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OIG Issued Updated General Compliance Program Guidance for Healthcare Providers and Stakeholders

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On Monday, November 6, 2023, the U.S. Department of Health and Human Services Office of Inspector General (“OIG”) released its General Compliance Program Guidance (“GCPG”) for the general healthcare compliance community and other healthcare stakeholders. The GCPG generally covers the following topics:

- Overview of Various Federal Healthcare Laws, including the:
 - Anti-Kickback Statute
 - Physician Self-Referral Law
 - False Claims Act
 - Civil Monetary Penalty Authorities
 - Exclusion Authorities
 - Criminal Healthcare Fraud Statute
 - HIPAA Privacy and Security Rules
- Seven Elements for a Compliance Program Infrastructure
 - Written Policies and Procedures
 - Compliance Leadership and Oversight
 - Training and Education
 - Effective Lines of Communication with the Compliance Officer and Disclosure Programs
 - Enforcing Standards
 - Risk Assessment, Auditing, and Monitoring
 - Responding to Detected Offenses and Developing Corrective Action Initiatives
- Compliance Program Adaptations for Small and Large Entities
- Other Compliance Considerations
- OIG Resources and Processes

The GCPG can be accessed by following this link. Even though the GCPG is voluntary guidance for the healthcare industry, providers should review the GCPG and, as necessary, update their compliance plans. The OIG will publish industry-specific guidance in 2024, and our team will track and provide links once those resources are published.

