

Remedial – Specialty Medical Practice – U.S. Dept. of Justice Settlement (DOJ) and U.S. Dept. of Health and Human Services/Office of the Inspector General (HHS/OIG) Corporate Integrity Agreement (CIA)

1. Background – the Compliance Officer was tasked after a lengthy DOJ litigation concerning a Medicare coding issue which resulted in a multimillion dollar DOJ settlement and 5-year HHS/OIG CIA.
2. Project – to assist a multisite specialty practice with the implementation of and ongoing adherence with the CIA, including ensuring compliance with all government-funded payer laws, rules and regulations.
3. Results – after conducting an onsite assessment and meeting key staff, the Compliance Officer developed a written project plan. The Compliance Officer also vetted and provided recommended IRO candidates for the practice’s approval. In addition, the Compliance Officer supported the CIA’s implementation by developing and administering the required initial employee training for 650 physicians, executives, clinical and administrative staff located at 30 sites. Training sessions were variously provided in person and electronically throughout the term of the CIA. The Compliance Officer drafted the 60-day Implementation Report, which was accepted by the OIG. He also advised on revamping the practice’s billing and coding processes, including implementing coding review/audit and ongoing provider education processes. The Compliance Officer coordinated with practice’s IT Dept to develop a report for data transfer to IRO for the yearly audits. Finally, he developed the annual report format and drafted first several annual reports, all of which were accepted by the OIG with no sanctions.