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## **Quality of Care Corporate Integrity Agreements**

## Related

- Corporate Integrity Agreement Documents
- Corporate Integrity Agreement FAQs
- Quality of Care CIAs
- <u>CIA Compliance Resources</u>

When a False Claims Act settlement resolves allegations of fraud that impact the quality of patient care, OIG may enter into a "quality-of-care" Corporate Integrity Agreement (CIA) with the settling provider. Under this type of CIA, OIG requires that the provider retain an entity with clinical expertise to perform quality-related reviews. For example, some CIAs require the provider to retain an independent quality monitor that will look at the entity's delivery of care and evaluate the provider's ability to prevent, detect, and respond to patient care problems. Other quality-of-care CIAs require the provider to retain a peer review consultant to evaluate the provider's peer review and medical credentialing systems. Agreements may also require the provider to retain a clinical expert to review the medical necessity and appropriateness of certain admissions and medical procedures. If you or your organization are interested being an independent quality monitor, please see the OIG's Notice for Potential Monitors for Quality-of-Care Corporate Integrity Agreements.

When a provider enters into a quality-of-care CIA as part of a settlement, it is not an admission that the provider provided substandard or worthless patient care. The presence of a quality-of-care CIA, alone, is not determinative of the quality of care at the provider's facility or facilities. Nor does it guarantee that the provider will provide adequate patient care going forward. The quality-of-care CIA does, however, require the provider to appropriately respond to the monitor and/or consultant's recommendations for improvement to quality, peer review, and/or medical credentialing systems during the term of the CIA.

For skilled nursing facilities, nursing facilities, and hospitals, the Centers for Medicare & Medicaid Services' Nursing Home Compare and Hospital Compare Web sites are useful tools to obtain quality-of-care information about a specific facility.

Below are links to the current quality-of-care CIAs. Where the quality-of-care CIA is with a provider that has multiple locations, an individual location may have had no involvement in the settlement. Also provided are links to press releases issued by the United States Attorney's Office or the Department of Justice about the related False Claims Act settlements:

**Corporate Integrity Agreement** 

Related

Universal Health Services, Inc. and UHS of Delaware, Inc. Vanguard Healthcare, LLC, Vanguard Healthcare Services, LLC, Vanguard Financial, LLC,

Boulevard Terrace, LLC, Vanguard of Crestview, LLC, Glen Oaks, LLC, Imperial Gardens

Memphis Operator LLC dba Spring Gate Rehabilitation and Healthcare Center

N/A

Press Release

Press Release

Health and Rehabilitation, LLC, Vanguard of Memphis, LLC, Vanguard of Manchester, LLC, Elderscript Services, LLC, William Orand, and Mark Miller

Health Services Management
Andover Subacute and Rehab Center Services Two, Inc.
Daybreak Venture LLC and Daybreak Partners LLC

N/A <u>Press Release</u> <u>Press Release</u>