

Making the Most of a CIA

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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



Role of the Compliance Officer

- **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

Settlement and CIA are imminent, now what?

- **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

Relationships and Attitude Matter

- **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**

Relationships and Attitude Matter

- Provider Perspective:
 - Feeling frustrated
 - Feeling overwhelmed

Relationships and Attitude Matter

- 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

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?

- 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

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?

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



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