

ST. LAWRENCE NYSARC  
**Corporate Compliance Program**

Section 11



**INTERNAL INVESTIGATION**

**I. POLICY** - St. Lawrence NYSARC will respond to reports or reasonable indications of suspected noncompliance by commencing a prompt investigation of the allegations to determine whether a violation has, in fact, occurred.

**II. SCOPE** - This policy applies to all investigations conducted to evaluate possible violations of laws or regulations or of the Corporate Compliance Plan. It is not intended to interfere with St. Lawrence NYSARC's Policy and Procedures to address incident reporting and allegations of abuse.

**III. PROCEDURE**

**A) The Investigation**

- The Corporate Compliance Officer works collaboratively with the Executive Director and other key administrators to oversee the conduct of internal investigations of compliance issues. Depending upon the type of infraction, a team of investigators will be assigned as needed. The Corporate Compliance Officer in coordination with the Executive Director will consider whether the investigation should be conducted under privilege.
- Depending upon the violation, the Corporate Compliance Officer will work with the investigation team to develop a strategy for reviewing and examining the facts surrounding the possible violation, which may include, but not be limited to an audit of billing practices and interviews. Interviews should include the "Who, What, When, Where, and Why" of the circumstances. All interview notes and notes from the documents reviewed shall be kept as part of the investigation file.

**B) Post-Investigation**

- Upon receipt of the results from the investigation, depending on the scope and severity of any identified violations, the Corporate Compliance Officer may consult with the Executive Director and the Corporate Compliance Committee to determine:
- The results of the investigation and the adequacy of recommendations for corrective actions;
- The completeness, objectivity and adequacy of the results and findings; and/or
- Further actions to be taken as necessary and appropriate.

**C) Documentation**

- At the conclusion of the investigation, the Corporate Compliance Officer will organize the information in a manner that enables St. Lawrence NYSARC to determine whether an infraction did, in fact, occur. The Corporate Compliance Officer will track the investigation, including responsible parties and due dates in the central log book. The log book will include a notation of "closed" (or other similar notation) when the matter has been investigated and/or fully resolved.

**D) Reporting**

- The Corporate Compliance Officer will be responsible for reporting all investigations to the Executive Director, Corporate Compliance Committee and Board.

Board of Directors Approval Date: December 12, 2006

Effective Date: January 1, 2007

Revision Date