Top 10 Compliance Lessons From Recent Health Care Fraud Prosecutions
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1. Have more than a “robust” compliance plan.

2. If it’s too good to be true, it’s not true.

3. Preserve Records.

4. Self-Disclose.

5. Don’t assume that DOJ is waiting for a whistleblower.

6. Don’t direct or participate in the fraud.

7. Know who you employ.

8. Counsel and document.

9. Use peer review.

10. Don’t retain overpayments.

*The views expressed herein are the personal views of the speakers. Nothing in this presentation represents a position of the United States Department of Justice or the United States Attorney’s Office for the Eastern District of Missouri.