

NATURE OR CIRCUMSTANCE OF CONDUCT

Was the misconduct ongoing or part of a pattern?



Were leaders of the organization involved in the misconduct?

CONDUCT DURING INVESTIGATION

Did the entity conduct an internal investigation?



Did the entity self-disclose misconduct prior to the government investigation?



Has the individual or entity accepted responsibility for the misconduct?

THE OIG

Newly Updated Fraud Criteria Categories

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What You Should Know

SIGNIFICANT AMELIORATIVE EFFORTS

Have the individuals involved been disciplined appropriately?



Has the entity dedicated more resources to compliance?

HISTORY OF COMPLIANCE

Does the entity have a compliance program incorporating the seven essential elements?