# CORPORATE INTEGRITY AGREEMENT SUPPORT

A Corporate Integrity Agreement (CIA) is a document that specifies all of a health care organization's obligations under a civil settlement negotiated to resolve allegations of False Claims Act violations in lieu of being excluded from the federal health care programs. It serves as a binding contract between the health care organization and the Office of Inspector General (OIG). CIAs are typically lengthy and impose significant compliance obligations on the provider. Providers facing the prospect of a CIA, or a provider who is under a CIA, will have a significant compliance learning curve and potential challenges in meeting the many onerous and complex requirements and obligations associated with a CIA.

**Providers cannot and should not risk noncompliance with CIA obligations.** The penalties stack up for each day on noncompliance and can result in significant monetary penalties, extension of the CIA's term and up to exclusion.

## **OUR APPROACH**

Some providers do not know that certain terms in a CIA are negotiable. Our team members can assist providers in negotiating the terms of a CIA, which can help for the duration of the CIA term. Our deep experience working with a variety of

provider types – health systems, hospitals, hospice and large and small physician groups as well as varied CIAs (with claims reviews and focused arrangements), has enabled our team to develop proven workflows, policies and processes, and template reports to help clients navigate the full spectrum of CIA requirements, associated reporting and certification obligations.

#### HALL RENDER ADVANTAGE

Our experienced compliance team has assisted many providers in meeting the robust obligations of a new or existing CIA. We are an invaluable resource to the Compliance Officer. Hall Render and our compliance attorneys are well known and respected by OIG Monitors and OIG Counsel, which helps our clients gain credibility and trust with OIG. In certain circumstances, our attorneys have also served in the role of an Independent Review Organization to perform compliance reviews as necessary to meet the provider's CIA obligations which has given us a lens into the OIG's expectations.

## **LET'S GET STARTED**

Ensure that your health care organization can confidently manage risk and drive health care compliance by contacting Hall Render today.



#### **CONNECT WITH US**

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