



When You Need a Seasoned, Experienced IRO, What Should You Look For?

If your organization is negotiating a Corporate Integrity Agreement (CIA) with the Office of the Inspector General (“OIG”), one of your new CIA obligations will be hiring a firm to serve as Independent Review Organization (IRO). Your new IRO will conduct periodic (typically annual) reviews – as required in the CIA – of your organization’s compliance with CIA requirements and with the requirements of Federal health care programs.

What Makes Arete’s IRO Team Unique?

Our experience managing IRO requirements – not only as an IRO service provider – but also as the compliance officers and senior compliance staff responsible for an organization’s successful CIA implementation, means we know how to conduct and facilitate an IRO review process that is consistent with all CIA requirements, and will help a provider organization successfully meet CIA obligations. We have managed the IRO process from multiple vantage points, including:



Serving as IRO for organizations who are subject to this CIA requirement



Managing the IRO process as chief compliance officer or compliance staff for organizations subject to CIAs



Assisting organizations with implementation and operation of CIA and IRO requirements as consultants and outside advisors

Our practical, seasoned approach to IRO engagements – steeped in years of hands-on experience building and operating successful compliance programs and processes – makes us unique in the community of IRO service providers.



Arete's IRO Personnel

Our background as compliance officers and compliance staff for provider organizations means that we bring our deep experience in design and implementation of compliance processes for Focus Arrangements, or for Medicare and Medicaid claims development and submission, to bear as we conduct IRO reviews.

Independent - Not Adversarial

As your IRO we understand what it means to be independent and to maintain our independence (as required by the CIA) – which means in part that in the IRO role we can't help you develop processes or implement corrective action plans. But we can suggest approaches or options that we have seen work in other organizations, and that you might consider as you implement and improve your compliance program and CIA required processes. While maintaining our independence, we are often able in this manner to help organizations better meet the requirements of their CIA.

Arete Compliance Solutions Offers a Uniquely Qualified IRO Team, Who Have:

- Served as IRO and/or Board Expert pursuant to recent CIA requirements
- Implemented and managed CIAs (including management of the IRO process) as chief compliance officer or senior compliance staff
- Attained decades of experience working with Medicare and Medicaid payment rules relevant to Claims Review IRO engagements, and with the requirements for submitting clean claims to governmental programs
- Conducted and designed claims audits and claims reviews in nearly every health care provider setting
- Trained as attorneys and have substantial operational experience with the requirements of the Stark Law and Anti-Kickback Statute, and with regulatory requirements relevant to Focus Arrangements IRO reviews
- (As compliance officers and compliance staff) designed, and in concert with management, implemented compliance systems and processes to assure compliance with Medicare and Medicaid payments rules, and with the requirements of the Stark Law and Anti-Kickback Statute

If you need an IRO please contact us. We would be honored to work with you to conduct this important CIA required review of your organization's compliance with CIA and Federal health care program requirements.

**At Arete Our Mission is to Help You
and Your Organization Succeed.**