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2023 OIG compliance update: Where does your program stand one year out?

By Ahmed Salim

As organizations strive to maintain ethical practices and adhere to regulatory guidelines, the U.S. Department of Health and Human Services Office of Inspector General (OIG) plays a crucial role in ensuring compliance within the healthcare industry. The 2023 OIG compliance update brought forth new measures and guidelines that organizations must implement to enhance their compliance programs,[1] and although OIG deals specifically with healthcare, some of its directives can apply to any compliance program. This column will explore the key aspects of the update and discuss how organizations can measure their progress in implementing these updates over the past year.

Understanding the 2023 OIG compliance update

The 2023 OIG compliance update focused on strengthening compliance programs and addressing emerging risks in the healthcare industry. Key areas covered in the update include:

1. **Risk assessment**: Organizations were encouraged to conduct comprehensive risk assessments to identify potential vulnerabilities and develop strategies to mitigate them effectively.

2. **Policies and procedures**: The update emphasized the need for clear and concise policies and procedures that align with regulatory requirements.

3. **Training and education**: It is crucial for organizations to ensure that employees are well-informed about compliance policies and procedures.

4. **Auditing and monitoring**: Regular auditing and monitoring activities help identify potential compliance gaps and areas for improvement.

Measuring implementation progress

To assess the implementation of the 2023 OIG compliance update within your organization over the past year, consider the following steps:

1. **Review policies and procedures**: Evaluate whether your organization has updated its policies and procedures to align with the new guidelines.

2. **Conduct a risk assessment**: Determine if your organization has conducted a thorough risk assessment to identify potential vulnerabilities.

3. **Training and education**: Evaluate your organization's training and educational initiatives. Assess the frequency and effectiveness of these programs in promoting employee compliance awareness.

4. **Auditing and monitoring**: Review your organization's auditing and monitoring activities. Assess the frequency and comprehensiveness of these activities, ensuring they align with the updated guidelines.

5. **Compliance reporting**: Evaluate the effectiveness of your organization's compliance reporting mechanisms. Assess whether employees feel comfortable reporting potential compliance concerns and whether these reports are promptly addressed.

Conclusion

The 2023 OIG compliance update presents organizations with an opportunity to enhance their compliance programs and mitigate risks effectively. Regular evaluation and improvement of compliance programs will ensure that organizations stay aligned with regulatory requirements and maintain ethical practices in the ever-evolving compliance landscape.

[1] U.S. Department of Health and Human Services, Office of Inspector General, *General Compliance Program Guidance*, November 2023, https://oig.hhs.gov/documents/compliance-guidance/1135/HHS-OIG-GCPG-2023.pdf.

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