Corporate Integrity Agreement (CIA) Support Consulting

Last reviewed October 2026 · https://www.integralhs.com/corporate-integrity-agreement-support

What to have ready

Each item below ties to a term OIG describes in CIAs. Your own agreement controls where it differs.

- Your executed CIA and every appendix. Each agreement "addresses the specific facts at issue" (OIG [https://oig.hhs.gov/compliance/corporate-integrity-agreements/about-corporate-integrity-agreements/]), and the IRO qualifications "are outlined in an appendix to the CIA" (OIG CIA FAQ [https://oig.hhs.gov/faqs/corporate-integrity-agreement-faq/]).
- Appointment records for your compliance officer and compliance committee (OIG [https://oig.hhs.gov/compliance/corporate-integrity-agreements/about-corporate-integrity-agreements/]).
- Your current written standards and policies (OIG [https://oig.hhs.gov/compliance/corporate-integrity-agreements/about-corporate-integrity-agreements/]).
- Training content, rosters and completion records (OIG [https://oig.hhs.gov/compliance/corporate-integrity-agreements/about-corporate-integrity-agreements/]).
- Your IRO engagement letter and the appendix qualifications it must meet, including the claims review expertise OIG summarizes (OIG CIA FAQ [https://oig.hhs.gov/faqs/corporate-integrity-agreement-faq/]).
- Your confidential disclosure program procedure and its records (OIG [https://oig.hhs.gov/compliance/corporate-integrity-agreements/about-corporate-integrity-agreements/]).
- Your ineligible person screening procedure and screening records (OIG [https://oig.hhs.gov/compliance/corporate-integrity-agreements/about-corporate-integrity-agreements/]).
- A reportable event intake log showing the date each event was identified, against the reporting deadline in your CIA; OIG's FAQ states 30 days (OIG CIA FAQ [https://oig.hhs.gov/faqs/corporate-integrity-agreement-faq/]).
- Overpayment identification, payor notice and repayment records (OIG CIA FAQ [https://oig.hhs.gov/faqs/corporate-integrity-agreement-faq/]).
- A list of ongoing investigations and legal proceedings, which the agreement requires you to report (OIG [https://oig.hhs.gov/compliance/corporate-integrity-agreements/about-corporate-integrity-agreements/]).
- The due dates for your implementation report and each annual report (OIG [https://oig.hhs.gov/compliance/corporate-integrity-agreements/about-corporate-integrity-agreements/]).