

# Darrell W. Contreras, Esq., CHC-F, CHRC, CHPC

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## Objective

A 28-year experienced compliance officer and attorney with extensive consulting, compliance, privacy, risk management and internal audit experience whose innovative approach to compliance has successfully driven organizational adoption of a culture of compliance

## Professional experience

2015 – Present

Millennium Health, LLC

San Diego, California

### Chief Compliance Officer

- Developed and led the Company's compliance efforts to implement and comply with its Corporate Integrity Agreement executed October 2015;
- Developed and implemented the plan to maintain the Company's Compliance Program after successful release from its Corporate Integrity Agreement in March 2021;
- Established Compliance Program effectiveness scoring and reporting methodology to facilitate Board monitoring of the Compliance Program based on the OIG/HCCA publication, "*Measuring Compliance Program Effectiveness: A Resource Guide*";
  - Created auditable documentation for all 401 effectiveness metrics addressing the seven elements of a corporate compliance program;
- Successfully implemented all requirements for 90-day and 120-day reporting periods and all five Annual Reports, including supplemental requests for information, required under the Company's Corporate Integrity Agreement;
- Developed tracking materials/programs to monitor implementation of all Corporate Integrity Agreement elements;
- Established solid working relationship with OIG Monitor assigned to oversee the Company's successful completion of its Corporate Integrity Agreement with no assessed penalties, breaches, or material breaches;
  - A stipulated penalty or exclusion was assessed for approximately 10% of the Corporate Integrity Agreements that were entered into after the Company executed its Corporate Integrity Agreement
- Coordinated and oversaw the engagements of the Independent Review Organization and the Board's Compliance Expert to timely comply with the Corporate Integrity Agreement requirements
- Implemented an annual field force monitoring program consisting of 50 full-day observation rides with sales personnel;
- Used the OIG's Compliance Program Effectiveness Resource Guide to develop a process to document, monitor and report to the Board on the 401 effectiveness metrics as applied to the Company's Compliance Program;
- Created a single-page Standards of Conduct for the Company, including a roll-out plan that reinforced awareness and provided documented results of engagement;
- Utilized trending and root cause analysis to address repeated compliance issues;
- Built a culture of compliance throughout the Company through engagement with departments, creative training methods, and guidance, including the Company's national sales force and Laboratory Service Assistants placed at practices throughout the United States;
- Created an innovative approach to the Company's Compliance Training session in which 97% of the Company's employees actively participated in a single, live hour and 15 minute Compliance Training Session;

- Presented compliance training at National Sales Meetings that utilized innovative methods to actively engage the salesforce in how to sell compliance as a service differentiator;
- Supported the Company's operational initiatives by serving as a member of Executive Leadership to provide compliance guidance to develop parameters for new programs and initiatives;
- Initiated, conducted, and reported on compliance investigations, including close working relationships with Legal Counsel and Human Resources;
  - Coordinated refunds and repayments with the Revenue Cycle department when required;
  - Implemented a compliance issue tracking database to document and report on compliance issues, including trending reports.
- Developed report format and reported to the Board of Directors on a quarterly basis and more frequently as needed that concisely reported on all Compliance Office activities;
- Conducted annual risk assessment and implemented an annual Compliance Work Plan that included development and oversight of the Compliance Work Plan projects, including bi-weekly progress reports;
- Served as the Company's Privacy Officer and provided guidance and training on HIPAA;
  - Worked closely with the Company's Chief Information Officer and Chief Security Officer to address information security matters including responses to customers requesting network security attestations.
- Developed Compliance sub-committees to address risk sectors specific to the Company's risk profile;
- Developed dynamic training programs to teach and train on compliance topics;
- Participated in departmental meetings and conference calls to promote compliance throughout the Company;
- Responsible for developing and monitoring department budget of approximately \$1.2 million annually.
  - Year-end actuals were favorable to budget in every year and was approximately \$140,000 favorable on CIA-related fees.

2010 – 2015

JD HealthCare Partners, LLC

Lakeland, Florida

**Partner/Founder**

Established an LLC to provide consulting and advisory services to pain management clinics and providers to assist them with compliance with state and local laws, rules and regulations

- Created a consulting and training program for pain management clinics to improve compliance with state laws and regulations;
- Provided compliance advisory and consulting services to hospitals, billing companies, medical practices, clinical laboratories, and treatment centers;
- Served as Vice President of Compliance Services for Musculoskeletal Regulatory Clinical Advisors, a consulting firm that provides healthcare consulting services to medical device, pharmaceutical, and biotech companies. Specific responsibilities include:
  - Served as contracted Chief Compliance Officer for medical device companies, assuming responsibility for operating and overseeing the Compliance Program;
  - Developed Compliance Programs for medical device companies based on the published Compliance Program Guidance;

- Interacted with client employees, contractors, and consultants at all levels to facilitate compliance issue response, investigation, and remediation process;
  - Educated client Boards regarding key compliance risks and regulatory obligations;
  - Provided compliance consulting services including: infrastructure development, compliance training, and assistance with responding to reported compliance concerns;
  - Developed documentation to evidence the effectiveness of the Compliance Program for due diligence efforts;
  - Developed a methodology for start-up medical technology companies to scale development of the compliance program to the growth of the company;
  - Drafted response documents for clients in response to requests to sign a HIPAA Business Associate Agreement;
  - Provided internal compliance guidance and education;
  - Guided clients in preparing and submitting compliant reports on payments to physicians for Federal and state reporting.
- Developed, implemented and audited HIPAA Privacy and Security programs for healthcare clients;
  - Assisted with the implementation of protocols to support medical necessity for controlled substance prescriptions, laboratory testing, and external referrals, including advising on documentation of treatment plans and patient goals;
  - Worked with legal counsel to respond to Medicare appeals and denials for medical necessity for clinical laboratory testing;
  - Worked with physician legal counsel to prepare response to licensure actions against physicians before Boards of Medicine.
  - Developed a comprehensive audit program to apply an internal auditing methodology to compliance with the Standards of Practice for Physicians Practicing in Pain Management Clinics;
  - Developed a Reference and Policy manual for to assist pain management clinics with compliance with the HB 7095 passed as part of the 2011 Florida Legislative Session;
  - Provided consulting and advisory services to pain management clinic physicians and staff on compliance with state laws and regulations;
  - Developed tools and guidelines for physician practices to improve documentation of the care provided to patients.

2007 – 2010

Lakeland Regional Medical Center

Lakeland, Florida

**Chief Compliance Officer, Director Corporate Integrity Services**

- Responsible for the management of the Corporate Integrity Services (CIS) department, including 4 FTEs;
- Responsible for the day-to-day operation and on-going effectiveness of the Lakeland Regional Health Systems Compliance Programs;
- Responsible for ensuring system-wide compliance with the Health Insurance Portability and Accountability Act of 1996 (“HIPAA”);
- Responsible for the Lakeland Regional Health Systems Internal Audit program and served as the organization’s Chief Audit Executive;
- Responsible for oversight of the organization’s research activities as the Research Integrity Officer;
- Collaborated with other LRMC Directors as part of the Operations Leadership Committee (OLC) to manage and oversee the daily operations of the health system;
- Completed Lean Six Sigma Green Belt training.

2003 – 2007

Maricopa Integrated Health System

Phoenix, Arizona

**Chief Compliance Officer**

- Responsible for the management of the MIHS Compliance Office;
- Responsible for the day-to-day operation and on-going effectiveness of the MIHS Compliance Program;
- Led and completed the transfer of all health system licenses from Maricopa County ownership to Health Care District ownership;
- Responsible for ensuring system-wide compliance with the Health Insurance Portability and Accountability Act of 1996 (“HIPAA”);
- Led efforts to improve compliance awareness for the Graduate Medical Education program;
- Assumed reporting responsibility for the Risk Management department and served as the liaison between contracted internal audit and the Finance, Audit, Compliance and Ethics Committee of the Board of Directors.

1996 – 2003

Ernst & Young, LLP

Phoenix, Arizona

**Manager – Health Sciences Advisory Services**

- Developed and implemented multiple compliance programs for health care companies including a California Medicaid plan and a California-based commercial health plan.
- Developed methodology and conducted compliance program assessments for health care organizations across the country.
- Created a compliance risk assessment process for health care organizations and translated the results of the risk assessment into a compliance office workplan.
- Assessed compliance programs for health care organizations under a Corporate Integrity Agreement in the Independent Review Organization function and reported the results of the assessments to the OIG.
- Mentored and trained multiple Compliance Officers in multiple facilities across the country.
- Assessed and implemented Privacy Programs in accordance with the Health Insurance Portability and Accountability Act (HIPAA) privacy regulations for health care organizations across the United States including Texas county health plan.

**Presentations  
and Seminars**

Faculty/Presenter for the following Compliance and HIPAA related programs:

- Faculty, Health Care Compliance Association Compliance Academy (August 2011-present), topic: HIPAA Privacy & Security
- Faculty, Health Care Compliance Association Privacy Compliance Academy (October 2010-present), topics: Integrating Compliance and Privacy, Privacy Compliance Beyond Implementation
- Health Care Compliance Association Annual Compliance Institute (April, 2014-2023)
- Health Care Compliance Association – Healthcare Enforcement Compliance Conference (November 2021 - 2024)
- Health Care Compliance Association, Board Audit and Compliance Committee (February 2017 – 2020, 2023)
- American Bar Association National Institute on Health Care Fraud (May 2024)
- Faculty, Compliance Certification Board – Certified in Healthcare Compliance (CHC) examination (July 2011 – October 2017)

- Florida Academy of Pain Medicine Annual Scientific Meeting (2012 – 2014)
- Florida Society of Interventional Pain Physicians Annual Meeting (Orlando, FL – May 2011)
- Health Care Compliance Association Southeast Regional meeting (Orlando, FL – January 2011)
- Faculty, Compliance Certification Board – Certified in Healthcare Privacy Compliance (CHPC) examination (January 2010 – October 2017)
- American Society of Health System Pharmacists Mid-Year Clinical Meeting (Las Vegas, NV – December 2009)
- VHA Southeast Region Annual Meeting (Destin, FL – October 2009)
- Florida Health Information Management Association Annual Meeting (Orlando, FL – July 2009)
- Health Care Compliance Association Compliance Institute (Las Vegas, NV – April 2009)
- Health Care Compliance Association Compliance Institute (New Orleans, LA – April 2008)
- Health Care Compliance Association Compliance Institute (Chicago, IL – April 2007)
- Health Care Compliance Association 10<sup>th</sup> Anniversary Compliance Institute (Las Vegas, NV – April 2006)
- Compliance Program Effectiveness Audio Conference (National Audioconference – July 2002)
- American Association of Health Asset Managers – Regional Conference (Brainard, MN – May 2002)
- Health Care Compliance Association National Congress (Chicago, IL – April 2002)
- Other Regional and state professional association conferences across the United States (1998-2001)

**Professional memberships, licenses and qualifications**

State Bar of Arizona – Active Member in Good Standing 1996 – 2022; Inactive Member 2023 – present;  
Florida Licensed Healthcare Risk Manager – February 2011-February 2017  
Certified in Healthcare Compliance – February 2007  
Certified in Healthcare Compliance Fellow – June 2013  
Certified in Healthcare Research Compliance – October 2008  
Certified in Healthcare Privacy Compliance – September 2010  
Lean Six Sigma Green Belt trained  
Health Care Compliance Association  
Certified Flight Instructor – Airplane Single Engine Land, Multiengine Land, and Instrument  
Commercial Pilot – Airplane Single Engine Land and Multiengine Land

**Publications**

*The Lab Rental Space Sham*, Compliance Today, August 2024

*Ice cream, passwords, and building a culture of compliance*, November 2023

*A Simple Revolution: Rethinking an Effective Code of Conduct*, Compliance Today, June 2020

*Meet Darrell Contreras*, Compliance Today, February 2017

Compliance 101, 4<sup>th</sup> Edition, *HIPAA Privacy and Security* chapter, 2016

Health Care Privacy Compliance Handbook Second Edition, Editor, 2014, 2020, 2025

*Pill Mills* (with Angela Huskey, PharmD, CPE), Pain View, Winter/Spring 2012

*Teachable Moments: How a local disaster provided a HIPAA training opportunity*,  
Compliance Today, June 2008

*Employee Education about False Claims Recovery: A case study in compliance with  
the Deficit Reduction Act of 2005*, Compliance Today, November 2006

*Developing Sampling Techniques for an Effective Compliance Program*, Journal of  
Health Care Compliance, August-September 2002

*Free Press v. Fair Trial: Protecting the Criminal Defendant's Rights in a Highly  
Publicized Trial by Applying the Sheppard-Mu'Min Remedy*, Southern California Law  
Review, Volume 69, May 1996, Number 4 (with Charles H. Whitebread)

## Education

### **2010 Risk Management Certificate**

University of Florida

Gainesville, Florida (online)

### **1996 Juris Doctor**

University of Southern California Law School

Los Angeles, California

### **1993 Bachelor of Arts, Political Science**

University of Southern California

Los Angeles, California

### **1988-1990 Major - Systems Engineering**

United States Naval Academy

Annapolis, Maryland