

CIA Success Story:

Settlement, Implementation, Effectiveness

Panel Participants

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Amerigroup CIA – Background

- Investigation, Trial, Settlement
- CIA Provisions
- Concerns & Struggles

Keys to Success: OIG Perspective

- Attitude
- Willingness to Change
- Resources
- Communication and Transparency
 - With OIG
 - With Employees and Other Contractors

OIG Perspective—Three Commitments

- Commitment to Plan Level Compliance
- Commitment to Inquiry
- Commitment to Compliance Auditing

Keys to Success: Company Chief Compliance Officer Perspective

- Business leadership buy in
- Demonstration of value to business
- Maturation in Compliance Program
- Relationship with OIG Monitor
- Compliance at local level
- Ongoing assessment of staffing needs

Chief Compliance Officer (cont'd.)

- Risk-based approach to identification, prioritization, and remediation of issues
- Continuity of IRO and Compliance Expert
- Enhancement of experience in conducting compliance reviews internally
- Transparent and frequent communication
- Development of systems/tools to track and demonstrate progress

Keys to Success: IRO Perspective

- IRO's job:
 - Be objective
 - Stay within scope
 - Understand role as auditor (GAGAS)
 - Create, execute and implement work plan to meet the terms of the CIA before implementation
 - Set expectations
 - Help interpret the CIA based on experience
 - Identify 'issues' / challenges and work to remediate them (qualitative v. quantitative)
- Recognize:
 - Both the OIG and the company need to define the terms and *interpret* CIA
 - Potential tensions that may exist after a settlement is reached

Keys to Success: IRO Perspective

- Manage your clients:
 - Recognize challenges with your clients (i.e., the OIG and the company) but be ready to present solutions or viable options
 - Be flexible with complex CIAs (i.e., logistics, PM, amendments, update work plan)
 - Know when to provide and seek direction in order to ensure that there are 'no surprises' and goals are achieved and deliverables are provided timely
- Establish main points of contact and communicate regularly

Learnings and Takeaways

1. Partnership
2. "It takes a village"
3. Staffing
4. Communication
5. Resources

Wrap Up

Questions?

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