

Eli's Hospice Insider

COMPLIANCE: Take 5 Tips for Top-Notch Internal Compliance Investigations

Don't undermine your compliance efforts by failing to document findings.

Without a strong process for addressing internal fraud allegations, your agency could make the mistake of focusing only on external inquiries. This lost opportunity can result in costly whistleblower lawsuits. Having a strong plan in place to address employee complaints can head off bigger problems down the road.

Tip #1: Establish a Process for Internal Investigations

Coordinate your internal inquiry process with your other departments and organizational policies and procedures, said attorney **Mary Michal** with Reinhart Boerner VanDeuren of Madison, Wis. During the recent Eli-sponsored audioconference, "Staying Ahead of Compliance Problems: Ten Mistakes and How to Avoid Them."

The policy should make include the step of considering whether to involve legal counsel or outside consultants, Michal said. Skipping this step can result in problems such as lack of attorney client privilege of your findings.

Tip #2: Train Employees On Your Investigation Process

Inform employees up front about the steps involved in your agency's proactive investigation process. "Stressful conditions do not promote good decision making," Michal said. Instead, train employees thoroughly so they are "hard wired" with the compliance procedures that will protect your organization, she said.