

## Christi Anne Grimm

Date of Curriculum Vitae: April 2024

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### WORK EXPERIENCE

#### Inspector General (IG)

2/2022 – Present

#### U.S. Department of Health and Human Services (HHS), Office of Inspector General (OIG)

As Inspector General, leads an independent and objective organization of more than 1,600 auditors, evaluators, investigators, lawyers, and management professionals who carry out OIG's mission to protect the integrity of HHS programs, as well as the health and welfare of the people HHS programs serve. Ensures effective use of OIG's approximately \$432.5 million budget (2023 enacted) to oversee more than \$2 trillion in HHS expenditures. Responsible for overseeing HHS and all agencies operating within HHS, including the Centers for Medicare & Medicaid Services, the Administration for Children and Families, the Centers for Disease Control and Prevention, the Food and Drug Administration, and the National Institutes of Health. Recent accomplishments include:

- Collaborating with the Department of Justice to reach a \$172 million settlement with The Cigna Group (Cigna) and its subsidiaries for Medicare Advantage fraud connected to Cigna's chart review program, resulting in a corporate integrity agreement (CIA), which OIG will monitor, to deter future misconduct and enable the speedy discovery and reporting of improper behavior. The CIA sets an industry benchmark that other health insurance plans can use to assess and potentially improve their own compliance programs and sends a clear message that the Government will prosecute risk adjustment fraud.
- Combating opioid fraud by leveraging partnerships and using data to drive new investigations and support existing work, which resulted in 149 criminal actions in FY 2023. Through data analytics, targeted enforcement efforts, and partnering with public health officials, OIG holds accountable those who criminally benefit from drug diversion and connects treatment options to patients in need.
- Identifying operational challenges at the Office of Refugee Resettlement (ORR) that raise concerns about children's health and well-being and issuing recommendations that were implemented and resulted in improvements to facilitate the safe and timely release of unaccompanied children to sponsors.
- Leading oversight of CARES Act funding streams, including more than \$150 billion in Provider Relief Fund (PRF) activity and obtaining access to program data to successfully pinpoint and pursue fraud investigations involving these funds. Access to CARES Act, PRF, and related datasets has empowered OIG's partnership with the Department of Justice, resulting in multiple prosecutions.
- Serving as one of nine statutory IG members on the Pandemic Response Accountability Committee (PRAC). Led the design of the PRAC Strategic Plan unanimously adopted by PRAC members. Currently leads the PRAC Health Care Subgroup, which comprises IGs that oversee agencies providing or reimbursing health care services and/or providing a public health response at the Federal level. Facilitated coordination and sharing of data on COVID-related health care and public health response trends to provide coordinated oversight across agencies and programs. Led the PRAC Health Care Subgroup in publishing reports examining COVID-19 testing efforts and the use of telehealth and its associated program integrity risks.

#### Principal Deputy Inspector General (PDIG)

1/2020 – 2/2022

#### Performing Duties of the Inspector General, HHS-OIG

As Principal Deputy Inspector General, led OIG through a period of unprecedented challenges posed by the COVID-19 pandemic.

- Led the delivery of numerous high-profile and impactful products. These included a report

identifying more than \$9 billion annually in estimated Medicare Advantage risk adjusted payments supported solely through health risk assessments and chart reviews that generated high payments to plans but did not show beneficiaries received expected care. Oversaw law enforcement efforts targeting illicit telefraud and opioid schemes that lured unsuspecting beneficiaries through aggressive marketing tactics, resulting in the largest national health care fraud takedown in history, involving more than \$6 billion in alleged fraud losses.

- Advanced technological and analytical initiatives, including improvements to OIG's investigations-tracking database, artificial intelligence in grants oversight, and mining social data for referral exclusions.
- Led the production of a first-of-its-kind, cross-Department oversight product examining COVID-19 testing efforts for six Federal health care programs, including Medicare beneficiaries, military personnel, and Federal inmates during the first 7 months after declaration of the public health emergency.
- Led the design of and hosted the Forum on the Future of Global Health Oversight, where representatives from the U.S. Agency for International Development, the U.S. Department of State, The Global Fund, and the HHS Office of Global Affairs explored the future of global health and health care oversight for the COVID-19 response, as well as for relief and international assistance to combat HIV/AIDS.

#### **Chief of Staff to the Inspector General, HHS-OIG**

**8/2014 – 12/2019**

As Chief of Staff to the Inspector General, served as the second-highest-ranking career official at HHS-OIG and was directly responsible for effectively executing priority initiatives and providing counsel on a wide variety of policy and operational matters. Responsible for ensuring that OIG advanced innovation, focused on the most consequential work that was most likely to produce improvements in programs and in the lives of beneficiaries, and considered input from stakeholders. Served as an executive liaison responsible for communicating and coordinating with Government partners, national professional associations, and the private sector.

- Oversaw design, direction, and execution of all audits and evaluations involving the HHS response to the Zero Tolerance policy and the ORR's care of unaccompanied children. Work included identifying thousands of children not yet known to the courts who had been separated from their parents and released from HHS custody during the early implementation of Zero Tolerance in late 2017 and early 2018.
- Led national and cross-discipline initiatives to tackle critically important vulnerabilities facing HHS programs. Programs involved reimbursements for prescription drugs and opioid use disorder treatment. Initiatives ensured the safety of unaccompanied, noncitizen children; the quality and safety of home and community-based health care; and improved State-based Medicaid program integrity.
- Advocated for OIG's financial, human, and technical resource allocation needs. Instrumental in achieving a \$65 million funding increase from Congress between 2014 and 2017, thus enabling OIG to end a hiring freeze, launch new oversight activities, and make critical investments to modernize its IT infrastructure. Further enabled OIG to seamlessly transition to near-total remote operations during the COVID-19 pandemic without any loss in productivity.
- Operationalized OIG's Affirmative Litigation Team, leveraging unique enforcement authorities to independently bring civil monetary penalty actions when the Department of Justice could not support prosecution under the False Claims Act, and within 6 months of its launch realized a return of \$45 million to the Medicare trust fund.
- Responsible for the quality and timeliness of OIG work products amounting to more than 350 products generated in FY 2019, including OIG evaluations, fraud alerts, and annual reports. (The combined expected audit recoveries, questioned costs, and identified savings exceeded

\$2.5 trillion.)

### **Director of Policy and Programs, HHS-OIG**

**1/2013 – 7/2014**

Supervised day-to-day operations of the Immediate Office (IO) of the Inspector General consisting of the Chief Medical Officer, the Senior Counselor for Health Information Technology, the Office of Congressional Affairs, the Office of Regulatory Affairs, Office of Communications, the Office of the Executive Secretariat, and the Freedom of Information Act Office.

- Collaborated with budget and planning experts to align OIG resource requests with planned work and develop budget justification information submitted to appropriators. As part of this process, conducted cost-benefit analyses of proposed evaluations and audits to ensure projected human and financial capital investments were sound and reflected priorities.
- Led an IO team to chart a strategic direction and partnered with other organizational components to identify vulnerabilities in HHS programs and recommend changes for improvements.
- Regularly communicated with key HHS and congressional stakeholders and identified opportunities to better integrate key stakeholders' interests and concerns, as appropriate, into *OIG's Strategic Plan, Semiannual Work Plan, and Semiannual Report to Congress*.

### **Senior Policy Advisor to the Principal Deputy and Inspector General, HHS-OIG**

**11/2009 – 1/2013**

Advised and represented the IG and PDIG on OIG policy, operations, and program matters. Worked closely with managers and staff to set strategies and lead priority initiatives.

- Advised the IG on policies, procedures, and issues that had a major impact on HHS programs.
- Regularly prepared written products and oral presentations on behalf of the IG and PDIG for senior officials serving in HHS; Congress; other Federal, State and local government agencies; public interest groups; industry; members of the press and media; and the public.
- Ensured quality of OIG public communications on a range of topics, including quality of care and safety in hospitals receiving Medicare payments; oversight, management, and expenditures of the President's Emergency Plan For AIDS Relief funds; and private health insurance submissions to the Healthcare.gov plan finder.

### **Senior Program Analyst, Office of Evaluation and Inspections, HHS-OIG**

**8/1999 – 11/2009**

Applied program knowledge and technical skills to gauge potential risks to programs and beneficiaries. Designed, managed, and executed award-winning national evaluations of HHS programs and policies.

- Accrued and applied master-level skills in all facets of evaluation, including design, data collection and analysis, and report writing to produce relevant and high-impact evaluations.
- Led evaluative efforts to examine high-profile, priority health care topics, including how to identify adverse events (patient harms) in hospitals, Medicare and Medicaid provider screening and enrollment, beneficiary eligibility for insurance and temporary financial assistance, Medicare contractor oversight, collection of improper payments, and the Medicare appeals process.

### **Insurance Specialist, Centers for Medicare & Medicaid Services, HHS**

**1/1999 – 8/1999**

Conducted program evaluations for Medicare Part A and Part B contractors in Nebraska, Texas, New York, Florida, and Puerto Rico. Led several teams of insurance specialists to examine contractor compliance with local and national medical review policies and procedures.

### **Congressional Testimony and Significant Briefings**

- House Committee on Energy and Commerce, Subcommittee on Oversight and Investigations: *Insights from the HHS Inspector General on Oversight of Unaccompanied Minors, Grant Management, and CMS*, April 2023

- House Committee on Oversight and Reform: *HHS-OIG Coronavirus Oversight*, May 2020
- House Committee on Energy and Commerce, Subcommittee on Oversight and Investigations: *Combating Waste, Fraud, and Abuse in Medicaid's Personal Care Services Program*, May 2017

## Key Presentations and Interviews

- **RISE Conference**, *Cultivating Trust Through a Culture of Compliance*, March 20, 2024
- **HCCA**, *27<sup>th</sup> Annual Compliance Institute*, keynote, April 24, 2023
- **RISE Conference**, *OIG's Vantage on Medicare Advantage*, March 7, 2023
- **Pandemic Response Accountability Committee Agile Oversight Forum**, Inspector General Fireside Chat on Agile Oversight, January 25, 2023
- **Federal News Network**, *The Search for Accountability*, August 2, 2022
- **Health Care Compliance Association (HCCA)**, *26<sup>th</sup> Annual Compliance Institute*, keynote, March 29, 2022
- **Compliance Today**, *Meet Inspector General Christi A. Grimm: Never Lose Sight of the Vital Role Compliance Plays*, July 2022
- **HCCA**, *HHS-OIG Update on Compliance*, keynote, April 19, 2021
- **American Health Law Association (AHLA)**, *Connecting the Dots: An OIG Update*, keynote, Fraud and Compliance Forum, October 2020
- **HCCA**, *OIG Update*, keynote, 2020 Virtual Compliance Institute, March 30, 2020
- **CBS Evening News**, *Thousands More Migrant Children May Have Been Separated From Families*, January 2019

## KEY JOURNAL ARTICLES

- “New Report: Gains in Patient Safety Have Stalled Over the Past Decade,” Opinion by C.A. Grimm, R.A. Dorrill, and J.K. Taitsman, *STAT News*, June 2022.
- “Addressing Concerns About Improper Denials in Medicare Advantage,” C.A. Grimm and J.K. Taitsman, *Modern Healthcare*, May 11, 2022.
- “Four Crucial Lessons for Improving Covid-19 Testing,” Opinion by C.A. Grimm and M.E. Horowitz, *CNN.com Opinion*, April 9, 2021.
- “Why Drug Prescriptions Should Include Diagnoses,” C.A. Grimm and J.K. Taitsman, *STAT News*, March 2021.
- “Medicare Advantage Should Not ‘Game the System’ But Prioritize Patient Care, Honest Billing,” C.A. Grimm, *HealthcareDive*, September 2020.

## EDUCATION

- Harvard University, Kennedy School of Government, Senior Managers in Government
- American University, Experienced Leaders in the OIG Community
- New York University, Robert F. Wagner Graduate School of Public Service, Master of Public Administration in Health Policy
- University of Colorado at Denver, Bachelor of Arts in English