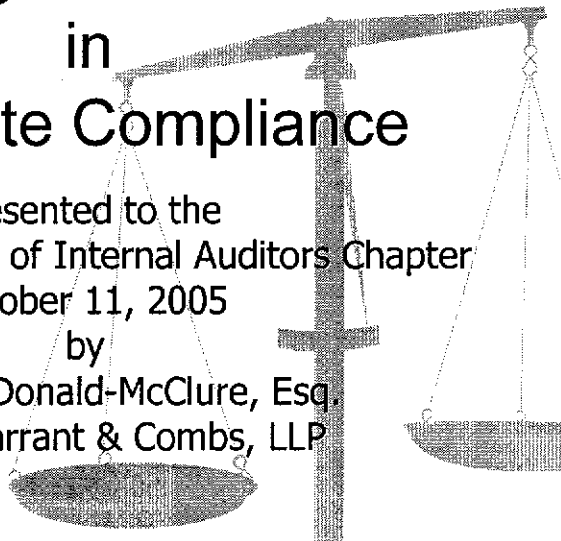


# Legal Issues in Corporate Compliance

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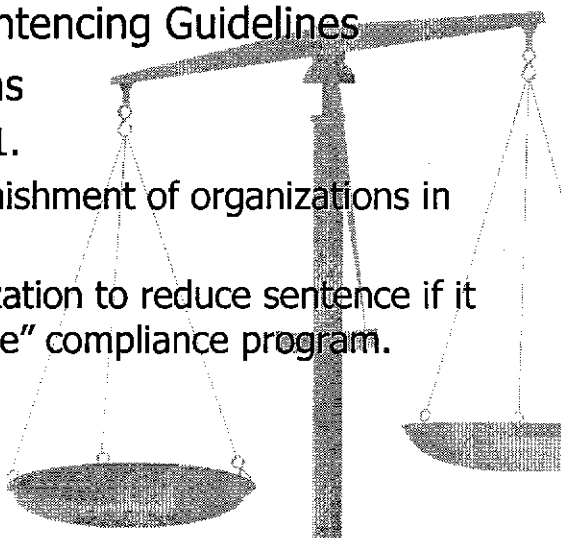
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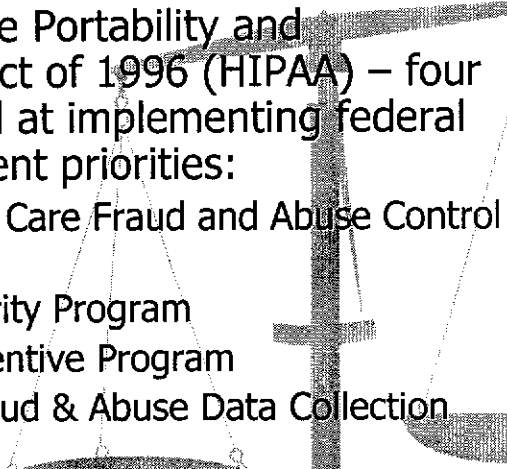
## Origin of Compliance Programs

### U.S. Federal Sentencing Guidelines for Organizations

- Enacted in 1991.
- Determines punishment of organizations in criminal cases.
- Enables organization to reduce sentence if it has an "effective" compliance program.



## Other Catalysts for Compliance Programs

- Health Insurance Portability and Accountability Act of 1996 (HIPAA) – four programs aimed at implementing federal fraud enforcement priorities:
    - National Health Care Fraud and Abuse Control Program
    - Medicare Integrity Program
    - Beneficiary Incentive Program
    - Health Care Fraud & Abuse Data Collection Program
- 

## Fraud & Abuse Control Program

Collaboration between

- United States Attorney General
- Health and Human Services (HHS) Department
- HHS Office of Inspector General (OIG)

Resulting in

- Recovery of >\$5.69 billion false payments from 1997 through 2003.
  - Convictions of >3,275 individuals in 2003.
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