

**APRIL 2024**

**UT LAW | CLE**

**TEXAS Law**  
The University of Texas at Austin  
School of Law

# **HOSPITAL OPERATIONAL OPPORTUNITIES AND CHALLENGES**

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**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](mailto: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

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## 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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First appeared as part of the conference materials for the  
35<sup>th</sup> Annual Health Law Conference session

"Hospital Operational Opportunities and Challenges "