

# 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



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## Role of the Compliance Officer



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### 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.

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### 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

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**Settlement is Imminent,  
Now what?**

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**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

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**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)

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**Relationships and Attitude Matter**

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**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

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**Relationships and Attitude Matter**

- Provider Perspective:
  - Feeling frustrated
  - Feeling overwhelmed

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**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

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**Tips for Getting the Most From Your CIA**

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**Tips for Getting the Most From Your CIA**

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

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**Tips for Getting the Most From Your CIA**

- Buy-In From Organization
  - Leadership
  - Board
- Communicate
- Purpose of CIA – Improve Compliance Program

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**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

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**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

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**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?

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**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?

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**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

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**Five Years Later...**

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**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?

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**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

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**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

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## QUESTIONS



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## Contact Information

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