

## Report on Medicare Compliance Volume 28, Number 25. July 15, 2019 OIG Fines Broward Health for CIA Failures, Stresses Collaboration

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Broward Health in Florida has paid a \$690,000 stipulated penalty for not complying with some requirements of its corporate integrity agreement (CIA), the HHS Office of Inspector General said July 10.

The CIA was imposed as part of Broward Health's \$69.5 million Stark-based False Claims Act settlement in 2015 over compensation for employed physicians ("Compensation for Employed MDs Who Lost Money Led to Hospital's \$69M Settlement," *RMC* 24, no. 33). In addition to implementing an effective compliance program, the CIA requires Broward Health to oversee its "focus arrangements," which are arrangements with referring physicians and entities that generate business for the health system.

Things haven't gone well until recently, when Broward Health overhauled its compliance program and corporate culture, according to compliance officials ("Road to Redemption? Broward Health Rebuilds Compliance Program; OIG Cited CIA Problems," *RMC* 28, no. 20). They expect Broward Health will be able to certify to OIG it has an operational compliance program.

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