Internal Investigations: Process and 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 & 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
## Communication, Reports, Actions

<table>
<thead>
<tr>
<th>Communication</th>
<th>Reports-Actions</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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<tr>
<td>Complainant notified of result, in brief</td>
<td>Discipline-referred to Labor Relations</td>
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<tr>
<td>Supervisor(s) advised/notified as necessary</td>
<td>Legal Enforcement for Substantiated Criminal Behavior</td>
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<tr>
<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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PARTICIPATION

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

RU = Zero Tolerance (means we take complaints seriously and will look into them)