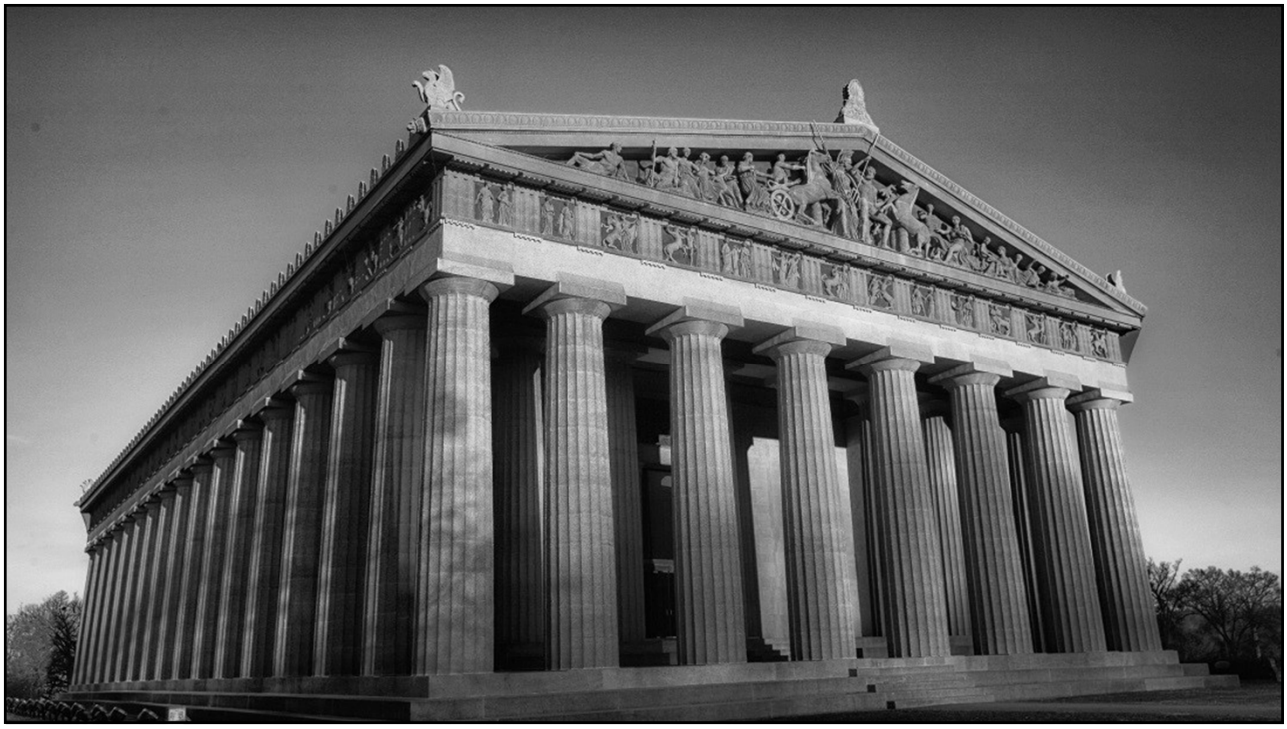
Daniel R. Levinson



Building Strong Health Care Institutions

- **Delivers quality care**
- **Enhances morale**
- **Builds trust and reputation**
- **Reduces costly mistakes**
- **Self corrects**

HHS-OIG

- Reduce vulnerabilities
- Reduce improper payments
- Promote safety/security
- Promote quality of care
- Hold wrongdoers accountable

Enforcement: When Compliance Fails

- Dr. Fata
- Hospice
- Prescription drug abuse
  - Opioids – Eye on Oversight video
  - Antipsychotics

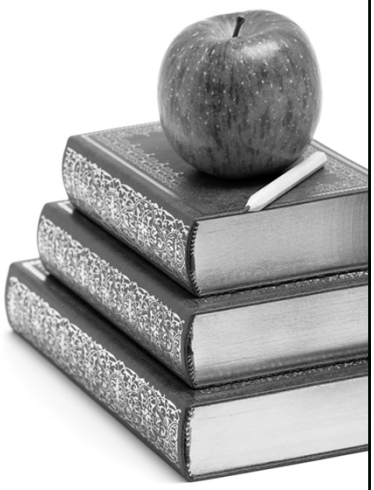
To Learn More:

ROB DECONTI

FALSE CLAIMS CASE

LAURA ELLIS

FRAUD RISKS/COMPLIANCE IN HOSPICE CARE



Compliance: The Better Path

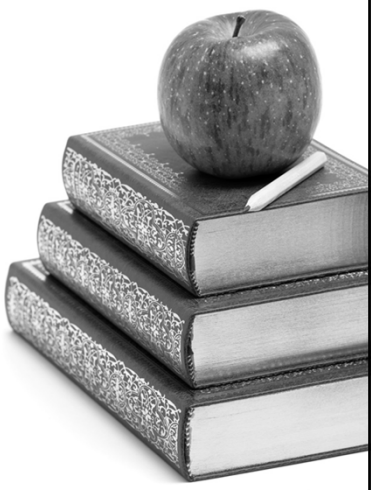
- **20 years of HIPAA compliance partnerships**
- **Evolving risks revealed in health care fraud cases and settlements**

To Learn More:

ANDREA TREESE BERLIN
LABORATORY COMPLIANCE

KATE MATOS
STRATEGIES TO INSTITUTIONALIZE COMPLIANCE

GLORIA JARMON
STRENGTHEN YOUR BILLING COMPLIANCE PROGRAM



OIG Enforcement-Compliance Balance

- **OIG assists provider compliance efforts**
  - **CPGs, alerts, bulletins, advisory opinions**
- **Enforcing consistent with OIG guidance**
- **Hold individuals accountable**
- **Integrity obligations, including CIAs**
- **Secure financial recoveries**
- **Exclude bad actors**

OIG Enforcement-Compliance Balance

Example 1:

NEW: Revised (b)(7) Exclusions Guidance

- **Discretion to exclude**
- **No compliance plan = negative**
- **Self-disclosure = evidence of effective compliance program**

OIG Enforcement-Compliance Balance

Example 2:

Corporate Integrity Agreement changes

- **More responsibility on providers**
- **Trust but verify that compliance plan is working**

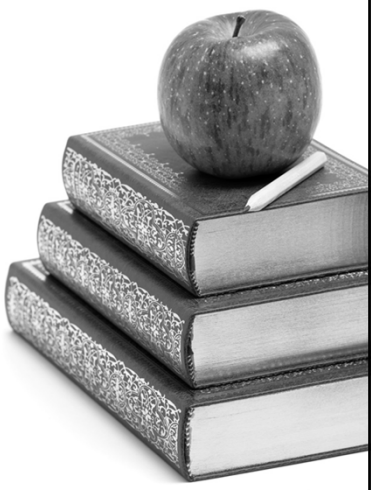
To Learn More:

LISA RE
SELF-DISCLOSURES

ROB PENEZIC
FEDERAL ADMINISTRATIVE SANCTIONS

SUSAN GILLIN
AVOIDING, NEGOTIATING, & COMPLYING WITH CIAs

FELICIA HEIMER
CIAs FOR SKILLED NURSING FACILITIES & BOARDS



Delivery System Reform

Evolving delivery system

- **Affordable Care Act**
  - **MSSP/waivers**
  - **Testing new models**
- **Physician Payment Reform Law (MACRA)**
  - **Merit-Based Incentive Payment System (MIPS)**
  - **Alternative Payment Models (APMs)**

Delivery System Reform

- **Health IT = critical infrastructure**
- **HHS investment in Health IT (HITECH Act)**
- **Health IT considerations**
  - **Data must be complete, accurate, and timely**
  - **Privacy and security safeguards**
  - **Appropriate implementation and use of Health IT**

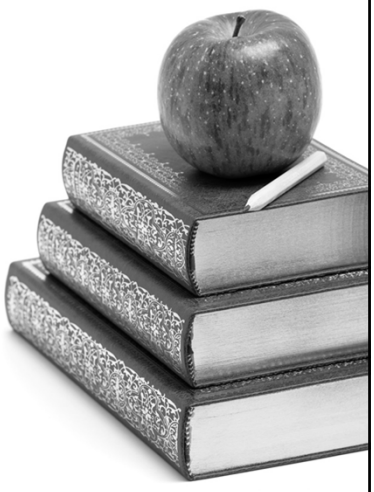
To Learn More:

MEREDITH WILLIAMS

NEW DEVELOPMENTS IN ANTI-KICKBACK AND STARK LAWS

AMANDA COPSEY

RISKS FOR POST-ACUTE CARE PROVIDERS IN COORDINATED CARE



Thoughts for the Future

- **The 4th Industrial Revolution**
- **Creative compliance leadership**
- **Technology and talent**

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