HCCA Scottsdale Regional Conference

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The Purpose of Today’s Conversation...
Background

• Vice President, Chief Compliance and Privacy Officer, Phoenix Children’s Hospital

• U.S. Treasury Department OIG
• HHS OIG Senior Agent in San Diego Field Office
• SAC for Two Regions
  – Los Angeles Regional Office
  – Kansas City Regional Office
• Senior Executive
  – Assistant Inspector General
  – Deputy Inspector General

OIG Structure

Inception
• Office of Audit
• Office of Investigations

Discretion of the IG
• Chief Counsel
• Evaluation/Inspection
• Data/IT
• Management/Policy
• Hotline
Office Functions

- **OAS**
  - Examines Performance of Programs via Audit

- **OEI**
  - Practical Recommendations for Improving Program Operations

- **Investigations**
  - Criminal and Civil Investigations

- **OCIG**
  - Legal Support
  - Civil Monetary Penalties
  - Civil Settlements and CIA’s in Conjunction with OI/DOJ
  - Compliance Guidance and Advisory Opinions

State of the OIG
Qui Tam

- The Process
- The Relator
- Relator Interview
- Government Intervention
Subpoena Service

- Civil Investigative Demand
- OIG Subpoena Duces Tecum
- Grand Jury

Self Disclosure
Self Disclosure

• Protocol available on OIG and State websites
• Thorough and expeditious
• Benefits
  – Avoid invasive Government action
  – Lower multiplier
  – Potential to avoid CIA

Cooperate
The Mission

100% for Children