

Administrative Investigations

ADMINISTRATIVE INVESTIGATIONS

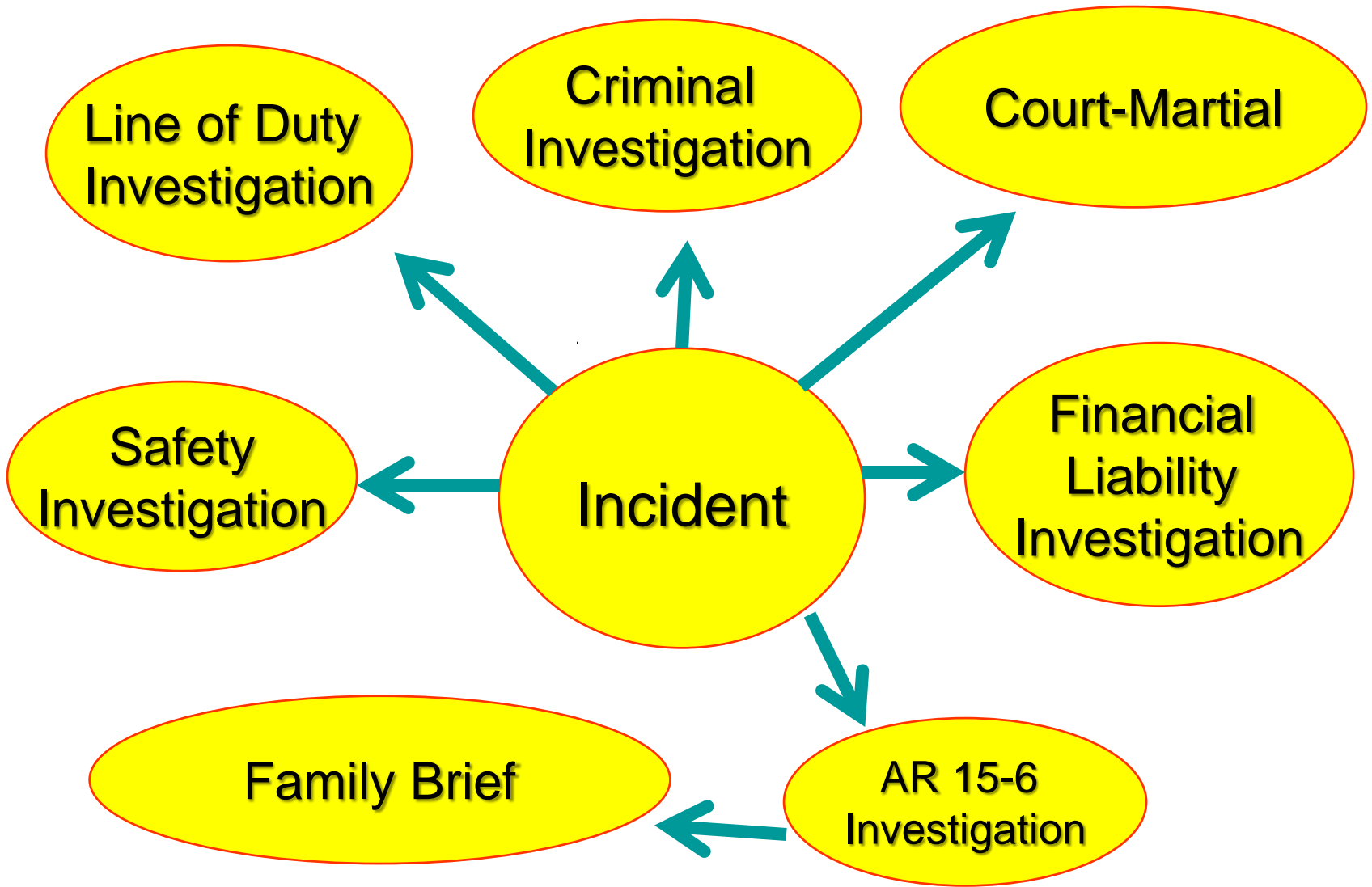
Administrative Investigations

Commanders have the
inherent authority to investigate
any matter under their responsibility, unless
otherwise prohibited or limited, if undertaken for
the purpose of furthering the good order and
discipline of their command

**Key to
Success**

Do them
Do them right
Do them right away

ADMINISTRATIVE INVESTIGATIONS



ADMINISTRATIVE INVESTIGATIONS

Agenda/References

- AR 15-6, *Procedure for Administrative Investigations and Boards of Officers*, 1 April 2016
- AR 385-10, *The Army Safety Program*, 24 February 2017
- AR 600-8-4, *Line of Duty Policy, Procedures, and Investigations*, 4 September 2008
- AR 638-34, *Army Fatal Incident Family Brief Program*, 19 February 2015
- AR 600-20, *Army Command Policy*, 6 November 2014

ADMINISTRATIVE INVESTIGATIONS

Army Regulation 15-6

- Provides guidance on the conduct of investigations
- General and specific application to various investigations
- Use AR 15-6 when:
 - Whenever an appointing authority needs a complete investigative report containing facts and recommendations
 - When regulations require it

Army Regulation 15-6

Boards, Commissions, and Committees

**Procedures for
Administrative
Investigations
and Boards of
Officers**

Headquarters
Department of the Army
Washington, DC
1 April 2016

UNCLASSIFIED

ADMINISTRATIVE INVESTIGATIONS

“When Regulations Require It”

13–25. Use of an AR 15–6 investigation

a. There are five situations warranting an investigation performed per AR 15–6 in lieu of a financial liability investigation conducted under this regulation. These situations occur when directed by—

- (1) Other regulatory guidance.
- (2) A commander.
- (3) A financial liability investigation approving or appointing authority per AR 15–6.
- (4) The loss or destruction involves a controlled item with a CIIC of 1-6, 8, 9, N, P, Q, R, night vision devices, and navigation systems (for example, Global Positioning System).
- (5) Serial number changes for sensitive items will require the processing of a DD Form 200 and an AR 15–6 investigation if changes involve more than two characters.

- AR 735-5, Property Accountability Policies
- AR 638-8, Army Casualty Program

(1) The CDR having general courts-martial jurisdiction over the unit to which the casualty was assigned (or a higher authority designated by the combatant CDR or intermediate CDR authorized to make such designation) will initiate investigations (formal or informal) in accordance with AR 15–6 for all hostile deaths, deaths resulting from military-related accidents, deaths and injuries resulting from suspected friendly fire, and deaths resulting from suspected suicide.

ADMINISTRATIVE INVESTIGATIONS

AR 15-6 Investigation

- A Commander's information tool to collect facts, make findings, and obtain recommendations
- Three procedures
 - Preliminary Inquiry
 - Assess the nature and size of a problem, identify witnesses, summarize initial statements and determine the necessity and scope of follow-up investigations.
 - Administrative Investigations
 - Flexible, less time and resource intensive investigation than a Board of Officers.
 - Board of Officers
 - More time intensive. Respondent designated and provided substantial due process rights.

ADMINISTRATIVE INVESTIGATIONS

Who May Convene: The Appointing Authority

- Board of Officers
 - GCMCA/SPCMCA
 - Any general/flag officer
 - Any commander, deputy commander, or special, personal, or principal staff officer in the rank of colonel (lieutenant colonel if assigned to a slot authorized a colonel)
 - GS-14 (or above) agency head or division chief
 - Principal Deputies, Assistant Deputy Chiefs of Staff, and Assistant Secretaries of the Army at HQDA

ADMINISTRATIVE INVESTIGATIONS

Who May Convene: The Appointing Authority

- Administrative Investigation and Preliminary Inquiry
 - Anyone who can appoint a board of officers
 - Any commander
 - Special, personal, or principal staff officer or supervisor in the grade of major or above

Special Situations:

AR 15-6 Limitations

- Only a GCMCA or GO/FO in a command billet may appoint an AR 15-6 if:
 - Property damage of \$2M or more;
 - Loss or destruction of Army aircraft or missile;
 - Unmanned aircraft system with a repair or replacement cost of \$2M or more;
 - Injury or illness likely to result in death or permanent total disability;
 - Death of one or more persons.
- Combatant Commander or delegee for Friendly Fire incident investigations
- The next superior authority to the GCMCA is the appointing authority if:
 - Class A training accidents resulting in or likely to result in death, permanent total disability
 - Combat related deaths involving non- DOD personnel
 - Insider attack (green on blue)

ADMINISTRATIVE INVESTIGATIONS

Special Situations: Hostile Death

- All hostile deaths must be investigated (AR 638-8)
 - Appointed by GCMCA but authority can be delegated to SPCMCA in writing (AR 15-6) but see DODI 6055.07.
 - CDRs must notify CMAOC of any/all investigations into deaths and any new information on circumstances of death (AR 638-8)
 - Investigation must be forwarded to Casualty and Mortuary Affairs Operation Center (CMAOC) upon completion
- Field grade officer must review all initial casualty reports (AR 638-8)

ADMINISTRATIVE INVESTIGATIONS

Special Situations: Suicide

- All suicides and suspected suicides must be investigated (AR 600-63 and AR 638-8)
- Appointed by GCMCA (AR 15-6)
- Investigation must
 - Coordinate with CID, medical examiner, mental health provider, Line of Duty officer
 - Use “Lines of inquiry” suggested questions as starting point
 - Provide recommendations to prevent future suicides

ADMINISTRATIVE INVESTIGATIONS

Friendly Fire

DODI 6055.07: A circumstance in which members of a U.S. or friendly military force are mistakenly or accidentally **killed or injured** in action by U.S. or friendly forces actively engaged with an enemy or who are directing fire at a hostile force or what is thought to be a hostile force

Units must report and investigate all suspected friendly fire incidents as soon as evidence leads personnel on the ground to believe that friendly fire may be involved

ADMINISTRATIVE INVESTIGATIONS

Friendly Fire Procedures

- **Provide immediate telephonic notice** through the Casualty Assistance Center to the Army Casualty and Mortuary Affairs Operation Center (CMAOC)
- **Generate an initial (INIT) casualty report** through command channels to combatant commander
- **Initiate AR 15-6 investigation**
 - Appointed by Combatant Commander or his/her designee
 - Normally delegated to the GCMCA (CENTCOM)
 - Must be approved by Combatant Commander

ADMINISTRATIVE INVESTIGATIONS

Friendly Fire Procedures

(continued)

- **Contact the Combat Readiness/Safety Center** and initiate safety investigation - *subject to Combatant Commander discretion*
- **Contact the local CID Detachment**
- **Submit supplemental (SUPP) casualty report** when there is a substantial change to the initial report
- **Email monthly updates to CMAOC**
- Once approved by the Combatant Commander, **submit AR 15-6 proceedings to CMAOC**
- **Coordinate with CMAOC** to provide a presentation to the family for fatality cases

ADMINISTRATIVE INVESTIGATIONS

How to Appoint: The Appointment Memorandum

- Written appointment for administrative investigations and boards of officers
- Describe the facts as they are known at the time
- Be specific in what the investigating officer is to accomplish – scope!
- Give adequate guidance and special instructions

ADMINISTRATIVE INVESTIGATIONS

Whom to Appoint:

The AR 15-6 Investigating Officer

- Grade
 - Commissioned/warrant officer
 - GS-11 and above
- Senior to person under investigation
- Impartial
- **Best qualified** by reason of education, training, experience, length of service, demonstrated sound judgment and temperament
- E-7 if military exigencies exist
- Assistant Investigating Officers are allowed

ADMINISTRATIVE INVESTIGATIONS

Conducting the Investigation

- Mandatory legal brief
- Must be thorough and impartial
- Using an investigative plan is a must
 - Who, what, where, when, why, and how
- Rules of evidence generally do not apply – **but evidence must be relevant and material**
 - Limits: Privileged communications, evidence of polygraph only with consent of subject, no involuntary admissions, no bad faith searches, MRE 412

ADMINISTRATIVE INVESTIGATIONS

Concluding the Investigation

- Facts
 - Clear, concise, and readily deduced from the evidence in the record – should refer to a piece of evidence
- Findings
 - **Preponderance of the evidence** (more likely than not)
 - Findings must make common sense
- Recommendations
 - Consistent with the findings

Legal Review

- Required for
 - All investigations
- Determine
 - Whether the proceedings comply with legal requirements and the appointment memo
 - What effects any errors have
 - Whether sufficient evidence supports the findings
 - Whether the recommendations are consistent with the findings



ADMINISTRATIVE INVESTIGATIONS

Appointing/Approving Authority Action

- Appointing/approving authority may
 - Approve as is
 - Disapprove
 - Return for additional investigation
 - Make exceptions and substitutions
- Recommendations
 - Treat just as findings, approving/disapproving them accordingly
 - Become final agency decision once approved and thus may be released under the Freedom of Information Act
- Corrective action

ADMINISTRATIVE INVESTIGATIONS

Flags

- **Mandatory for commander's investigations**
 - Subjects of AR 15-6 preliminary inquiry, administrative investigation, CDR's Inquiry
- **Failure to flag is a regulatory violation**
- **An administrative action, not punishment**
- **Impose within 3 working days of:**
 - Suspect/Subject of investigation; or
 - IO later suspects witness of misconduct
- **Remove within 3 working days of:**
 - No adverse findings against Soldier;
 - CDR decides to take no action against Soldier; or
 - Different flag imposed

ADMINISTRATIVE INVESTIGATIONS

Follow-on Actions

- Before adverse admin action based on 15-6:*

 - Subject is given notice and a copy of the report of investigation;
 - Subject has reasonable opportunity, no less than 10 days, to respond; and
 - Commander must consider response, if submitted in a timely manner, before taking adverse action

- Implement approved recommendations
 - Organizational corrections for the staff process

***Only when adverse action does not provide its own procedural safeguards**

Referral of Adverse Information

Investigations containing adverse information regarding a FG officer must be referred to that officer advising the officer of

- Their ability to have a redacted copy and relevant portions
- Right to remain silent
- The adverse information may be provided to a promotion board
- The approving authority will consider their response
- At least **10 business days** to respond

AR 600-20, para. 4-19, Treatment of Persons

Command Responsibilities

- Commanders will immediately report allegations of criminal behavior in violation of this paragraph to law enforcement.
- All other allegations reported to a commander will be investigated in accordance with the informal procedures set forth in AR 15–6 or as a commander's inquiry.

ADMINISTRATIVE INVESTIGATIONS

AR 385-10 Safety Accident Investigations

- Function of safety accident investigation is to **prevent future accidents**, it cannot be used to take adverse action
- Anticipate multiple investigations into same incident, each serving specific purpose
 - Safety, AR 15-6, criminal, line of duty



ADMINISTRATIVE INVESTIGATIONS

Classes of Accidents

- **Class A:** Damage totaling \$2M or more; accidents involving aircraft*; injury/occupational illness resulting in fatality or permanent total disability (includes friendly fire incidents)
- **Class B:** Damage between \$500k - \$2M; injury/occupational illness resulting in permanent, partial disability; 3 or more personnel hospitalized in a single occurrence
- **Class C:** Damage between \$50k - \$500k; injury/occupational illness resulting in loss of one or more days of work beyond the day of injury/illness
- **Class D:** Damage between \$20k - \$50k; injury/occupational illness resulting in restricted work, transfer, medical treatment greater than first aid
- **Class E Ground Accident:** An accident in which the resulting total cost of property damage is \$5k-\$20k
- **Class E Aviation Accident:** An accident in which the resulting total cost of property damage is \$5k-\$20k
- **Class F Aviation Incident:** Aircraft turbine engine damage because of unavoidable internal or external foreign object damage, where that is the only damage

ADMINISTRATIVE INVESTIGATIONS

Accident Investigations

- Two Types
 - **Safety Accident Investigation**
 - IAW AR 385-10
 - Boards convened by GCMCA; Cdr, USARC (USAR); State Adjutant General (ARNG) for serious incidents
 - **Legal Accident Investigation**
 - IAW AR 385-10 and other regulations (AR 15-6)
 - Serious incident investigations convened by GCMCA due to the nature of the event

ADMINISTRATIVE INVESTIGATIONS

Legal Accident Investigations

- AR 15-6, AR 385-10, AR 385-40, and AR 638-34
- Required for
 - All Class A accidents, to include cases of friendly fire
 - As directed by the SJA IAW the claims regulation
 - On accidents where there is a potential claim or litigation for or against the government or government contractor
 - On accidents with a high degree of public interest or anticipated disciplinary or adverse administrative action
- **Used to obtain and preserve all available evidence for use in litigation, claims, disciplinary action, or adverse administrative action**

ADMINISTRATIVE INVESTIGATIONS

Priority and Sharing

- Priority: Criminal (CID), safety, legal (AR 15-6)
- Safety can access the criminal and legal
- Privileged safety information*
- Safety investigations will not be enclosed in any other report (not shared)
- But, can share common-source documents, photographs, and those documents (other than witness statements) containing purely factual information (but not assessments/conclusions)

ADMINISTRATIVE INVESTIGATIONS

Army Regulation 638-34

Family Brief

- Purpose of the brief is to provide results of fatal accident investigations and confirmed cases of suicide to the next of kin
- Must be conducted within 30 days after completion of investigation
- Conducted by an O6 in chain of command
 - Chaplain, Casualty Assistance Officer
 - Others as needed (PAO, SJA, Medical, Interpreter)

ADMINISTRATIVE INVESTIGATIONS

AR 600-8-4 Line of Duty Determination/Investigation

- Line of duty determination required when service is interrupted by injury, disease, or death
- Purpose is to protect the interest of the individual and the United States



ADMINISTRATIVE INVESTIGATIONS

Three Possible Outcomes (and consequences)

- In line of duty
 - May receive - Army Disability Retirement, Separation Compensation, DVA Compensation & Hospitalization, Incapacitation Pay (USAR & ARNG)
- Not in line of duty – Not due to own misconduct
 - May lose - disability retirement, separation compensation, DVA disability or hospitalization, civil service preference
- Not in line of duty – Due to own misconduct
 - Must make up lost days, lost days excluded from longevity and retirement pay computations, forfeit pay (for days lost due to disease resulting from intemperate use of drugs/alcohol), loss of disability retirement and severance pay, potential loss of DVA benefits (DVA determination)

ADMINISTRATIVE INVESTIGATIONS

Line of Duty Analysis

**Soldier
Misconduct?**

Yes



**Not in Line of Duty -
Due to Own
Misconduct**

No



(if proximate cause)

Authorized Status?*

Yes



In Line of Duty

No



**Not in Line of Duty –
Not Due to Own
Misconduct**

*Authorized status = present for duty, leave, pass, etc., versus AWOL or deserter. It does not necessarily mean “performing military duties” or “in scope of employment”

ADMINISTRATIVE INVESTIGATIONS

Presumptions

- Presume ILD without investigation:
 - Disease (exceptions)
 - Enemy action or terrorist attack
 - Death from natural causes
 - Death as passenger on common commercial carrier or military aircraft
 - Superficial injuries with no lasting significance

Informal Investigation

- **Informal**: Company commander performs and signs **DA Form 2173** and provides to appointing/approving authority
 - No misconduct or negligence suspected
 - Medical Treatment Facility (MTF) rep and commander sign a DA Form 2173
 - Appointing/Approving authority: Special Court-Martial Convening Authority
 - Can only result in a finding of ILD (except when medical doctor finds condition existed prior to service –EPTS)

ADMINISTRATIVE INVESTIGATIONS

Formal Investigation

- **Formal**: IO appointed, findings and recommendations on **DD Form 261**
 - Strange or doubtful circumstances
 - Injury or death involving drugs or alcohol abuse
 - Self-inflicted injuries/suicide
 - Injury/death while AWOL
 - Appointing authority: Special Court-Martial Convening Authority
 - Approving authority: General Court-Martial Convening Authority

ADMINISTRATIVE INVESTIGATIONS

Formal Investigation (cont.)

- Soldier presumed in line of duty
- Contrary finding must be rebutted by substantial evidence, under a preponderance standard
- Soldier not required to make a statement against interest
- Soldier afforded notice and opportunity to rebut adverse findings
- Legal review for all formal investigations

Questions?

ADMINISTRATIVE INVESTIGATIONS

Financial Liability Investigations of Property Loss (FLIPL)



ADMINISTRATIVE INVESTIGATIONS

References

- AR 735-5, *Property Accountability Policies*, 9 November 2016
- AR 600-4, *Remission or Cancellation of Indebtedness*, 14 July 2016
- AR 15-6, *Procedure for Administrative Investigations and Boards of Officers*, 1 April 2016
- DA Pam 735-5, *Property accountability Procedures and Financial Liability Officer's Guide*, 23 March 2016

Purpose

- Document the circumstances surrounding the loss, damage or destruction of Government property
- Serve as voucher (documentation) allowing for the adjustment of property books
- Document charges of or relief from financial liability

Processing Timelines

1. Initiation (upon discovery of LDDT)

- Active Army: 15 calendar days
- USAR: 75 calendar days
- ARNG: 75 calendar days

2. Investigation and Recommendation

- Active Army: 30 calendar days
- USAR: 85 calendar days
- ARNG: 85 calendar days

3. Adjudication

- Active Army: 10 calendar days
- USAR: 80 calendar days
- ARNG: 80 calendar days

Total Cumulative Time

- Active Army: 75 calendar days
- USAR: 240 calendar days
- ARNG: 240 calendar days

ADMINISTRATIVE INVESTIGATIONS

Initiating an Investigation

WHO:

- Hand receipt holder
- Accountable officer
- Person with the most knowledge of the loss



WHEN:

- Loss, Damage, Destruction or Theft of property is Discovered

MUST (not exhaustive list):

- Negligence/willful misconduct suspected (No admission)
- Controlled inventory item (NVGs)(AR 15-6 investigation required)
- Loss exceeds respondent's monthly basic pay

ADMINISTRATIVE INVESTIGATIONS

Financial Liability Officer

Appointed by the Appointing Authority



- Senior to the person subject to possible liability
- E7 or higher
- GS-07 or higher

ADMINISTRATIVE INVESTIGATIONS

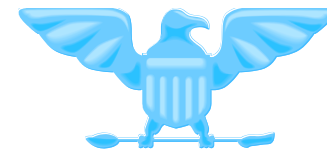
Approving/Appointing Authority

- Approving authority
 - \$100,000 or more or a controlled item – First GO or SES in rating chain
 - More than \$5,000 and less than \$100,000 – COL or GS-15 in a supervisory position
 - \$5,000 or less (not SI, COMSEC, or PII) – LTC if delegated in writing
- Appointing authority
 - Must be LTC (or MAJ in LTC billet) or DOD civilian GS-13 (GS-12 in GS-13 billet)
 - First COL in CoC when approving authority is GO or SES

ADMINISTRATIVE INVESTIGATIONS

Appeal Authority

- Respondent must request reconsideration first
- Denied request for reconsideration becomes appeal
- A request for reconsideration stops all collection action pending a decision by the approving authority and/or the appeal authority
- Appeal authority must be senior to the Approval authority



The Investigation

- See your Judge Advocate before you start
 - Understand Culpability, Liability, Proximate Cause, and Loss
- Investigation is the FLO's **PRIMARY RESPONSIBILITY** until completion
- Collect and document the evidence
- Make recommendations



ADMINISTRATIVE INVESTIGATIONS

The Investigation



The FLO must address:

- **Responsibility** (Who had an obligation to safeguard property)
- **Culpability** (Was there negligence or wrongdoing)
- **Proximate Cause** (Did the negligence actually lead to the loss)
- **Loss** (Value of the loss)

ADMINISTRATIVE INVESTIGATIONS

The Investigation

Know the Types of Responsibility

- Command
- Supervisory
- Direct
- Custodial
- Personal



ADMINISTRATIVE INVESTIGATIONS

COMMAND
RESPONSIBILITY

Commanders at all levels.
Responsibility for
all property within their
command

CUSTODIAL
RESPONSIBILITY

Supply SGT, supply custodian,
supply clerk, or warehouse person.
Responsibility for property in storage
awaiting issue or turn-in

SUPERVISORY
RESPONSIBILITY

All supervisors.
Responsibility for all
property in the
possession of
personnel under
their supervision

DIRECT RESPONSIBILITY

Anyone who has signed for property.
Accountable officers,
primary/sub-hand receipt holders.
Responsibility for all
property for which they
have signed a hand receipt.

PERSONAL RESPONSIBILITY

Anyone who has physical possession of property.
Responsibility for property
in his or her possession

STIGATIONS

The Investigation

Culpability

Breach in standard of care

- Negligence
- Gross Negligence or Willful Misconduct

Factors that must be considered:

- Age & experience
- Ongoing activities (e.g., combat operations)
- Supervision
- Complexity of the organization or activity
- Type of responsibility individual had toward the property

ADMINISTRATIVE INVESTIGATIONS

The Investigation

Proximate Cause

“[T]he person’s acts or omissions were the cause that, in a natural and continuous sequence, unbroken by a new cause, produced the loss, damage, or destruction, and without which the loss, damage, destruction, or theft would not have occurred.”



The Investigation

Loss

Types of Loss

- Actual Loss (actual, known physical disappearance, damage or destruction)
- Loss of Accountability (“when it cannot be accounted for by the last responsible person in the audit trail”)

Value of the Loss

- Fair Market Value at time of the loss (Preferred)
- Depreciated

The Investigation

Loss

Liability Limitations:

- One month's base pay at the time of the loss
 - ARNG & USAR (One Month AD pay, Not Drill Weekend)

Exceptions (Liable for Full Amount of Loss)

- Personal Arms and Equipment
- Government Quarters
 - Involving Gross Negligence/Willful Misconduct
- Loss of Public Funds
- Loss Attributable to an Accountable Officer
- Loss Attributable to Contractors

ADMINISTRATIVE INVESTIGATIONS

The Investigation Loss

Collective Liability: Make more, pay more

Actual Loss = \$2,600

People liable = 3

Person 1 base pay =	\$1,200.00
Person 2 base pay =	\$1,600.00
Person 3 base pay =	\$2,000.00
<hr/>	
Total base pay of all 3 =	\$4,800.00

$$\frac{\$1,200.00 \text{ (base pay person 1)}}{\$4,800.00 \text{ (total of all base pay)}} = 25\% \times \$2,600.00 \text{ (loss)} = \$650.00 \text{ (person 1 liability)}$$

$$\frac{\$1,600.00 \text{ (base pay person 2)}}{\$4,800.00 \text{ (total of all base pay)}} = 33\% \times \$2,600.00 = \$585.00 \text{ (person 2 liability)}$$

$$\frac{\$1,200.00 \text{ (base pay person 3)}}{\$2,000.00 \text{ (total of all base pay)}} = 42\% \times \$2,600.00 = \$1092.00 \text{ (person 3 liability)}$$

ADMINISTRATIVE INVESTIGATIONS

Respondent's Rights

During the investigation

- Notice
- Right to respond (Rebuttal)
- Article 31 rights – May be triggered



If found liable

- Written notice containing:
 - Explanation of consequences
 - Notification of right to respond
 - Notification of Right to consult Legal Assistance Attorney

Rebuttal Time constraints

- 7, 15, or 30 days

Appeal

Respondent has 30 days to request reconsideration

2 Steps:

- Request for reconsideration: Sent to the Approval Authority
 - Can consider new evidence
 - Reviews for legal error
 - Denial is automatic appeal to the Appeal Authority
- Appeal: Forwarded to Appeal Authority by the Approval Authority



ADMINISTRATIVE INVESTIGATIONS

Respondent Options

Remission of Indebtedness (AR 600-4)

- Applies to officers and enlisted Soldiers
 - For extreme hardship
 - Applies only to unpaid portions
 - Must request reconsideration first

Extension of collection period

- Forward request through Approval Authority

ABCMR

- DD Form 149
- AR 15-185



ADMINISTRATIVE INVESTIGATIONS

Reopening FLIPL

- After final action is taken
- Authority rests with Approval Authority
- May occur:
 - As part of an appeal
 - Based on new evidence
 - If property is recovered
 - To avoid an injustice
- May result in:
 - Correction
 - Amending
 - Canceling liability

ADMINISTRATIVE INVESTIGATIONS

AR 15-6 Interface

AR 15-6 investigation may result in a FLIPL

- Investigation is used as evidence

Loss of Controlled Inventory Items (with certain CIIC), night vision devices, and navigation systems (example: GPS)

Controlled Item:

- Classified Item
- Sensitive Item
- Pilferable Item



ADMINISTRATIVE INVESTIGATIONS

Alternatives to FLIPL

- Statement of charges/cash collection (DD Form 362)
 - Liability not in dispute
 - Has time limitations
- Abandonment order (colonel or above may authorize)
 - Operational exigencies
 - Memorialize in writing as soon as possible
- Short FLIPL
 - Approval Authority makes decision without investigation
 - Facts on their face support decision

ADMINISTRATIVE INVESTIGATIONS

Conclusions

- Keep in mind when reviewing/conducting:
 - 4 Key elements:
 - Responsibility
 - Culpability
 - Proximate Cause
 - Loss
- Purposes of the FLIPL system
 - Document facts to support adjustment of property book
 - Not punitive or adverse measure

ADMINISTRATIVE INVESTIGATIONS

Questions?

ADMINISTRATIVE INVESTIGATIONS