INVESTIGATION POLICY

PURPOSE
To establish a policy through which complaints are investigated in a fair and consistent manner in support of the Complaint Reporting Policy.

SCOPE
This applies to all employees of LADD.

POLICY
It is the policy of LADD to complete thorough, timely and unbiased investigations of all complaints and suspected wrongdoing.

STANDARDS AND DEFINITIONS:

1. Investigating what appears to be an action or a situation requiring remedial actions may involve the CCO and Department Directors clarifying policies, reviewing, recommending revision and if necessary development of new policy, procedure, forms in order to prevent future occurrences.
2. Behaviors that could require remedial actions might include the following:
   - Failure of an individual to understand and carry out required procedures and policies;
   - Inappropriate or improper implementation of the LADD Compliance and Ethics Program;
   - Not reporting when aware of issues;
   - Negligent or malicious behavior.
3. If remedial action is necessary, the affected individual(s) will be notified of the concerns regarding their performance, and if applicable remedial actions may include:
   - The individual(s) will be required to take part in an educational/training program focused on the problem area and/or
   - The individual(s) may be reassigned, suspended with or without pay, demoted, transferred or subject to other disciplinary action up to and including separation from employment.
   - An employee will be subject to disciplinary action if LADD concludes that the employee knowingly fabricated, exaggerated, or minimized a report of wrongdoing either to injure someone else or to protect him/herself or others.
   - An employee whose report contains admissions of personal wrongdoing will not and cannot be guaranteed protection from discipline. LADD generally will give positive weight to self-confession in determining disciplinary action but the extent depends on factors such as whether the employee's conduct was previously known to LADD, whether discovery of the conduct was imminent, and whether the confession was complete and truthful and whether the conduct violated people’s rights or agency contracts or other regulations.

PROCEDURE

1. Upon receiving a report of suspected wrongdoing, improper behavior or violation of company policy and procedure the CCO will immediately begin the investigation process by documenting the details of the report and organizing the investigation.
2. The CCO will begin the investigation by documenting an investigative action plan that may include the following:
   a. Date
   b. Person reporting
   c. Description of the incident
   d. Develop list of questions to help determine the validity of the report

    e. Develop a list of individuals to be interviewed
    f. Identify gaps, additional risks
    g. Identify additional, supporting pieces of information
    h. Develop recommendations and contingencies
3. Upon completion of the investigative action plan the CCO will coordinate with other Directors to formulate the next steps of the investigation which may include delegating portions of the investigation to others to complete interviews and research of applicable laws, regulations, contract standards or policies and procedures.
4. The CCO will document and/or collect documentation to support the investigation.
5. The CCO will report findings to the Executive Director or their designee and/or Compliance Committee/Steering Committee who may seek legal counsel for guidance and corrective action steps.
6. The CCO will be responsible for making sure follow up has taken place and may consist of discipline, additional training and reporting to authorities.
7. The CCO, when possible will report to the original complainant regarding findings.
8. The CCO will insure immediate action is taken to implement corrective action and coordinate with the Services and QA teams to implement system changes to reduce/eliminate the possibility of future reports.
9. When applicable full disclosure will be made to the correct governmental or legal authority. A Notice of Findings of the investigation, findings and corrective action will be included as required.
10. The CCO will maintain investigation documentation, track data for trend analysis and report annually as part of the Strategic Planning process.
11. The Executive Director or their designee may require additional investigation from a third party under certain circumstances, if warranted to insure objectivity.