

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 Exclusion Criteria Categories

.....

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?