  |
| --- | --- |
| **Name** | **Task** |
| Type name here | Lead Investigator |
|       |       |
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**Section III: Brief Description of Allegation**

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**Section IV: Risk Factors**

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|  |  |  |  |  |  |
| Alleged violations of state and federal law or the code of ethics & conduct that would result in serious harm to individuals or the company or significant civil or criminal penalties? |  | Y | [ ]  | N | [ ]  |
|  |  |  |  |  |  |
| Allegation against executive leadership? |  | Y | [ ]  | N | [ ]  |
|  |  |  |  |  |  |
| Allegation involving more than a single team or multiple reports from various teams directed toward a single leader? |  | Y | [ ]  | N | [ ]  |
|  |  |  |  |  |  |
| Allegation involving multiple sites, a region or the organization? |  | Y | [ ]  | N | [ ]  |
|  |  |  |  |  |  |
| Allegation that could undermine the effectiveness of the compliance program? |  | Y | [ ]  | N | [ ]  |
|  |  |  |  |  |  |
| Allegation could result in media attention, damage (monetary or reputation)? |  | Y | [ ]  | N | [ ]  |
|  |  |  |  |  |  |
| Allegation could result in government actions against company? |  | Y | [ ]  | N | [ ]  |
|  |  |  |  |  |  |
| Allegation of claims that could result in the need to make a regulatory report? |  | Y | [ ]  | N | [ ]  |
|  |  |  |  |  |  |
| Are there secondary investigations to be completed (i.e. retaliation, privacy, etc.) |  | Y | [ ]  | N | [ ]  |

**\* If the answer is YES to any of the questions above, consult with the Legal Department before proceeding.**

**Section V: Stakeholders**

|  |  |
| --- | --- |
| **Name** | **Reason/Purpose** |
| e.g., Sally Smith, Clinical Director | e.g., Clinical policy subject matter expert / consultant |
|       |       |
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**Section VI: Evidence Gathering**

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| --- | --- | --- |
| **Type of Evidence** | **Source of Evidence** | **Investigation Team Member Responsible for Reviewing** |
| e.g., Medical Record | e.g., Health record/Health Information Dept | e.g., Melissa E., Compliance |
|       |       |       |
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**Section VII: Witness Interviews**

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| **Interview Order** | **Name of Interviewee** | **Date of Interview** | **Exempt (Y/N)** | **Shift** | **Interviewer (witness)** |
| 5 | e.g., Bob Smith | 4/18/2018 | Y/N | e.g., 9-5:30pm | Melissa E. (Jackie S.) |
|       |       |       |       |       |       |
|       |       |       |       |       |       |
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**Section VIII: Work Plan**

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| **Task** | **Responsible Party** | **Due Date** |
| Document / develop Investigation Plan | Lead investigator (e.g., Melissa E..) |       |
| Document case notes and interviews | Investigation team member (e.g., Jackie S.) |       |
| Develop recommendations based on findings | Lead investigator (e.g., Melissa E.) |       |
| Assemble and send out Final Report | Lead investigator (e.g., Melissa E.) |       |
| Execute action plans / disciplinary action | Employee's manager (e.g., Bill S.) |       |
| Secure storage of final case file / Final Report | Lead investigator (e.g., Melissa E.) |       |
|       |       |       |
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**Section VIIII: Timeline of Events**

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