

Lifecycle of a Government Investigation

A Healthcare Compliance Resource

A government investigation can be costly, both to an organization's reputation and their bottom line. Limiting the risk and costs is helpful to reaching successful outcomes. PYA has expertise and a proven track record in all phases of government investigations and repayment obligations. We are here when you need us.

1

Investigation

The Issue, Scope, and Actors

- Assist with initial assessment and root cause analysis
 - Coding, billing, and medical necessity audits
 - Valuation – *business, real estate leases, compensation arrangements (fair market value, commercial reasonableness)*
- For Civil Investigative Demands (CID), identify documents anticipated for healthcare compliance

2

Government Reports

Commonly Requested Government Reports

- Report on or appeal of statistically valid random sample for claims review
- Prepare preliminary audits and findings for counsel's internal investigation report to the requesting agency
- Self disclosure corrective action section

3

Corrective Action

Action Plan to Prevent Recurrence

- Assess compliance and audit programs
- Develop and implement corrective action plans
- Develop policies and procedures
- Develop and provide training (*employees, management, governing body / board*)

4

Consultant or Expert

Substantive Expert to Advise, Consult, or Provide Testimony / Reports

- Healthcare Topics:
 - Billing / coding
 - Revenue cycle
 - Finance
 - Compliance
 - Audit
 - Valuation
- Other Focus Areas:
 - Pharmacy
 - Lab
 - Research / life sciences
 - Forensic accounting

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Settlement

Damages Calculation, Mitigation Factors

- Perform audits to define time period and scope of issue
- Analyze data for extrapolation of damages and calculate pre-judgment interest
- Identify evidence of strength of compliance plan
- Identify evidence that corrective action plan is effective

6

Monitoring

Corporate Integrity Agreements (CIA) Requirements and Independent Review Organization (IRO)

- Serve as an experienced IRO and/or compliance expert
- Develop policies, training, and program requirements and assist in implementation
- Prepare reports/performance audits required by CIA or settlement agreements

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Post-Settlement

Client-Specific Requirements

- Develop compliance program improvements and assist with implementation
- Perform routine audits
- Develop relevant reports, dashboards, policies/procedures, and training regarding program changes

For more information, contact:



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