



# DIVISION OF INVESTIGATION

CALIFORNIA DEPARTMENT OF CONSUMER AFFAIRS

**Stephanie Whitley-Deputy Chief  
Health Quality Investigation Unit**

# Who We Are

## California's Law Enforcement Branch for Consumer Protection



## Mission

To provide law enforcement investigative services, in order to protect California consumers and licensees by effectively and efficiently enforcing laws, regulations, and professional standards.

# Background

- Division of Investigation (DOI) was established by the Legislature in 1961 to provide centralized investigative services for the various regulatory boards, bureaus, programs, committees, and commission within the Department of Consumer Affairs (DCA).
- With the passing of Senate Bill 304 in 2014, the sworn investigative program within the Medical Board of California was transferred to DOI and became the Health Quality Investigation Unit.

# Peace Officer Investigators

- DOI's peace officers are authorized under Penal Code Section 830.3(a) and Business & Professions Code Section 160
- Sworn investigators perform a full range of statewide peace officer investigative duties
- DOI is a POST-participating agency (Commission on Peace Officer Standards and Training)



# Division of Investigation Units

## Investigation & Enforcement Unit (IEU)

### 8 Field Offices

Sacramento 1 & 2  
Concord  
Central Valley  
Chatsworth  
Cerritos  
Rancho Cucamonga  
San Diego

## Health Quality Investigation Unit (HQIU)

### 13 Field Offices

Sacramento 1 & 2  
Concord  
San Jose  
Fresno  
Valencia  
Glendale  
Cerritos  
San Dimas  
Santa Ana  
San Bernardino 1 & 2  
San Diego

Expert Procurement Unit (EPU)

## Special Operations Unit (SOU)

### Sacramento

Internal Affairs  
Background Investigations  
Threat Assessment/Workplace  
Violence Prevention  
Training  
Computer Forensics

# Health Quality Investigation Unit (HQIU)

## Management

- HQIU Deputy Chief reports to DOI's Chief
- Area Commanders oversee multiple field offices
  - Northern Area
  - Los Angeles Metropolitan Area
  - Southern Area

## Field offices

- Supervising investigator
- Five to seven investigators
- Office technician
- Medical consultants



# HQIU Expert Procurement Unit (EPU)

- Established in October 2020 to reduce case investigation time frames by transferring most expert review responsibilities from the field offices.
- Unit of analysts and a supervisor who facilitate the expert review process
- EPU prepares the investigation materials for expert, selects and submits the case to expert, and facilitates receipt of the expert opinion and completion of the case
- Return case to client for review and disposition

# HQIU's Clients



# IEU's Clients



And others



# HQIU Referrals

Board	OMBC	PAB	PMBC	MBC
22/23	52	67	34	1139
23/24	80	64	41	1074
24/25	83	137	12	1091
*25/26	67	60	7	611

\* FYTD through December 2025

# DOI Investigator Training Overview



- Completion of POST regular or specialized investigator basic academy
  - 4 to 6 months
- DOI Field Training Program
  - 15 to 20 weeks led by field office supervisor and a field training officer
- DOI Mini Academy
  - Intensive multi-week training designed to immerse investigators in the specialized knowledge and skills required to conduct complex healthcare investigations
  - Curriculum covers a wide range of topics necessary to conduct DOI investigations such as classes on interviewing, acquisition and review of medical records, subpoenas, medical consultants and expert reviews, CURES and pharmacies, surveillance and undercover operations, search warrants, report writing, and others
- Ongoing in-service training for investigators
  - POST-required trainings for peace officers
  - Continuing specialized trainings and updates

# Types of Investigations

DOI investigations may be administrative, criminal, or both

Quality of Care  
(Negligence &  
incompetence)

Sexual misconduct

Improper  
Prescribing

Unlicensed  
practice of  
medicine

Dishonesty/  
Fraud

Impairment

Conviction of crime

B&P 805 Health  
Facility Reporting

# Trending Investigations

Hydration Clinics

GLP 1 Clinics

Prescribing of Ketamine

Aiding & Abetting  
Unlicensed Practice of  
Medicine

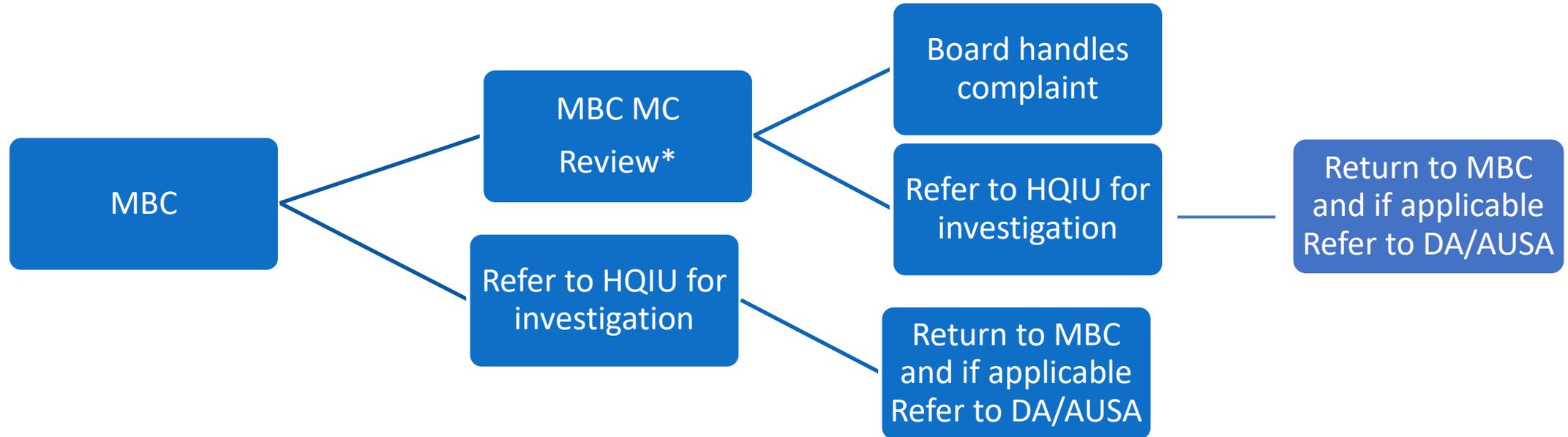
B&P 805  
Mandatory Facility  
Reporting

# Investigation Timelines

- Timely Investigations for MBC (B&P 2319)
  - An average of no more than 180 Days will elapse from receipt of complaint to completion of an investigation
  - Cases that involve complex issues should be no more than one year to investigate
- HQIU's continual goal and trend in reducing case aging
  - Case reviews
    - Every 90 days for cases under a year
    - Every month for cases over a year
    - Every two weeks for cases over two years
  - Scheduled weekly meetings with Board staff
  - Automated monthly reports with case updates to Board



# HQIU – Case Pathway



\*With certain exceptions, MBC complaints determined to involve quality of care shall be reviewed by a consultant (in the same specialty) before referred to HQIU (B&P 2220.08) Exceptions are “urgent” issues involving immediate danger, or a case on the same subject already in the field, or the subject is on probation. These cases are immediately referred to HQIU.

# HQIU – Case Type Priorities

Agenda Item 16

## High Priority Per B&P 2220.05

- Death or serious bodily injury to one or more patients, such that the physician/podiatrist represents a danger to the public
- Drug or alcohol abuse by the physician/podiatrist involving death or serious bodily injury to a patient
- Repeated acts of clearly excessive prescribing of controlled substances
- Repeated acts of clearly excessive recommending of cannabis for medical purposes or repeated acts of recommending cannabis without a good faith prior exam and medical reason
- Sexual misconduct with one or more patients during treatment/exam
- Practicing medicine while under the influence of drugs or alcohol
- Repeated acts of clearly excessive prescribing psychotropic medications to a minor without a good faith prior exam and medical reason

## High Priority Not Listed in Statute

- Statute of limitations expiring within 6 months
- Any case over 2 years old
- Impairment cases not included in B&P 2220.05
- Unlicensed practice of medicine involving serious bodily harm
- Cases involving subjects currently on probation

# General Investigative Steps

- Review complaint and interview complainant and/or patient
- Interview other relevant witnesses
- Obtain all relevant records, documents, and evidence
- Conduct surveillance and/or undercover operations, when needed
- Medical consultant reviews
- Subpoenas and search warrants, when needed
- Subject interview
- Expert review
- Any other relevant case specific investigative steps
- Refer case to prosecutor if criminal and/or return case to client



# What causes case delays?

Uncooperative  
Facilities/Subjects

Multiple patients

Delay or refusal in  
producing records.  
Can't get the  
records certified

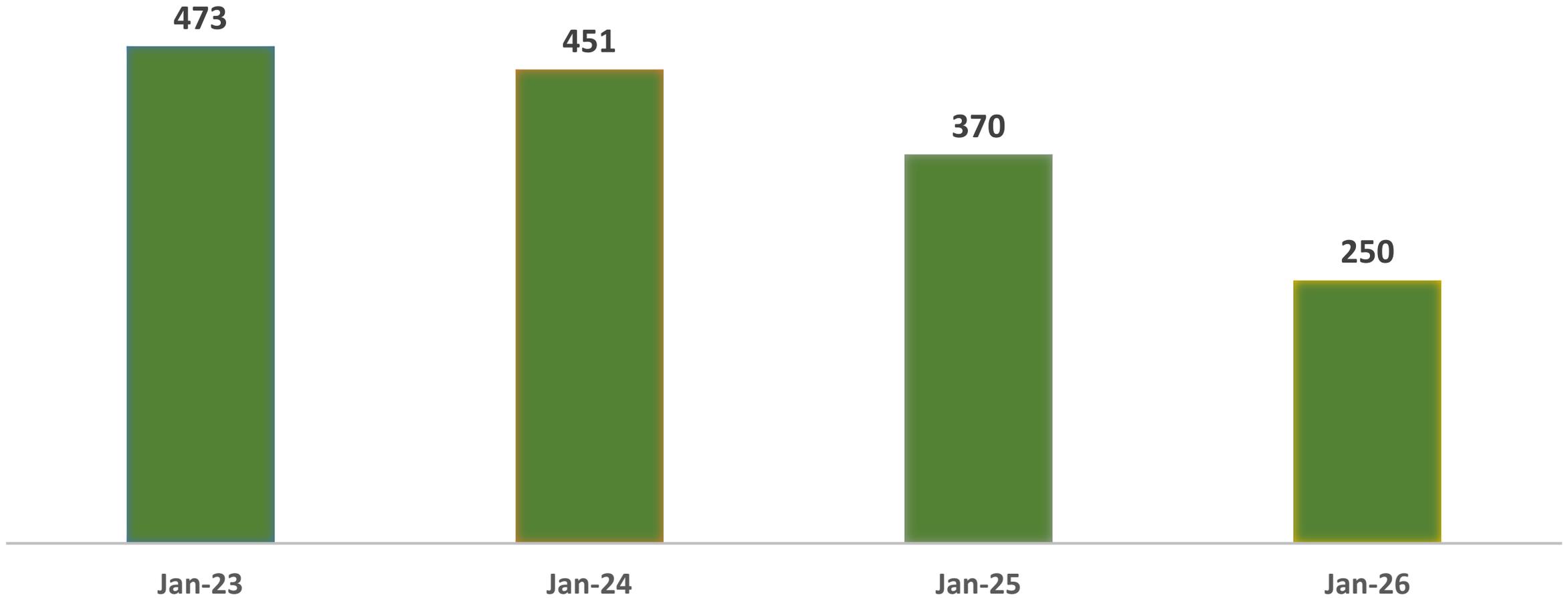
Witnesses  
disappear or don't  
cooperate

Subpoena  
enforcement

Complex Criminal  
Cases

## MBC Investigations Over One Year JAN 2023 - JAN 2026

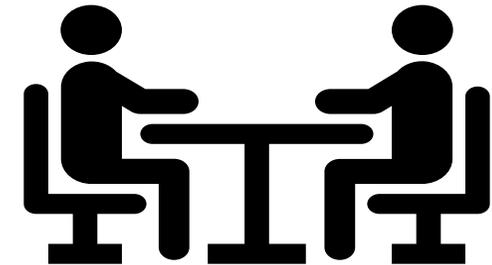
Agenda Item 16



*Note - The counts shown are for MBC cases only.*

# Enforcement Partners

- California Attorney General's Office
  - Health Quality Enforcement Section (HQE)
  - Division of Medi-Cal Fraud & Elder Abuse (DMFEA)
- Local, state and federal allied law enforcement agencies
  - Local District Attorney
  - CA Department of Public Health(CDPH)
  - US Drug Enforcement Administration (FDA)
  - CA Department of Insurance (CDI)
  - Federal Bureau of Investigation (FBI)
  - US Food and Drug Administration (DEA)
- DCA boards and bureaus
- Special Investigation Units for Insurance Companies (SIU)



# Continuous Improvement Strategies

- Updating of policies, procedures and best practices
- Provide ongoing training in current issues, updates, and refreshers
- Monitor changes and trends in healthcare and law enforcement, including technology
- Develop and maintain relationships with stakeholders



# Enforcement & Investigation Strategic Goals 2022-2027

- Enhance the quality, thoroughness, and timeliness of DOI investigations to provide boards and bureaus with efficient services to protect consumers and employees.
- Strengthen communication with the boards and bureaus to provide updates and transparency on case progression.
- Standardize training for DOI staff to achieve consistency and maintain quality investigations.



# Questions?

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