

LW CONSULTING, INC. PRESENTS

CHOOSING THE RIGHT INDEPENDENT REVIEW ORGANIZATION

A GUIDE FOR THOSE NAVIGATING
CORPORATE INTEGRITY
AGREEMENTS



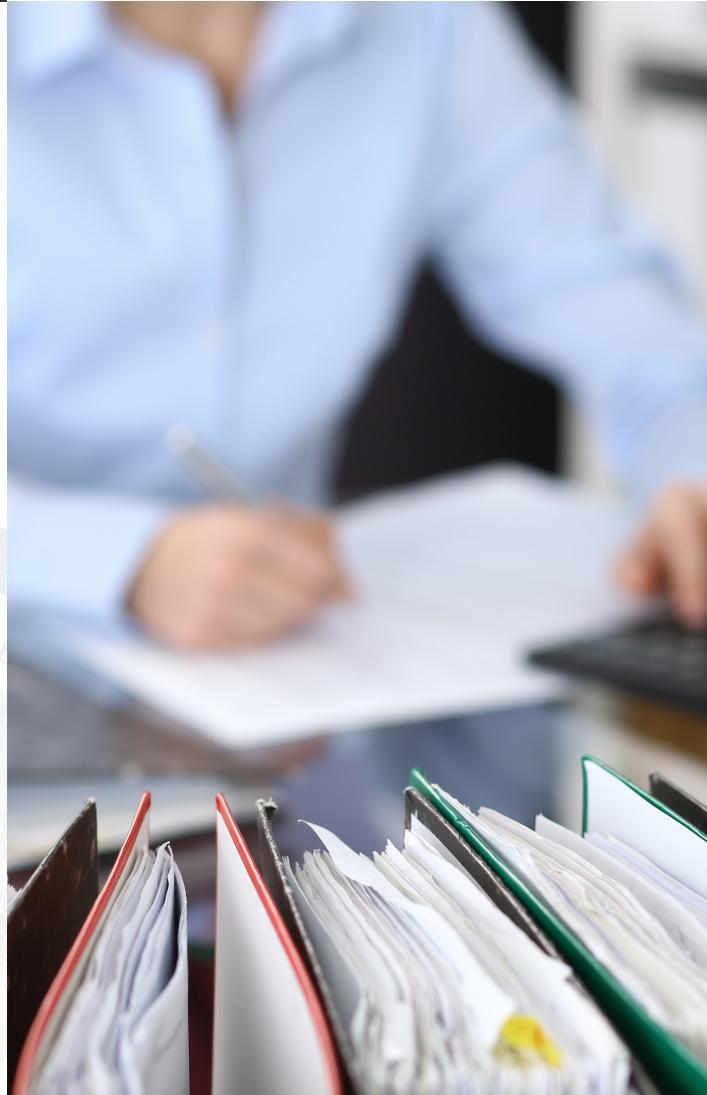
If your organization has found itself amid negotiating a Corporate Integrity Agreement (CIA), you may need the services of an Independent Review Organization (IRO). An IRO may be required to conduct an annual audit (generally for 5 years) and/or to conduct other activities the Office of Inspector General (OIG) believes necessary to reduce the risk of future overpayments. But what is an IRO, exactly, and how can it help you best?

Simply put, an IRO is an independent outside resource needed to fulfill reporting obligations under the terms of a CIA. When an organization enters into a CIA agreement, it is commonly required that a third-party organization be retained to conduct certain activities. Otherwise, the organization runs the risk of being non-compliant, violating the terms of the agreement, and may be liable for stipulated penalties. Once retained, the organization submits the name of the IRO to the OIG. The OIG may object to the IRO and require that an alternative IRO be selected.

While there are similarities between CIAs, each one is a unique document reflecting a unique set of circumstances. As one might expect, it's important that the IRO selected understands the specific terms as they apply to the organization. A CIA reflects the participating entity's requirements and circumstances. As a result, the work an organization does with an IRO will need to be based on the conditions that are most relevant to the parties involved.

The official website for the Office of the Inspector General (OIG) states "OIG negotiates corporate integrity agreements (CIA) with health care providers and other entities as part of the settlement of Federal health care program investigations arising under a variety of civil false claims statutes."

The same source also says that "Providers or entities agree to the obligations, and in exchange, the OIG agrees not to seek their exclusion from participation in Medicare, Medicaid or other federal health care programs."





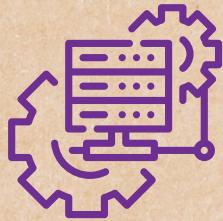
The burden of finding the right IRO can be a heavy one since it is up to the provider to determine the most appropriate accounting firm, law firm, or consultant to engage as its IRO. This relationship typically lasts five years.

Because of this, care needs to be taken when the IRO is being selected.

Finding the right fit is essential.

WHAT DOES AN IRO ACCOMPLISH?

To form an appropriate response to the demands of your CIA, an IRO can perform a number of tasks to meet CIA requirements:



Review Systems and Internal Controls

The IRO is directed by the CIA to review systems and internal controls that are in place to prevent overpayments. The independent, third-party perspective can provide information to help you improve your internal controls.



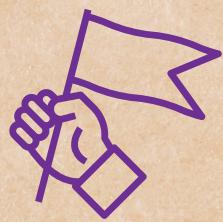
Audit and Other Activities

The IRO audit mimics a government audit in that the focus is on medical necessity and documentation requirements. The IRO's findings can be used to develop education programs that tackle the unique needs of your organization.



Objectivity

The OIG has posted a list of several reasons why IROs could try to be objective but end up failing. This includes the existence of conflicts of interest between the organization and the IRO. Without the right experience, organizations could cross this line without even realizing it.



Independence

The Government Accountability Office (GAO) has established standards for independence of an IRO. These standards are colloquially known as "The Yellow Book" and an IRO should have a thorough understanding of them.

Experience and Accountability

Any reliable IRO will have a record of competent service as well as the authority to work within the laws of whatever geographical boundaries impact your business. As always, specificity is a must—your CIA will dictate the scope of agreement needed with the IRO.

LW Consulting, Inc. is likely a good candidate for your IRO needs because we serve in this role for many different types of providers throughout the United States. We work across the healthcare continuum and have expertise as an IRO in cases that involve Skilled Nursing Facilities, Rehabilitation Services, Inpatient Rehabilitation Facilities, Long-term Acute Care Facilities, Behavioral Health Providers, Independent Diagnostic Testing Facilities (IDTF), Health Systems, Hospitals, and Physician Practices. We are also an experienced IRO for Diagnostic Providers and Medical Devices.



“As we began the process of selecting our IRO, we wanted to engage a company that had an auditing team with real world experience. We wanted accurate and trustworthy results that could add value to our rehabilitation, nursing and MDS programs. We have found that with LW Consulting. The LW team is professional, seasoned, and experienced. The therapists and nurses evaluating our teams and documentation understand the skilled nursing and therapy world. Many of them continue to work as on-call therapists. Their guidance and evaluation skills are founded in the real world of caring for our senior population. Our staff find the LW team to be genuine, knowledgeable, respectable and approachable. Once our IRO relationship ends with LW Consulting, we hope that we will be able to continue to utilize them in a consulting capacity for many years to come.”

Deborah M. Miller RN, JD
Chief Compliance & Privacy Officer
Ensign Services

LW Consulting, Inc.: The Choice for IRO Services

No matter where your organization provides services or what care settings are offered, LW Consulting, Inc. can be a valuable resource when an IRO is necessary. LW Consulting, Inc. distinguishes needs while fulfilling the required responsibilities. We pride ourselves on the work we have done as an IRO, and, if the need arises, would welcome the opportunity to work with your organization.

For more information, visit us
www.lw-consult.com or call us at
800-320-5401 to get started.

LW CONSULTING, INC.