



AHLA

# Fraud and Compliance Forum

September 27-29, 2015

Hilton Baltimore Hotel • Baltimore, MD

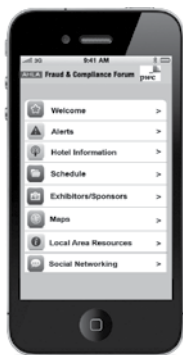
## Program Planning Committee

Robert G. Homchick, Chair  
Joan P. Dailey  
J. Reginald Hill  
John E. Kelly  
Katherine A. Lauer  
Albert W. Shay

## Program Learning Objectives

- » Gain a greater understanding of regulations (Stark, False Claims Act, Anti-Kickback Statute) and enforcement efforts in these areas
- » Learn how emerging regulatory trends, recent case law and legislative development will affect legal and compliance practices in health care
- » Network with peers and learn about the challenges and risk areas faced by plans and providers

## Download the AHLA App!



Put all the program details in the palm of your hand with the AHLA App! This free app is available in the iTunes App store or Google Play store by searching 'AHLA'. Download AHLA, by Bravura Technologies, onto your mobile device and hit open. Choose 'Events' to find the Fraud and Compliance Forum. Click on the event (you'll be prompted to enter your email address). You will not be able to access the event features of

a program if you are not registered for the event. The App will include the agenda, attendee list, and access to the PowerPoint presentations.

Event App sponsored by



Health Solutions

*HealthCare Appraisers, Inc. and FTI Consulting have provided sponsorship in support of this program.*

## Exhibitors

- » Affiliated Monitors, Inc.
- » Altegra Health
- » Bloomberg BNA
- » BRG Healthcare
- » Cardiovascular Peer Review
- » FTI Consulting
- » HCCS, A HealthStream Company
- » HealthCare Appraisers, Inc.
- » HealthCare Compliance Network
- » HORNE LLP
- » iContracts, Inc.
- » MediTract Inc
- » Navigant
- » Ntracts LLC
- » Pinnacle Healthcare Consulting
- » PricewaterhouseCoopers LLP
- » Protenus, Inc.
- » PYA
- » VMG Health
- » Wipfli LLP
- » Wolters Kluwer



*PYA has provided sponsorship in support of the Fraud and Abuse Practice Group luncheon and eProgram.*



## Live Tweet the Program

#AHLA15

Will you be in Baltimore for the Fraud and Compliance Forum? We encourage you to live tweet @healthlawyers so that attendees can learn from more than one session at once, and so that members unable to attend still feel plugged in. Would you like to live tweet one or more sessions of the program from a Practice Group Twitter handle? If so, please email Brian Davis at [bdavis@healthlawyers.org](mailto:bdavis@healthlawyers.org).

Live Twitter Feed Sponsored by



## SUNDAY, SEPTEMBER 27, 2015

12:30 pm-5:30 pm

### Registration and Information

#### CONCURRENT SESSIONS

1:00-2:30 pm Extended Sessions

##### A. Stark Law Primer (not repeated)

*Troy A. Barsky*

*Joan P. Dailey*

- » The Statute and regulatory issuances
- » Exceptions to the prohibition
- » Difference between Stark and Anti-Kickback
- » Addressing violations of the physician self-referral law

##### B. Compliance Primer: How Do You Know if Your Compliance Program is Effective? (not repeated)

*Katie Arnholt*

*Marti Arvin*

- » Decide what is an “effective” compliance program
- » Metrics and documented processes to determine compliance program effectiveness
- » Learn from effective aspects of other providers’ compliance programs

##### C. Moving to Outcome-Oriented Care: Regulatory and Enforcement Challenges

*David S. Greenberg*

*Christopher C. Sabis*

*Nolan S. Young*

- » Policy directive from HHS on new payment methodologies and desire to switch Medicare reimbursement “from volume to value”
- » Models being implemented to experiment with outcome-oriented care (ACOs, provider-provider integration, Medicare Advantage incentive plans, capitation)
- » New payment methodologies do not neatly align with current regulatory and enforcement schemes
- » Regulatory risks, including (i) state licensure issues, (ii) state regulation of insurance and capitated arrangements, (iii) Stark laws and anti-kickback law concerns, (iv) antitrust issues, (v) gain sharing, and (vi) False Claims Act
- » Enforcement concerns: Do past enforcement actions shed light on future government enforcement as we transition to outcome-oriented care?

2:45-4:15 pm Extended Sessions

##### D. False Claims Act Primer (not repeated)

*Edward Crooke*

*Michael Paulhus*

- » Traditional FCA liability grounds
- » Qui tam provisions
- » Investigation of a False Claims Act case
- » Damages and penalties issues
- » Settlement issues
- » Recent trends

##### E. Legal and Compliance: Roles and Responsibilities

*Jenny Barnes*

*Julie E. Chicoine*

*Anthea Daniels*

- » The decision to self-report: getting all on board?
- » The making of a qui tam relator
- » The delicate dance between legal’s oversights and compliance’s clean-up
- » Best practices for a working relationship
- » Policies and procedures
- » The laws of self-disclosure
- » The privilege—are you protected?

4:30-5:30 pm

##### F. Anti-Kickback Primer (not repeated)

*Kevin R. Barry*

*David E. Matyas*

- » Overview of the Statute
- » Exceptions and safe harbors
- » OIG guidance
- » Case law
- » Self-disclosures

##### G. HIPAA Compliance Primer (not repeated)

*Adam H. Greene*

- » Covered entities, business associates, and who falls outside of HIPAA
- » The relationship between the HIPAA statute, the HITECH Act, the Privacy, Security, and Breach Notification Rules, and the Transaction Standards
- » The Privacy Rule’s limits on uses and disclosures, individual privacy rights, and administrative requirements
- » The Security Rule’s requirements for administrative, physical, and technical safeguards
- » The Breach Notification Rule’s notification requirements

##### H. Corporate Integrity Agreements: Lessons Learned from Implementation, for Companies with and without a CIA

*Michael B. Lampert*

*Thomas F. O’Neill*

*Wes Porter*

CIA’s reflect substantial and long-term commitment to maintaining an effective compliance program. The governance, compliance and quality of care/patient safety obligations established by CIA’s are a rigorous reality for companies that are, or will soon be, parties to a CIA. They also should inform compliance initiatives and work plans developed by organizations with no CIA on the horizon. For example:

- » How should companies view the permissive exclusion criteria that lead to the decision of whether a CIA (rather than exclusion) is the right outcome? What do the criteria mean to those not currently negotiating with HHS-OIG?
- » How should companies view CIA-like obligations imposed by agencies other than HHS-OIG?

- » What is really behind common CIA provisions, and what implications do those provisions have for the industry at large?
- » How should Chief Compliance Officers and in-house counsel work with their boards and senior management teams when negotiating and implementing a CIA?
- » What are some realities of corporate life and operations under CIAs, and what do they mean?

5:30-6:30 pm

**Welcome Reception, sponsored by HealthCare Appraisers, Inc. and FTI Consulting**

(attendees, faculty, and registered guests are welcome)

6:30-9:00 pm

**Paint the Town with Friends, hosted by Women's Leadership Council**

(space is limited; additional fee; pre-registration required; see page 17)

Join us for a fun evening of painting. PaintNite ([www.paintnite.com](http://www.paintnite.com)) is coming directly to us at the hotel for a night of laughter, networking and creative fun. The cost is \$42 and includes all materials. To attend, you must pre-register (sorry no refunds). What to wear? Although aprons will be provided, you will be using water-based paints that can stain clothing, so keep this in mind when putting together your outfit or you might end up with a piece of tie-dye artwork as well.

## MONDAY, SEPTEMBER 28, 2015

7:00 am-4:45 pm

**Registration and Information**

7:00-8:00 am

**Continental Breakfast, sponsored by HealthCare Appraisers, Inc. and FTI Consulting**

(attendees, faculty, and registered guests are welcome)

### GENERAL SESSION

8:00-8:15 am

**Welcome and Introductions**

*Charlene L. McGinty, AHIA President-Elect*

*Robert G. Homchick, Program Chair*

8:15-8:45 am

**Keynote Address: An Update from the Department of Justice**

*Joyce Branda*

8:45-9:45 am

**Year in Review**

*Elizabeth B. Carder-Thompson*

It's been yet another banner year for fraud and abuse investigative and enforcement initiatives by the government, with an amazing roster of judgments and settlements. Highlights of this fast-paced review will cover:

- » This year's colorful crop of qui tam relators, including compliance officers, hospital CEOs, hospital HR directors
- » Recent rulings on nursing home "worthless services"
- » Assessing the government's authority to extrapolate claims to determine the scope of liability
- » Exploring the limits of the public disclosure bar—can a relator still pursue an FCA matter if there's been a RAC audit or other investigation?
- » Proposed new anti-kickback safe harbor and Stark self-referral regulations
- » Going after individuals in the corporate suite—DOJ pronouncements, false claim and kickback cases
- » The Tuomey appeal—how high will Stark settlements go?
- » Plus the session will cover notable highlights of the year in health reform, public health, and Medicaid and Medicare, and some items you may have missed

9:45-10:15 am

**Coffee Break, sponsored by HealthCare Appraisers, Inc. and FTI Consulting**

### CONCURRENT SESSIONS

10:15-11:15 am

**J. Legal Ethics: Practical Aspects to Preserving, Protecting or Waiving Attorney-Client Privilege** (not repeated)

*Jamie M. Bennett*

*Robert S. Salcido*

- » Establishing attorney-client privilege when conducting internal reviews: When to do it and when is it unnecessary
- » What qui tam relators or government lawyers do when they encounter privileged materials
- » Factors qui tam plaintiffs evaluate when deciding whether to challenge whether the privilege is properly asserted
- » Strategic and practical considerations involved in determining whether to waive the privilege during government investigations: It may be privileged but "should" you provide it to the government anyway and if you do have your fully waived the privilege

**K. Fair Market Value Primer: Basic Concepts and Current Trends** (not repeated)

*Albert D. Hutzler*

*Joseph N. Wolfe*

- » As "fair market value" has been increasingly required in so many health care transactions, it is has become critical for health lawyers and compliance officers to have a basic understanding of how valuations are performed to ensure compliance with the various health care regulations
- » Why "fair market value" matters—the overarching concept and the rationale behind it
- » The fair market value standard (including IRS Revenue Ruling 59-60 and related guidance)
- » Stark/Anti-kickback fair market value definition and related regulatory guidance



- » Basic valuation principles and approaches, including the cost, income, and market approaches, as well as basic valuator standards and requirements
- » Common recurring problems in health care valuation (including data issues and the distinction of “commercial reasonableness”)
- » Several basic examples of valuation situations, including process of data gathering, analysis, and documenting the appraisal
- » Methodologies and strategies for compensating physicians based on quality, performance, and value

## **L. Medicare and Medicaid Administrative Enforcement Strategies** (not repeated)

*Julie Burns*

*Judith A. Waltz*

- » CMS’ fraud prevention system and data analytics
- » CMS/OIG focus on “recalcitrant” providers/suppliers
- » Medicare: Loss of billing privileges, enrollment moratoria, and 2015 Regulations
- » Payment suspensions based on credible allegations of fraud
- » New initiatives in OIG Enforcement (CMPs and exclusions)
- » Medicaid: Reciprocal terminations, suspensions

## **M. Recent Stark and AKS Developments**

*S. Craig Holden*

*Kevin G. McAnaney*

- » Stark developments
  - Case law
    - *Tuomey*
    - *Citizens Medical Center*
    - *Nurses Registry*
  - Proposed regulations
  - Legislative developments
- » AKS Developments
  - Case Law
    - *Ameritox, LTD v. Millennium Laboratories, Inc.*
    - *Meridian Surgical Partners*
    - *Health Diagnostic Laboratory*
  - Recent OIG Advisory Opinions

## **N. Mergers and Acquisition in Health Care on the Rise—Legal and Compliance Considerations**

*Margaret J. Davino*

*Joel D. Dziengielewski*

- » Operational and legal considerations when contemplating a transaction and/or strategy affiliation
- » What options are available to structure deals and what are the pros and cons of each
- » Implementation and monitoring of a Compliance Program for the newly combined organizations, components, as it will be essential to reducing regulatory risks.
- » Awareness of, and familiarity with, the regulations an organization is subject to can and should be built into the day-to-day compliance activities of the newly formed organization

11:30 am–12:30 pm

## **O. Telehealth** (not repeated)

*Kristi Kung*

*Adam Romney*

## **P. Defending FCA Lawsuits Based on the “Swapping” Theory of Anti-Kickback Liability** (not repeated)

*Ben Berkowitz*

*Brian R. Stimson*

- » The OIG’s swapping analysis under the federal Anti-Kickback Statute (AKS)
- » The key federal decisions on liability under the federal False Claims Act (FCA) and AKS for alleged swapping arrangements
- » Key defenses to FCA and AKS liability premised on alleged swapping arrangements
- » Effective summary judgment and trial strategies in swapping cases

## **Q. Taught by Experts: What the Expert Testimony in Tuomey and Halifax Tells Us about Physician Transactions Today**

*William W. Horton*

*Timothy Smith*

- » Is there any there there? Deriving a systematic understanding of FMV and commercial reasonableness from the expert testimony ... or not
- » Do great minds think alike? Comparing the experts’ ideas with the conventional wisdom and published literature on FMV
- » Isn’t there a law about that? Measuring the experts’ concepts against specific provisions of the law
- » I was told there’d be no math: The role of lawyers in FMV and commercial reasonableness analyses

## **R. Overpayments and the 60-Day Rule: A Need for Speed**

*Robert L. Roth*

*Howard Young*

- » When repayment/disclosure is not voluntary—the 60-day report and repayment statute
- » Analysis of Final Rule implementing the 60-day statute for Medicare Parts C & D and update on Proposed Rule for Parts A and B
- » Analysis of the first judicial decision interpreting the 60-day statute: *Kane ex rel. United States et al. v. Healthfirst et al.*
- » To which agency should you report a repayment/disclosure, what do you report and how much to disclose
- » How far back do you go/how far back can the government go—interplay of reopening rules and other authorities
- » Repayment obligations to Medicare Advantage and Medicaid Managed Care plans

## S. False Claims Act Allegations Based on Medical Necessity

*Lynn M. Adam*

*Stephen B. Harris*

- » False Claims Act risk when the Government or a relator alleges that services were not medically necessary
- » DOJ's national investigation into implantable cardioverter defibrillators (ICDs)—a new model for medical-necessity investigations?
- » Responding to an FCA investigation involving complex clinical procedures; a hospital's perspective
- » Compliance tips for hospitals to prepare for the next medical-necessity investigation, including clinical risk areas to address now

12:30-1:45 pm

## Lunch on your own or attend the Fraud and Abuse Practice Group Luncheon, sponsored by PYA

(additional fee; limited attendance; pre-registration required—see page 17)

2:00-3:30 pm Extended Sessions

## T. The OIG's Priorities and Authorities—A Primer

(not repeated)

*James Cannatti*

*Michael Cohen*

*Susan E. Gillin*

*Christi Grimm*

- » What is OIG's mission?
- » What are OIG's top priorities?
- » What role does OIG play toward ensuring quality and safety?
- » What is OIG's role in fraud enforcement?
- » How does OIG set its priorities?
- » What resources does OIG provide to the health care industry to assist in compliance?

## U. Compliance Ignorance Is not Compliance Bliss

(not repeated)

*John E. Kelly*

*Danette Leigh Slevinski*

*Robert G. Trusiak*

- » False Claims Act risk from observation coding and billing
- » Reverse False Claims Act risk for skilled nursing facilities following a RAC/MAC denial of a three day inpatient stay
- » ICD-10: How to assess compliance and perform audits now that it is here
- » Solutions and best practices to remain in compliance

## V. Truth Telling: Cover-Up or Catch 22? Audits, Monitoring, Internal Investigations and Perceptions, with Reverse False Claims Act Implications

*J. Reginald Hill (Moderator)*

*Sara McLean*

*Mary E. Riordan*

*Lisa Snell Rivera*

- » Developments in the law and recent decisions impacting providers' self-monitoring

- » Internal auditing and monitoring—prevention cost vs. benefit analysis and credibility
- » HHS-OIG and DOJ analysis of health care provider implementation of compliance measures and claimed self-policing
- » Where Corporate Integrity Agreements are born: Government perspective on providers' disclosed track record for handling reimbursement issues and trends in CIAs
- » How provider decisions responding to a billing error may fuel a False Claims Act case: Government and provider/defense perspectives for avoiding reverse False Claims Act cases
- » Hypotheticals:
  - After review, a provider has made some findings. After the recent holding in U.S. ex rel. *Kane v. HealthFirst*, is there a ticking clock? Hypothetical regarding pre-government involvement following provider discovery of reimbursement issues.
  - Government involvement before internal review—hypothetical for best practices for provider's response
- » Takeaways for providers to prepare for catch 22 scenarios

## W. Trivial Pursuit: Stark Law Edition

*Tony R. Maida*

*Catherine A. Martin*

*Lisa Ohrin Wilson*

- » May a hospital provide free on-site CME to physicians on its medical staff and not run afoul of the Stark Law? If a specialty physician practice sends a gift basket to the new primary care practice in town, how much nonmonetary compensation should be allocated to the physician(s) in the new practice? How should a rural health clinic determine the geographic area it serves when it has no inpatients? Does the recovery by a DHS entity of previously unpaid rental charges "cure" any noncompliance? And, most importantly, WHY? This intermediate-to-advanced session is intended to address some of the intricacies of the Stark Law and assist participants in understanding the sometimes unexpected results of applying the law's myriad exceptions. In addition, the panelists will discuss the clarifications and proposals to amend the regulations that were published in the July 15, 2015 Calendar Year 2016 Medicare Physician Fee Schedule proposed rule, including the effective dates of each provision. Specific topics to be covered include:
  - » What is (and is not) remuneration
  - » The intricacies of nonmonetary compensation
  - » Oddities of the law's exceptions for recruitment and retention
  - » The challenges with office space: Item, service, or none-of-the above, and other compliance issues
  - » Miscellaneous trivia and errata
  - » Physician Fee Schedule clarifications and proposals: current and future application

**C. Moving to Outcome-Oriented Care: Regulatory and Enforcement Challenges** (repeat)

3:45-4:45 pm

**X. OIG's Use of Administrative Remedies in Health Care Fraud Cases** (not repeated)

*Robert K. DeConti*

*Lisa Re*

**Y. Compliance in Behavioral Health** (not repeated)

*James M. Caponi*

*Mark L. Mattioli*

- » Relationship of state law to behavioral health providers, including regulations that impact billing for services
- » Unique aspects of medical necessity regarding behavioral health
- » Strategies for defending behavioral health providers in payment disputes
- » Role of physician extenders in mental health
- » Unique privacy issues regarding behavioral health providers

**Z. Health Care Lawyers Beware: Legal Ethics and Managing the Risks of Corporate Representation**

*Kim Harvey Looney*

*Mark Thompson*

- » Who is your client?
- » Indictment of lawyers: *U.S. v. Anderson*
- » Assertion of attorney-client privilege—how effective is it?
- » Be careful what you sign: *U.S. v. Sulzbach*
- » What did you know and when did you know it?
- » Advice of counsel defense: *U.S. ex rel. Drakeford v. Tuomey*
- » Obstruction of justice: *U.S. v. Lauren Stevens*
- » Potential personal liability for lawyers
- » Lessons learned

**Q. Taught by Experts: What the Expert Testimony in Tuomey and Halifax Tells Us about Physician Transactions Today** (repeat)

3:45-5:15 pm Extended Session

**AA. Managed Care: Fraud and Abuse's New Frontier**

*Keith Dobbins*

*Amy Gandhi*

*Laura F. Laemmle-Weidenfeld*

- » MCOs'/MAOs' responsibilities for preventing fraud, waste and abuse
- » Processes for identifying and investigating provider fraud, waste, and abuse
- » Suspension of payments
- » Provider risk areas, including potential FCA liability
- » Provider self-identification, reporting, and returning overpayments to MCOs

4:45-6:00 pm

**Networking Reception, sponsored by HealthCare Appraisers, Inc. and FTI Consulting**

(attendees, faculty, and registered guests are welcome)

6:00-7:00 pm

**Mix it Up and Celebrate Diversity+Inclusion**

**Reception, sponsored by AHLA's Diversity+Inclusion Council**

(attendees and faculty are welcome; please RSVP on the registration form)

Back by popular demand: create your own trail mix and enjoy a selection of refreshing fruit smoothies at the Celebrate Diversity+Inclusion reception. Learn more about AHLA's diversity and inclusion initiatives. Network with AHLA leaders and your fellow colleagues.

## TUESDAY, SEPTEMBER 29, 2015

7:00 am-3:30 pm

**Registration and Information**

7:00-8:00 am

**Continental Breakfast, sponsored by HealthCare Appraisers, Inc. and FTI Consulting**

(attendees, faculty, and registered guests are welcome)

7:00-7:50 am

**Women's Networking Breakfast, sponsored by Women's Leadership Council**

(attendees and faculty are welcome; pre-registration is required—see p. 17; space is limited)

8:00-9:30 am Extended Sessions

**BB. False Claims Act Update** (not repeated)

*Michael D. Granston*

*Katherine A. Lauer*

*Paul S. Weidenfeld*

The panel will discuss recent developments in FCA law, with a focus on issues that are particularly relevant in healthcare matters. Topics include:

- » Statistical sampling and extrapolation
- » Implied certification/conditions of payment vs. conditions of participation
- » Reverse false claims/overpayments
- » The increasing role of mediation

**E. Legal and Compliance: Roles and Responsibilities** (repeat)

**V. Truth Telling: Cover-Up or Catch 22? Audits, Monitoring, Internal Investigations and Perceptions, with Reverse False Claims Act Implications** (repeat)

**W. Trivial Pursuit: Stark Law Edition** (repeat)

**AA. Managed Care: Fraud and Abuse's New Frontier** (repeat)

9:45-10:45 am

## **CC. I Went down to the Crossroads: How to Avoid “Singing the Blues” at the Intersection of Labor and Employment Law and the False Claims Act**

(not repeated)

*Marilyn May*

*Robert R. Niccolini*

- » How seemingly minor employment matters can grow into qui tam cases
- » The internal investigation issues, including confidentiality, attorney-client privilege, and labor law implications
- » Best practices for employment and whistleblower investigations and personnel action, including severance agreements
- » HIPAA subpoenas, civil investigation demands, Grand Jury subpoenas and other False Claim Act precursors
- » Resolving the tensions between employment and False Claims Act concerns

## **DD. Hot Topics in Laboratory Compliance** (not repeated)

*Karen Stephanie Lovitch*

*Robert J. Rossi*

- » The health care fraud enforcement climate for laboratories
- » Relevant state and federal fraud and abuse laws
- » Legal risks presented by interactions with health care professionals and other sales and marketing activities
- » Legal and business risks related to interactions with patients, including collection of outstanding invoices

## **EE. Advanced Compensation Techniques for Fostering Entrepreneurship in Hospital-Owned Medical Practices**

*Peter A. Pavarini*

*Chad Stutelberg*

- » Regulatory restraints on physician compensation are often blamed for diminishing entrepreneurship in medical practices owned by or affiliated with hospitals and health systems
- » As providers adapt to new third party payment arrangements, especially those based upon patient outcomes and risk-sharing, creative compensation models are being used to incentivize physician performance in a compliant manner
- » How to design multi-faceted physician compensation models that are consistent with law, valuation principles and the population health objectives
- » Case studies; representative compensation models for different specialties and settings; sample data to support favorable legal opinions

## **FF. Wayward Whistleblowers**

*Stephanie Griffin*

*Stephen G. Sozio*

- » The role of counsel, inside and outside, and compliance personnel, in dealing with known or suspected whistleblowers, who are using particularly aggressive tactics

- » Responses and strategy for dealing with such tactics
- » The government's view on such tactics and its use of such information

## **GG. Recognizing and Addressing EHR-Related Compliance Challenges: Annotations to the Guide for Safe Selection and Use**

*Timothy P. Blanchard*

*Michael Tribble*

- » An EHR is a power tool. If well-designed and used properly, it can improve quality of care, compliance and revenue cycle performance. If poorly-designed or used by inadequately trained or inattentive personnel, someone is going to get hurt. We will provide the annotations that should be understood when selecting, programming and using an EHR in practice.
- » Automation and interface fatigue issues
- » Dysfunctional functionalities: Menus, pre-population, copy and paste, templates
- » Authentication and access control issues
- » Computerized support for clinical decision-making and coding

11:00 am-12:00 noon

## **HH. Staying Compliant amidst the Battle over the 340B Program's Future** (not repeated)

*Jolee H. Bollinger*

*William H. von Oehsen*

The 340B program is in a state of flux and under political scrutiny. Within the last two years alone, the program has been subject to litigation, critiqued by the OIG and GAO, debated at a Congressional hearing, addressed in draft legislation and clarified through informal guidance and pending regulations. Against this backdrop, understanding and meeting program requirements is a challenge. This presentation will:

- » Provide a 340B program overview
- » Identify recent developments in 340B program guidance
- » Describe the essential elements of operating a compliant 340B program

## **JJ. Home Health and Hospice: Eligibility and Enforcement** (not repeated)

*Kathleen A. Hessler*

*Wade P. Miller*

- » Key elements of the Medicare Hospice and Home Health Benefits and eligibility diagnoses, medical necessity and homebound status
- » Recent enforcement activity involving home health and hospice
- » Emerging False Claims Act case law affecting hospice eligibility
- » Internal and external monitoring and auditing activities
- » Practical advice for attorneys and clients



**KK. Manage Security Risks Now to Avoid a Hack(neyed),  
Post Data Breach Response**

*Patricia A. Markus  
Ken Miller*

- » Analysis and implications of recent breaches and OCR resolution agreements
- » The current status and focus areas of OCR's Permanent Audit Program
- » Strategies for reducing legal risk by focusing now on high-priority information security areas, including:
  - Risk assessment and management
  - Device and media controls
  - Transmission
  - Training

**M. Recent Stark and AKS Developments (repeat)**

**S. False Claims Allegations Based on Medical Necessity (repeat)**

12:00 noon-1:15 pm

**Lunch on your own**

1:15-2:15 pm

**N. Mergers and Acquisitions in Health Care on the Rise—Legal and Compliance Considerations (repeat)**

**R. Disclosures, Overpayments, 60-Day Rule (repeat)**

**Z. Health Care Lawyers Beware: Legal Ethics and Managing the Risks of Corporate Representation (repeat)**

**EE. Advanced Compensation Techniques for Fostering Entrepreneurship in Hospital-Owned Medical Practices (repeat)**

2:30-3:30 pm

**H. Corporate Integrity Agreements: Lessons Learned from Implementation, for Companies with and without a CIA (repeat)**

**FF. Wayward Whistleblowers (repeat)**

**GG. Recognizing and Addressing EHR-Related Compliance Challenges: Annotations to the Guide for Safe Selection and Use (repeat)**

**KK. Manage Security Risks Now to Avoid a Hack(neyed),  
Post Data Breach Response (repeat)**

**Adjournment**

## Planning Committee

### **Robert G. Homchick**, *Program Chair*

Davis Wright Tremaine LLP  
Seattle, WA

### **Joan P. Dailey**

Office of the General Counsel  
US Department of Health and Human Services  
Washington, DC

### **J. Reginald Hill**

Chief Compliance Officer  
LifePoint Hospitals Inc  
Brentwood, TN

### **John E. Kelly, Jr.**

Bass Berry & Sims PLC  
Washington, DC

### **Katherine A. Lauer**

Latham & Watkins LLP  
San Diego, CA

### **Albert W. Shay**

Morgan Lewis & Bockius LLP  
Washington, DC

---

### **Lynn M. Adam**

King & Spalding LLP  
Atlanta, GA

### **Katie Arnholt**

Deputy Branch Chief, ACRB  
Office of the Inspector General  
US Department of Health and Human Services  
Washington, DC

### **Marti Arvin**

Chief Compliance Officer  
UCLA Health System and David Geffen School of  
Medicine  
Los Angeles, CA

### **Jenny Barnes**

Ohio State University Medical Center  
Columbus, OH

### **Kevin R. Barry**

Deputy Chief  
Administrative and Civil Remedies Branch  
Office of Counsel to the Inspector General  
US Department of Health and Human Services  
Washington, DC

### **Troy A. Barsky**

Crowell & Moring LLP  
Washington, DC

### **Jamie M. Bennett**

Ashcraft & Gerel LLP  
Landover, MD

### **Ben Berkowitz**

Keker & Van Nest LLP  
San Francisco, CA

### **Timothy P. Blanchard**

Blanchard Manning LLP  
Eastsound, WA

### **Jolee H. Bollinger**

General Counsel  
Franciscan Missionaries of Our Lady Health System  
Baton Rouge, LA

### **Joyce R. Branda**

Deputy Assistant Attorney General  
Office of Assistant Attorney General  
Civil Division  
Department of Justice  
Washington, DC

### **Julie Burns**

Office of the General Counsel  
US Department of Health and Human Services, CMS  
Division  
Baltimore, MD

### **James Cannatti**

Senior Counselor for Health Information Technology  
Office of the Inspector General  
US Department of Health and Human Services  
Washington, DC

### **Elizabeth B. Carder-Thompson**

Reed Smith LLP  
Washington, DC

### **James M. Caponi**

Vice-President, Chief Compliance and Privacy Officer  
UHS of Delaware, Inc.  
King of Prussia, PA

### **Julie E. Chicoine**

Senior Assistant General Counsel  
Ohio State University  
Waxner Medical Center  
Columbus, OH

### **Michael Cohen**

Operations Officer, Office of Investigations  
Office of the Inspector General  
US Department of Health and Human Services  
Washington, DC

### **Edward Crooke**

Department of Justice  
Washington, DC

### **Anthea Daniels**

Baker Donelson Bearman Caldwell & Berkowitz PC  
Cleveland, OH

### **Margaret J. Davino**

Kaufman Borgeest & Ryan LLP  
New York, NY

### **Robert K. DeConti**

Assistant Inspector General for Legal Affairs  
Office of the Inspector General  
US Department of Health and Human Services  
Washington, DC

## **Keith Dobbins**

Deputy General Counsel  
UnitedHealthcare Medicare & Retirement  
Minnetonka, MN

## **Joel D. Dziengielewski**

Director  
Navigant Consulting, Inc.  
New York, NY

## **Amy Gandhi**

Senior Director of Compliance and Risk Management  
Inova Health Plans & Population Health  
Falls Church, VA

## **Susan E. Gillin**

Deputy Branch Chief, Administrative and Civil  
Remedies Branch  
Office of the Inspector General  
US Department of Health and Human Services  
Washington, DC

## **Michael D. Granston**

Director, Civil Fraud Section  
Commercial Litigation Branch, US Department of  
Justice  
Washington, DC

## **David S. Greenberg**

Arent Fox LLP  
Washington, DC

## **Adam H. Greene**

Davis Wright Tremaine LLP  
Washington, DC

## **Stephanie Griffin**

Chief Compliance Officer and Compliance Counsel  
Communicare  
Cincinnati, OH

## **Christi Grimm**

Chief of Staff, Immediate Office  
Office of Inspector General  
US Department of Health and Human Services  
Washington, DC

## **Stephen B. Harris**

Director of Reimbursement  
Tampa General Hospital  
Tampa, FL

## **Kathleen A. Hessler**

Director, Compliance and Risk  
Simione Healthcare Consultants  
Albuquerque, NM

## **S. Craig Holden**

Ober | Kaler  
Baltimore, MD

## **William W. Horton**

Jones Walker LLP  
Birmingham, AL

## **Albert D. Hutzler**

HealthCare Appraisers Inc  
Delray Beach, FL

## **Kristi V. Kung**

Pillsbury Winthrop Shaw Pittman LLP  
Washington, DC

## **Laura F. Laemmle-Weidenfeld**

Jones Day  
Washington, DC

## **Michael B. Lampert**

Ropes & Gray LLP  
Boston, MA

## **Kim Harvey Looney**

Waller Lansden Dortch & Davis LLP  
Nashville, TN

## **Karen Stephanie Lovitch**

Mintz Levin Cohn Ferris Glovsky & Popeo PC  
Washington, DC

## **Tony R. Maida**

McDermott Will & Emery LLP  
New York, NY

## **Patricia A. Markus**

Smith Moore Leatherwood LLP  
Raleigh, NC

## **Catherine A. Martin**

Ober | Kaler  
Baltimore, MD

## **Mark L. Mattioli**

Marshall Dennehey Warner Coleman & Goggin PC  
Philadelphia, PA

## **David E. Matyas**

Epstein Becker & Green PC  
Washington, DC

## **Marilyn May**

Arnold & Porter LLP  
Washington, DC

## **Kevin G. McAnaney**

Law Offices of Kevin McAnaney  
New York, NY

## **Sara McLean**

Assistant Director, Commercial Litigation Branch  
(Fraud Section), Civil Division  
United States Department of Justice  
Washington, DC

## **Ken Miller**

HORNE LLP  
Ridgeland, MS

## **Wade P. Miller**

Alston & Bird LLP  
Atlanta, GA

## **Robert R. Niccolini**

Ogletree Deakins  
Washington, DC

## **Thomas F. O'Neill**

The Saranac Group  
Baltimore, MD

**Michael E. Paulhus**

King & Spalding LLP  
Atlanta, GA

**Peter A. Pavarini**

Squire Patton Boggs  
Columbus, OH

**Wes Porter**

Senior Vice President, Chief Compliance Officer  
Wright Medical Technology, Inc.  
Memphis, TN

**Lisa Re**

Office of Counsel to the Inspector General  
Office of the Inspector General  
US Department of Health and Human Services  
Washington, DC

**Mary E. Riordan**

Office of Counsel to the Inspector General  
Office of the Inspector General  
US Department of Health and Human Services  
Washington, DC

**Lisa Snell Rivera**

Bass Berry & Sims PLC  
Nashville, TN

**Adam D. Romney**

Davis Wright Tremaine LLP  
Seattle, WA

**Robert J. Rossi**

Senior Vice President & Chief Compliance Officer  
Calloway Laboratories  
Woburn, MA

**Robert L. Roth**

Hooper Lundy & Bookman PC  
Washington, DC

**Christopher C. Sabis**

Assistant United States Attorney  
United States Attorney's Office for the Middle District  
of Tennessee  
Nashville, TN

**Robert S. Salcido**

Akin Gump Strauss Hauer & Feld LLP  
Washington, DC

**Danette Leigh Slevinski**

SVP, Chief Corporate Compliance Officer & HIPAA  
Privacy Officer  
NYU Lutheran  
Brooklyn, NY

**Timothy Smith**

Senior Managing Director  
Ankura Consulting Group LLC  
Dallas, TX

**Stephen G. Sozio**

Jones Day  
Cleveland, OH

**Brian R. Stimson**

Alston & Bird LLP  
Atlanta, GA

**Chad Stutelberg**

Executive Vice President and Practice Leader—  
Physician Services  
Integrated Healthcare Strategies  
Minneapolis, MN

**Mark Thompson**

Siegreid Bingham  
Kansas City, MO

**Michael Tribble**

Associate General Counsel  
CUMG/ NWH/ UWNC/ UW Physicians  
Seattle, WA

**Robert G. Trusiak**

Principal  
Health Care Compliance Support  
Buffalo, NY

**William H. von Oehsen**

Powers Pyles Sutter & Verville PC  
Washington, DC

**Judith A. Waltz**

Foley & Lardner LLP  
San Francisco, CA

**Paul S. Weidenfeld**

Law Offices of Paul Weidenfeld PLLC  
Washington, DC

**Lisa Ohrin Wilson**

Senior Technical Advisor  
Centers for Medicare and Medicaid Services  
Windsor Mill, MD

**Joseph N. Wolfe**

Hall Render Killian Heath & Lyman PC  
Milwaukee, WI

**Nolan S. Young**

Assistant General Counsel  
DaVita Healthcare Partners  
Denver, CO

**Howard Young**

Morgan Lewis & Bockius LLP  
Washington, DC

# Fraud and Compliance Forum Program At A Glance

## SUNDAY, SEPTEMBER 27, 2015

12:30 pm-5:30 pm	Registration and Information		
1:00-2:30 pm  Extended Session	<b>A. Stark Law Primer</b> (not repeated)  <i>Barsky Dailey</i>	<b>B. Compliance Primer: How Do You Know if Your Compliance Program is Effective?</b> (not repeated)  <i>Arnholt Arvin</i>	<b>C. Moving to Outcome-Oriented Care: Regulatory and Enforcement Challenges</b>  <i>Greenberg Sabis Young</i>
2:45-4:15 pm  Extended Session	<b>D. False Claims Act Primer</b> (not repeated)  <i>Crooke Paulhus</i>		<b>E. Legal and Compliance: Roles and Responsibilities</b>  <i>Barnes Chicoine Daniels</i>
4:30-5:30 pm	<b>F. Anti-Kickback Primer</b> (not repeated)  <i>Barry Matyas</i>	<b>G. HIPAA Compliance Primer</b> (not repeated)  <i>Greene</i>	<b>H. Corporate Integrity Agreements: Lessons Learned from Implementation, for companies with and without a CIA</b>  <i>Lampert O'Neill Porter</i>
5:30-6:30 pm	<b>Welcome Reception, sponsored by HealthCare Appraisers, Inc. and FTI Consulting</b> (attendees, faculty, and registered guest are welcome)		
6:30-9:00 pm	<b>Paint the Town with Friends, hosted by Women's Leadership Council</b> (attendees, faculty, and registered guest are welcome; space is limited; pre-registration required; additional fee; see page 17)		

## MONDAY, SEPTEMBER 28, 2015

7:00 am-4:45 pm	Registration and Information				
7:00-8:00 am	<b>Continental Breakfast, sponsored by HealthCare Appraisers, Inc. and FTI Consulting</b> (attendees, faculty, and registered guests are welcome)				
8:00-9:45 am	<b>GENERAL SESSION</b> 8:00-8:15 am <b>Welcome and Introductions</b> <i>McGinty, Homchick</i>  8:15-8:45 am <b>Keynote Address: An Update for the Department of Justice</b> <i>Branda</i>  8:45-9:45 am <b>Year in Review</b> <i>Carder-Thompson</i>				
9:45-10:15 am	<b>Coffee Break, sponsored by HealthCare Appraisers, Inc. and FTI Consulting</b>				
10:15-11:15 am	<b>J. Legal Ethics: Practical Aspects to Preserving, Protecting or Waiving Attorney-Client Privilege</b> (not repeated)  <i>Bennett Salcido</i>	<b>K. Fair Market Value Primer: Basic Concepts and Current Trends</b> (not repeated)  <i>Hutzler Wolfe</i>	<b>L. Medicare and Medicaid Administrative Enforcement Strategies</b> (not repeated)  <i>Burns Waltz</i>	<b>M. Recent Stark and AKS Developments</b>  <i>Holden McAnaney</i>	<b>N. Mergers and Acquisitions in Health Care on the Rise—Legal and Compliance Considerations</b>  <i>Davino Dziengielewski</i>



# Fraud and Compliance Forum Program At A Glance

## MONDAY, SEPTEMBER 28, 2015, CONTINUED

11:30 am-12:30 pm	<b>O. Telehealth</b> (not repeated)  <i>Kung Romney</i>	<b>P. Defending FCA Lawsuits Based on the “Swapping” Theory of Anti-Kickback Liability</b> (not repeated)  <i>Berkowitz Stimson</i>	<b>Q. Taught by Experts: What the Expert Testimony in Tuomey and Halifax Tells Us about Physician Transactions Today</b>  <i>Horton Smith</i>	<b>R. Overpayments and the 60-Day Rule: A Need for Speed</b>  <i>Roth Young</i>	<b>S. False Claims Allegations Based on Medical Necessity</b>  <i>Adam Harris</i>
12:30-1:45 pm	<b>Lunch on your own or attend the Fraud and Abuse Practice Group Luncheon, sponsored by PYA</b> (additional fee; limited attendance; pre-registration required)				
2:00-3:30 pm  Extended Sessions	<b>T. The OIG’s Priorities and Authorities—A Primer</b> (not repeated)  <i>Cannatti Cohen Gillin Grimm</i>	<b>U. Compliance Ignorance Is not Compliance Bliss</b> (not repeated)  <i>Kelly Slevinski Trusiak</i>	<b>V. Truth Telling: Cover-Up or Catch 22? Audits, Monitoring, Internal Investigations</b>  <i>Hill (Moderator) McLean Riordan Rivera</i>	<b>W. Trivial Pursuit: Stark Law Edition</b>  <i>Maida Martin Wilson</i>	<b>C. Moving to Outcome-Oriented Care: Regulatory and Enforcement Challenges</b> (repeat)  <i>Greenberg Sabis Young</i>
3:45-4:45 pm	<b>X. OIG’s Use of Administrative Remedies in Health Care Fraud Cases</b> (not repeated)  <i>DeConti Re</i>	<b>Y. Compliance in Behavioral Health</b> (not repeated)  <i>Caponi Mattioli</i>	<b>Z. Ethical and Legal Challenges for Health Lawyers</b>  <i>Looney Thompson</i>	<b>Q. Taught by Experts: What the Expert Testimony in Tuomey and Halifax Tells Us about Physician Transactions Today</b> (repeat)  <i>Horton Smith</i>	3:45-5:15 pm  Extended Session  <b>AA. Managed Care: Fraud and Abuse’s New Frontier</b>  <i>Dobbins Gandhi Laemmle-Weidenfeld</i>
4:45-6:00 pm	<b>Networking Reception, sponsored by HealthCare Appraisers, Inc. and FTI Consulting</b> (attendees, faculty, and registered guests are welcome)				
6:00-7:00 pm	<b>Mix it up and Celebrate Diversity+Inclusion Reception, sponsored by AHLA’s Diversity+Inclusion Council</b> (attendees and faculty are welcome)				

## TUESDAY, SEPTEMBER 29, 2015

7:00 am-3:30 pm	<b>Registration and Information</b>				
7:00-8:00 am	<b>Continental Breakfast, sponsored by HealthCare Appraisers, Inc. and FTI Consulting</b> (attendees, faculty, and registered guests are welcome)  <b>7:00-7:50 am</b> <b>Women’s Networking Breakfast, sponsored by AHLA’s Women’s Leadership Council</b> (attendees and faculty are welcome; pre-registration is required)				
8:00-9:30 am  Extended Sessions	<b>BB. False Claims Act Update</b> (not repeated)  <i>Granston Lauer Weidenfeld</i>	<b>E. Legal and Compliance: Roles and Responsibilities</b> (repeat)  <i>Barnes Chicoine Daniels</i>	<b>V. Truth Telling: Cover-Up or Catch 22? Audits, Monitoring, Internal Investigations</b> (repeat)  <i>Hill (Moderator) McLean Riordan Rivera</i>	<b>W. Trivial Pursuit: Stark Law Edition</b> (repeat)  <i>Maida Martin Wilson</i>	<b>AA. Managed Care: Fraud and Abuse’s New Frontier</b> (repeat)  <i>Dobbins Gandhi Laemmle-Weidenfeld</i>

## TUESDAY, SEPTEMBER 29, 2015, CONTINUED

9:45-10:45 am	<b>CC. I Went down to the Crossroads: How to Avoid “Singing the Blues” at the Intersection of Labor and Employment Law and the False Claims Act</b> (not repeated)  <i>May Nicolini</i>	<b>DD. Hot Topics in Laboratory Compliance</b> (not repeated)  <i>Lovitch Rossi</i>	<b>EE. Advanced Compensation Techniques for Fostering Entrepreneurship in Hospital-Owned Medical Practices</b>  <i>Pavarini Stutelberg</i>	<b>FF. Wayward Whistleblowers</b>  <i>Griffin Sozio</i>	<b>GG. Recognizing and Addressing EHR-Related Compliance Challenges: Annotations to the Guide for Safe Selection and Use</b>  <i>Blanchard Tribble</i>
11:00 am-12:00 noon	<b>HH. Staying Compliant amidst the Battle over the 340B Program’s Future</b> (not repeated)  <i>Bollinger von Oehsen</i>	<b>JJ. Home Health and Hospice: Eligibility and Enforcement</b> (not repeated)  <i>Hessler W. Miller</i>	<b>KK. Manage Security Risks Now to Avoid a Hack(neyed), Post Data Breach Response</b>  <i>Markus K. Miller</i>	<b>M. Recent Stark and AKS Developments</b> (repeat)  <i>Holden McAnaney</i>	<b>S. False Claims Act Allegations Based on Medical Necessity</b> (repeat)  <i>Adam Harris</i>
12:00 noon-1:15 pm	<b>Lunch on your own</b>				
1:15-2:15 pm	<b>N. Mergers and Acquisitions in Health Care on the Rise—Legal and Compliance Considerations</b> (repeat)  <i>Davino Dziengielewski</i>	<b>R. Overpayments and the 60-Day Rule: A Need for Speed</b> (repeat)  <i>Roth Young</i>	<b>Z. Ethical and Legal Challenges for Health Lawyers</b> (repeat)  <i>Looney Thompson</i>	<b>EE. Advanced Compensation Techniques for Fostering Entrepreneurship in Hospital-Owned Medical Practices</b> (repeat)  <i>Pavarini Stutelberg</i>	
2:30-3:30 pm	<b>H. Corporate Integrity Agreements: Lessons Learned from Implementation, for companies with and without a CIA</b> (repeat)  <i>Lampert O'Neill Porter</i>	<b>FF. Wayward Whistleblowers</b> (repeat)  <i>Griffin Sozio</i>	<b>GG. Recognizing and Addressing EHR-Related Compliance Challenges: Annotations to the Guide for Safe Selection and Use</b> (repeat)  <i>Blanchard Tribble</i>	<b>KK. Manage Security Risks Now to Avoid a Hack(neyed), Post Data Breach Response</b> (repeat)  <i>Markus K. Miller</i>	

## Program Information

**Dates:** September 27-29, 2015

**Place:** Hilton Baltimore Hotel  
401 W. Pratt Street  
Baltimore, MD 21202

**Phone:** (443) 573-8700

**Fax:** (443) 683-8841

### Registration Fees:

#### Postmarked and paid on or before September 8, 2015

\$815 For the first AHLA Member

\$715 For the first AHLA In-House Counsel/  
Compliance Officers Members

\$740 For each additional AHLA Member

\$640 For each additional AHLA In-House Counsel/  
Compliance Officer Member

\$865 In-House Counsel/Compliance Officer Non-Members

\$1040 Non-Members

#### Postmarked and paid after September 8, 2015

\$940 For the first AHLA Member

\$715 For the first AHLA In-House Counsel/  
Compliance Officers Members

\$740 For each additional AHLA Member

\$840 For each additional AHLA In-House Counsel/  
Compliance Officer Member

\$990 In-House Counsel/Compliance Officer Non-Members

\$1165 Non-Members

### Printed Course Materials: \$55

If you have indicated an incorrect amount due to errors in addition or not being eligible for a specific rate, AHLA will charge the correct amount to the credit card you have supplied.

**Discounted Registration Fees:** Government employees, academicians, solo practitioners and students: please call (202) 833-1100, prompt #2 for special discounted registration fees.

**Spouse/Guest Fee:** For an additional \$30 spouses and adult guests can register to attend the reception on Sunday and Monday evenings and the breakfasts on Monday and Tuesday mornings. Please sign up on the registration form. (Children are welcome to attend these events at no additional charge.)

**Continuing Education:** Participants will be given continuing education request forms at the program. Forms must be completed and returned to AHLA staff to receive credit. AHLA is an approved sponsor of continuing legal education credits in most states. This seminar will be worth approximately 15.5 continuing education credits (including 2.0 ethics credit) based on a 60-minute hour and 18.6 credits (including 2.4 ethics credits) based on a 50-minute hour.

AHLA is registered with the National Association of State Boards of Accountancy (NASBA) as a sponsor of continuing professional education on the National Registry of CPE Sponsors. State boards of accountancy have final authority on the acceptance of individual courses for CPE credit. Complaints regarding registered sponsors may be addressed to the National Registry of CPE Sponsors, 150 Fourth Avenue North, Suite 700, Nashville, TN 37219-2417. Website: [www.nasba.org](http://www.nasba.org). This seminar will be worth approximately 18.0 CPE credits.

AHLA has applied for 18.6 Compliance Certification Board (CCB) Credits. The number of credits will be posted once the application is approved.

This program is designed to be an update on developments in the area of fraud and abuse and compliance. There are no prerequisites or advanced preparations required to register for this group live program. Those seeking accounting credits should be familiar with the basic concepts of law and terminology associated with the topic area in order to obtain the full educational benefit of this program.

**Hotel Reservations:** Hotel accommodations are not included in the registration fee. Call The Hilton Baltimore Hotel at (443) 573-8700. If calling, please indicate that you are attending the AHLA program. Rooms at the group rate of \$212 single/double occupancy are limited and may sell out prior to the September 8 cut-off.

**Membership:** Dues are \$220 for those admitted to the Bar/graduated from college within the last four years; \$330 for those admitted/graduated between four and seven years ago; and \$375 for those admitted/graduated eight or more years ago. Dues are \$105 for government employees and full-time academicians; \$99 for paralegals, \$110 for public interest professionals, and \$85 for retired professionals. Include the applicable membership fee with your registration form and take advantage of the program registration fee for members.

**Cancellations/Substitutions:** Cancellations must be received in writing no later than September 18, 2015. Refunds will not be issued for cancellations received after this date. Registration fees, less a \$125 administrative fee, will be refunded approximately 3-4 weeks following the program. If you wish to send a substitute or need more information regarding refund, complaint and program cancellation policies, please call (202) 833-1100, prompt #5. Please note that registration fees are based on the AHLA membership status of the individual who actually attends the program.

**Special Needs:** If you have needs requiring special assistance or accommodations, including special dietary needs, or have questions about accessibility issues at the program, contact our special needs coordinator, Valerie Eshleman at (202) 833-0784 or [veshleman@healthlawyers.org](mailto:veshleman@healthlawyers.org).

**Travel:** Association Travel Concepts (ATC) has negotiated discounts with United, Delta, Hertz, and Enterprise Rental Car to bring you special airfares and car rental rates lower than those available to the public. Discounts apply for travel for AHLA 2015 meetings, discounts available 3 days pre/post meeting start/end dates. Restrictions and a service fee may apply. ATC will also search for the lowest available fare on any airline.

### ASSOCIATION TRAVEL CONCEPTS

1-800-458-9383

email: [reservations@atcmeetings.com](mailto:reservations@atcmeetings.com)

<http://www.atcmeetings.com/ahla>

ATC is available for reservations from 8:30 am until 8:00 pm Eastern, Monday through Friday.

# Fraud and Compliance Forum Registration Form

3

**To register:** Remit payment and completed registration form by mail to the American Health Lawyers Association • P.O. Box 79340 • Baltimore, MD 21279-0340 or fax with credit card information to (202) 775-2482. To register by phone call (202) 833-1100, prompt #2. If any program is over-subscribed, only AHLA members will be placed on a waiting list. On-site registrations will be accepted on a space-available basis only.

Name: \_\_\_\_\_ AHLA ID #: \_\_\_\_\_

First Name for Badge (if different than above): \_\_\_\_\_

Title: \_\_\_\_\_

Organization: \_\_\_\_\_

Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ ZIP+ 4: \_\_\_\_\_

Telephone: (\_\_\_\_\_) \_\_\_\_\_ Fax: (\_\_\_\_\_) \_\_\_\_\_

E-Mail: \_\_\_\_\_

Spouse/Guest Name \_\_\_\_\_

## Early Registration Fees (faxed/postmarked and paid on or before September 8, 2015):

**AHLA Members:** ☐ \$815

**Non-Members:** ☐ \$1040

**Multi-Member Discount:** ☐ \$740 each additional AHLA member registering from same organization at same time on the same check or credit card payment

**In-House Counsel/Compliance Officer:** ☐ \$715 AHLA Members ☐ \$865 Non-Members

**Multi-Member In-House Counsel/Compliance Officer:** ☐ \$640 each additional AHLA member registering from same organization at same time on the same check or credit card payment

## Registration Fees (faxed/postmarked and paid after September 9, 2015):

**AHLA Members:** ☐ \$940

**Non-Members:** ☐ \$1165

**Multi-Member Discount:** ☐ \$865 each additional AHLA member registering from same organization at same time on the same check or credit card payment

**In-House Counsel/Compliance Officer:** ☐ \$840 AHLA Members ☐ \$990 Non-Members

**Multi-Member In-House Counsel/Compliance Officer:** ☐ \$765 each additional AHLA member registering from same organization at same time on the same check or credit card payment

**I will require:** ☐ audio ☐ visual ☐ mobility ☐ other assistance \_\_\_\_\_

☐ I have special dietary needs \_\_\_\_\_

## I plan to attend:

☐ Mix it Up and Celebrate Diversity+Inclusion Reception, Monday, September 28, 6:00-7:00 pm

☐ Women's Networking Breakfast, Tuesday, September 29, 7:00-7:50 am

## PAYMENT INFORMATION

**Please fill in applicable amount:** (Sorry! Registrations cannot be processed unless accompanied by payment.)

\$ \_\_\_\_\_ Registration Fee

\$ \_\_\_\_\_ Fraud and Abuse Practice Group Luncheon (\$45 for members of the Fraud PG/\$50 for non-members of the Fraud PG; Monday, September 28, 2015)

\$ \_\_\_\_\_ Printed Course Materials (\$55) (All attendees will receive an electronic version of the materials. Attendees may purchase the hardcopy binder for an additional fee.)

\$ \_\_\_\_\_ Paint the Town with Friends (\$42, Sunday, September 27, 6:30-9:00 pm)

\$ \_\_\_\_\_ Spouse/Guest Fee (\$30)

\$ \_\_\_\_\_ Total Enclosed

☐ Check enclosed (Make checks payable to American Health Lawyers Association)

Bill my credit card: ☐  ☐  ☐  ☐  ☐ Diners Club

Number: \_\_\_\_\_ Exp. Date: ☐ ☐ / ☐ ☐

Name of Cardholder: \_\_\_\_\_

Signature of Cardholder: \_\_\_\_\_

ZIP Code of Cardholder's Billing Address \_\_\_\_\_

Please Note: Should your credit card total be miscalculated, AHLA will charge your credit card for the correct amount. To receive a refund of the registration fee paid minus \$125, cancellation notice must be received in writing by September 18, 2015.

**AHLA**

1620 Eye Street, NW  
6th Floor  
Washington, DC 20006-4010

# Fraud and Compliance Forum

September 27-29, 2015  
Hilton Baltimore Hotel, Baltimore, MD

For updates and to register, go to  
[www.healthlawyers.org/programs](http://www.healthlawyers.org/programs)