

Q1 2025 Case Update

- January: no potential cases
- February: 1 potential case; report submitted to DHCS within 10 days.
- March: no potential cases (as of 3/13)
- *Pending cases with DHCS: 2 (one from Dec. and one from Feb.)*

FWA Process Update - Cotiviti

- 3/2/25: CCHP has completed a work order with Cotiviti to add additional FWA services
- Upgraded platform: Cotiviti 360 Review Pattern
 - More comprehensive tool to identify billing patterns and prevent FWA
- Special Investigative Unit (SIU): 2 FTEs to support CCHP with in-depth investigations

Compliance Workplan

- The Compliance Workplan has been updated and meets federal requirements
- Incorporates all seven core components as listed by the HHS Office of Inspector General (OIG)
- Includes requirements for ensuring:
 - Effective communication
 - Oversight and monitoring
 - Identifying risks
 - Preventing FWA



7 Elements of a Successful Compliance Program

1. Written Policies and Procedures
2. Compliance Leadership and Oversight
3. Training and Education
4. Effective Lines of Communication with the Compliance Officer and Disclosure Program
5. Enforcing Standards: Consequences and Incentives
6. Risk Assessment, Auditing, and Monitoring
7. Responding to Detected Offenses and Developing Corrective Action Initiatives