

APRIL 2024

UT LAW | CLE

TEXAS Law
The University of Texas at Austin
School of Law

HOSPITAL OPERATIONAL OPPORTUNITIES AND CHALLENGES

DAPHNE WALKER, JPS Health Network, Ft. Worth, TX

TRENT KRIENKE, Reed, Claymon, Meeker, Krienke & Spurck, PLLC, Austin, TX

KENYA S. WOODRUFF, Katten Muchin Rosenman LLP, Dallas, TX

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**New Compliance
Guidance**

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OIG Modernization of Compliance Program Guidance Documents (4/25/23)

- OIG will no longer publish updated or new CPGs in the Federal Register. All current, updated, and new CPGs will be available on their website
- OIG will publish a General CPG (GCPG) that applies to all individuals and entities involved in the health care industry.
- Second, OIG will publish industry-specific CPGs (ICPGs) for different types of providers, suppliers, and other participants in health care industry subsectors or ancillary industry sectors relating to Federal health care programs.

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OIG Modernization of Compliance Program Guidance Documents (4/25/23)

- The 2023 announcement explained that OIG anticipates that the first two industry segment-specific CPGs (ICPGs) will address Medicare Advantage and nursing facilities. OIG intends to publish these guidance documents in 2024. For the next two ICPGs, OIG anticipates addressing hospitals and clinical laboratories. If you would like to provide feedback related to any of these industry segments before the publication of these ICPGs, please contact us at Compliance@oig.hhs.gov.

<https://www.federalregister.gov/documents/2023/04/25/2023-08326/modernization-of-compliance-program-guidance-documents>

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EMTALA

5

TriStar Centennial Medical Center

- In 2021, Tristar Centennial Medical Center in Nashville, Tennessee agreed to pay \$725,000 to settle allegations that Tristar Centennial violated EMTALA.
- Tristar Centennial allegedly failed to provide further medical examination and treatment to 29 patients experiencing unstable psychiatric emergency conditions despite having staff and facilities available to provide treatment.

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Title search: Hospital Operational Opportunities and Challenges

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First appeared as part of the conference materials for the
35th Annual Health Law Conference session

"Hospital Operational Opportunities and Challenges "