Making the Most of a CIA
Laura Ellis, Senior Counsel, Office of Inspector General
Donna Thiel, Chief Compliance Officer, ProviderTrust
HCCA Compliance Institute
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Today’s Objectives
• Discuss what to do even before the CIA is finalized
• Discuss how to get past the “This isn’t fair” phase
• Discuss how to make the most of the expertise of the OIG, the IRO, Quality Monitor, Compliance Expert.
• Discuss tips on implementing a CIA

Role of the Compliance Officer
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• OIG Perspective
  • Should be involved in all facets of negotiations and implementations
  • Primary contact with the OIG during CIA period
  • An experienced Compliance Officer is a great asset.

Role of the Compliance Officer

• Provider Perspective
  • Must be involved in all facets of negotiations and implementation
  • Face of the Company
  • Voice of Compliance (outward facing and behind the scenes)
  • Biggest compliance cheerleader

Settlement is Imminent, Now what?
Settlement and CIA are imminent, now what?

• OIG Perspective:
  • Negotiations take up to a year – use this time to prep
  • Review other CIAs
  • Evaluate current Compliance Program
  • Evaluate current CCO
    • If a change is necessary; do it before the CIA is signed
  • CCO needs to be part of the CIA negotiations

• Provider Perspective:
  • CCO needs to be a part of all negotiations
  • Review other CIAs and your current CIA drafts
  • Create a basic plan from the draft CIA requirements
  • Complete a mini-gap assessment comparing CIA requirements and current Compliance Program
  • Begin discussing implementation strategies
  • Begin discussing resource needs (People and costs)

Relationships and Attitude Matter
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- **OIG Perspective:**
  - OIG “contact” is transferred from Negotiator to Monitor
  - Get to know your OIG Attorney ASAP
  - Set-up a call or meeting to discuss expectations
  - Good First Impressions Count – Attitude

- **Provider Perspective:**
  - Feeling frustrated
  - Feeling overwhelmed

- **Provider Perspective:**
  - Critical to success of CIA implementation
  - Primary source for CIA clarification
  - Relationship will build
  - Always listen and follow up
Tips for Getting the Most From Your CIA

• Start Early
  • Plan
  • Requirements
  • Teams
  • Project Plan
• Calendar – When Will Reports Be Due?
• Initial Risk Assessment

Tips for Getting the Most From Your CIA

• Buy-In From Organization
  • Leadership
  • Board
  • Communicate
• Purpose of CIA – Improve Compliance Program
Tips for Getting the Most From Your CIA

- Use Your Compliance Committee
  - Who Will Be On It?
  - Make It An Active Resource
  - Eyes and Ears
  - Involve in Every Aspect of Risk Assessment
  - Use to Make Case that Compliance Adds Value

Monitors, IROs, OIG – Resources?

- Provider Perspective:
  - Yes, Yes, Yes
  - Compliance Experts
  - Industry Experts
  - Expensive, why not get the most out of the money you are spending?

- OIG Perspective:
  - OIG – Resource for CIA Terms
  - IRO, Expert, Quality Monitor
    - Choose wisely if you select
    - You’re paying for them – so make the most of them
    - Get them to help you with your biggest risks
CIA survival tips

* OIG Perspective:
  * CIA: Tool or Burden?
  * Communicate with OIG Contact
  * Be Transparent with OIG Contact
  * Plan Long Term From the Start
  * What is the End Goal?

CIA survival tips

* Provider Perspective:
  * Don’t waste too much time feeling sorry for yourself
  * Leverage every resource
  * Listen, listen, listen,
  * Learn, learn, learn
  * Grow, grow, grow

Five Years Later…
Was It A Success?

• OIG Perspective:
  • Do You See Lasting Change?
  • Did You Get Most Out of CIA?
  • Do You Know Where Your Compliance Program Goes Next?
  • Is Your Leadership With You?

CIA is completed, now what?

• Provider Perspective:
  • Celebrate the strides you have made
  • Continue with your improved culture
  • Continue use of new or improved compliance tools
  • Celebrate

Benefits of having a CIA?

• Provider Perspective:
  • Expert resources you may not have had access to previously
  • Possibly new department resources
  • Compliance may become a higher priority to the organization
QUESTIONS

Contact Information

Laura Ellis
Office of the Inspector General
Senior Counsel
Laura.ellis@oig.hhs.gov

Donna J. Thiel
ProviderTrust
Chief Compliance Officer
Director, Compliance Integrity Division
dthiel@providertrust.com