

Regulatory Issues and Compliance: Stark, Fraud and Abuse and CMS Requirements

THIRD NATIONAL ACCOUNTABLE CARE
ORGANIZATION (ACO) SUMMIT

Robert G. Homchick
Davis Wright Tremaine, LLP

Bruce Merlin Fried
SNR Denton US LLP



Regulatory, operational issues at formation?



Fraud and abuse compliance?



Likelihood of enforcement?



Key compliance issues?





1. What regulatory or operational issues are ACO participants finding to be most difficult in the **formation** stage?





2. What are likely to be biggest fraud & abuse compliance **risks** for participants in MSSP?



3. Does the government's desire to promote the success of ACOs significantly reduce the likelihood of any **enforcement** action?





4. What are the key **compliance** issues for those providers who are participating in commercial ACOs?



Thank you!





Robert G. Homchick
Davis Wright Tremaine LLP
206.757.8063
roberthomchick@dwt.com



Bruce Merlin Fried
SNR Denton US LLP
202.408.9159
bruce.fried@snrdenton.com