

Summary of Contents

Volume 1

PART I. GUIDES

- Guide G1. Chapters of General Applicability
- Guide G2. Chapters for Hospitals
- Guide G3. Chapters for Nursing Homes
- Guide G4. Chapters for Physicians
- Guide G5. Chapters for Quality Improvement Organizations (QIOs) [also known as Peer Review Organizations (PROs)]
- Guide G6. Chapters for Risk-Sharing Organizations: Managed Care Entities, HMOs, Competitive Medical Plans, Medicare+Choice and Pace Providers
- Guide G7. Chapters for Insurance Companies
- Guide G8. Civil Money Penalties
- Guide G9. Exclusion Authorities

PART II. TEXT

- Chapter 1. Persons and Entities Subject to Sanctions
- Chapter 2. Sanctions in the Medicare Statute
- Chapter 3. Sanctions in the Medicaid Statute
- Chapter 4. Sanctions in Title XI of the Social Security Act
- Chapter 5. Regulations: Sanctions in the Medicare Statute
- Chapter 6. Regulations: Sanctions in the Medicaid Statute
- Chapter 7. Regulations: Sanctions in Title XI

Volume 2

Part III Appendixes

Appendix A. Safe Harbor Regulations and Guidance for Advisory Opinions

- Appendix A1. Initial Safe Harbor Regulations, July 29, 1991
- Appendix A2. Additional Safe Harbor Regulations, November 5, 1992
- Appendix A3. Additional Safe Harbor Provisions under the OIG Anti-Kickback Statute, September 21, 1993
- Appendix A4. Clarification of the OIG Safe Harbor Anti-Kickback Provisions, July 21, 1994
- Appendix A5. New Safe Harbor for Protecting Health Plans, January 25, 1996
- Appendix A6. Solicitations of New Safe Harbors and Modifications to Existing Safe Harbors
- Appendix A7. Medicare and State Health Care Programs: Fraud and Abuse; Safe Harbor Under the Anti-Kickback Statute For Waiver of Beneficiary Coinsurance and Deductible Amounts

- Appendix A8. Solicitation of New Safe Harbors and Special Fraud Alerts
- Appendix A9. Solicitation of New Safe Harbors and Special Fraud Alerts—Update
- Appendix A10. Safe Harbors for Certain Electronic Prescribing and Electronic Health Records Arrangements Under the Anti-Kickback Statute
- Appendix A11. Solicitation of New Safe Harbors and Special Fraud Alerts
- Appendix A12. OIG Notice, Health Care Programs, Fraud and Abuse; Intent to Form the Negotiated Rulemaking Committee for Shared Risk Exception
- Appendix A13. Clarification of the Initial OIG Safe Harbor Provisions and Establishment of Additional Safe Harbor Provisions Under the Anti-Kickback Statute; Final Rule
- Appendix A14. Statutory Exception to the Anti-Kickback Statute for Shared Risk Arrangements; Final Rule; 64 FR 63504, November 19, 1999
- Appendix A15. Solicitation of New Safe Harbors and Special Fraud Alerts; 64 FR 69217, December 10, 1999
- Appendix A16. Solicitation of New Safe Harbors and Special Fraud Alerts
- Appendix A17. Civil Money Penalty Safe Harbor to Protect Payment of Medicare Supplemental Insurance and Medigap Premiums for ESRD Beneficiaries, Proposed Rule; 65 FR 25460, May 2, 2000
- Appendix A18. Ambulance Restocking Safe Harbor Under the Anti-Kickback Statute, Proposed Rule; 65 FR 32060, May 22, 2000
- Appendix A19. Medicare and State Health Care Programs: Fraud and Abuse; Ambulance Replenishing Safe Harbor Under the Anti-Kickback Statute; 66 FR 62979, December 4, 2001
- Appendix A20. Medicare and State Health Care Programs: Fraud and Abuse; Ambulance Replenishing Safe Harbor Under the Anti-Kickback Statute; 66 FR 63749, December 10, 2001 (Corrected)
- Appendix A21. Solicitation of New Safe Harbors and Special Fraud Alerts; 66 FR 65460, December 19, 2001
- Appendix A22. Safe Harbor for Federally Qualified Health Centers Under the Anti-Kickback Statute; 70 FR 38081, July 1, 2005
- Appendix A23. Safe Harbor for Certain Electronic Prescribing Arrangements Under the Anti-Kickback Statute; 70 FR 59015, October 11, 2005
- Appendix A24. HCFA Final Rule: Medicare Program; Physicians' Referrals; Issuance of Advisory Opinions
- Appendix A25. HCFA Final Rule: Medicare and Medicaid Programs; Physicians' Referrals to Health Care Entities With Which They Have Financial Relationships
- Appendix A26. OIG Final Rule: Medicare and State Health Programs: Fraud and Abuse; Issuance of Advisory Opinions by the OIG
- Appendix A27. HCFA Proposed Rule: Medicare Program; Medicare Integrity Program, Intermediary and Carrier Functions, and Conflict of Interest Requirements
- Appendix A28. HCFA Final Rule: Medicare Programs; Incentive Programs — Fraud and Abuse
- Appendix A29. Medicare and State Health Care Programs: Fraud and Abuse; Safe Harbor for Federally Qualified Health Centers Arrangements Under the Anti-Kickback Statute; 72 FR 56632, October 4, 2007
- Appendix A30. Solicitation of New Safe Harbors and Special Fraud Alerts; 72 FR 71868, December 19, 2007

SUMMARY OF CONTENTS

- Appendix A31. Solicitation of New Safe Harbors and Special Fraud Alerts; 75 FR 81557, December 28, 2010
- Appendix A32. Proposed Electronic Health Records Safe Harbor Under the Anti-Kickback Statute, 78 FR 21314, April 10, 2013
- Appendix A33. Solicitation of New Safe Harbors and Special Fraud Alerts, 78 FR 78807, December 27, 2013
- Appendix A34. Medicare and State Health Care Programs: Fraud and Abuse; Electronic Health Records Safe Harbor Under the Anti-Kickback Statute; 78 FR 79202, December 27, 2013
- Appendix A35. Medicare and State Health Care Programs: Fraud and Abuse; Revisions to Safe Harbors Under the Anti-Kickback Statute, and Civil Monetary Penalty Rules Regarding Beneficiary Inducements and Gainsharing; 79 FR 59717, October 3, 2014
- Appendix A36. Medicare and State Health Care Programs: Final Rule: Fraud and Abuse; Revisions to the Safe Harbors Under the Anti-Kickback Statute and Civil Monetary Penalty Rules Regarding Beneficiary Inducements; 81 FR 88368, December 7, 2016
- Appendix A37. Fraud and Abuse; Removal of Safe Harbor Protection for Rebates Involving Prescription Pharmaceuticals and Creation of New Safe Harbor Protection for Certain Point-of-Sale Reductions in Price on Prescription Pharmaceuticals and Certain Pharmacy Benefit Manager Service Fees; 84 FR 2340, February 6, 2019
- Appendix A38. Medicare and State Healthcare Programs: Fraud and Abuse; Revisions To Safe Harbors Under the Anti-Kickback Statute, and Civil Monetary Penalty Rules Regarding Beneficiary Inducements; 84 FR 55694, October 17, 2019
- Appendix A39. Fraud and Abuse; Removal of Safe Harbor Protection for Rebates Involving Prescription Pharmaceuticals and Creation of New Safe Harbor Protection for Certain Point-of-Sale Reductions in Price on Prescription Pharmaceuticals and Certain Pharmacy Benefit Manager Service Fees; A Rule by the Health and Human Services Department on 11/30/2020; 85 FR 76666, November 30, 2020
- Appendix A40. Medicare and State Health Care Programs: Fraud and Abuse; Revisions to Safe Harbors Under the Anti-Kickback Statute, and Civil Monetary Penalty Rules Regarding Beneficiary Inducements; A Rule by the Health and Human Services Department on 12/02/2020; 85 FR 77684, December 2, 2020
- Appendix A41. HHS Office of Inspector General Fact Sheet: Final Rule: Revisions to the Safe Harbors Under the Anti-Kickback Statute and Civil Monetary Penalty Rules Regarding Beneficiary Inducements; November 2020
- Appendix A42. OIG Annual Inflation Updates to the Annual Cap on Patient Engagement Tools and Supports Under 42 CFR § 1001.952(hh)
- Appendix B. Inspector General Fraud Alerts, Bulletins, and Open Letters**
- Appendix B1. Publication of OIG Special Fraud Alerts, December 19, 1994
- Appendix B2. New Fraud Alert for Home Health Fraud, and Fraud and Abuse in the Provision of Medical Supplies to Nursing Facilities, August 10, 1995
- Appendix B3. Inspector General Publication of the Medicare Advisory Bulletin on Hospice Benefits, November 2, 1995
- Appendix B4. Inspector General Publication of OIG Special Fraud Alert: Fraud and Abuse in the Provision of Services in Nursing Facilities, June 17, 1996
- Appendix B5. Inspector General Publication of OIG Notice: Publication of the Medicare Beneficiary Advisory Bulletin on HMO Arrangements

- Appendix B6. OIG Notice of Intent to Develop Regulations: Solicitation of New Safe Harbors and Special Fraud Alerts
- Appendix B7. OIG Notice: Publication of OIG Special Fraud Alert: Fraud and Abuse in Nursing Home Arrangements With Hospices
- Appendix B8. OIG News Release and Related OIG Provider Self-Disclosure Protocol
- Appendix B9. Special Advisory Bulletin on the Patient Anti-Dumping Statute; 64 FR 61353, November 10, 1999
- Appendix B10. OIG Notice: Publication of OIG Special Fraud Alert on Physician Liability for Certification in the Provision of Medical Equipment and Supplies and Home Health Services
- Appendix B11. Special Advisory Bulletin on Gainsharing Arrangements and CMP's for Hospital Payments to Physicians to Reduce or Limit Services to Beneficiaries; 64 FR 37985, July 14, 1999
- Appendix B12. Special Advisory Bulletin on the Effect of Exclusion from Participation in Federal Health Care Programs; 64 FR 52791, September 30, 1999
- Appendix B13. OIG Special Fraud Alert on Rental of Space in Physician Offices by Persons or Entities to Which Physicians Refer; 65 FR 9274, February 24, 2000
- Appendix B14. OIG Special Advisory Bulletin: Practice of Business Consultants
- Appendix B15. Publication of OIG Special Advisory Bulletin on Practices of Business Consultants; 66 FR 36583, July 12, 2001
- Appendix B16. Publication of OIG Special Advisory Bulletin on Offering Gifts and Other Inducements to Beneficiaries; 67 FR 55855, August 30, 2002
- Appendix B17. Publication of OIG Special Advisory Bulletin on Offering Gifts and Other Inducements to Beneficiaries, Correction; 67 FR 57063, September 6, 2002
- Appendix B18. Publication of OIG Special Fraud Alert on Telemarketing by Durable Medical Equipment Suppliers; 68 FR 10254, March 4, 2003
- Appendix B19. Publication of OIG Special Fraud Alert on Telemarketing by Durable Medical Equipment Suppliers, Correction; 68 FR 11403, March 10, 2003
- Appendix B20. Publication of OIG Special Advisory Bulletin on Contractual Joint Ventures
- Appendix B21. OIG Special Advisory Bulletin on Patient Assistance Programs for Medicare Part D Enrollees; 70 FR 70623, November 22, 2005
- Appendix B22. Publication of OIG's Guidelines for Evaluating State False Claims Acts
- Appendix B23. Response to Request for Guidance Regarding Certain Physician Investments in the Medical Device Industries
- Appendix B24. Updated Special Fraud Alert: Telemarketing by Durable Medical Equipment Suppliers
- Appendix B25. An Open Letter to Health Care Providers, February 1997
- Appendix B26. An Open Letter to Health Care Providers, March 2000
- Appendix B27. An Open Letter to Health Care Providers, November 2001
- Appendix B28. An Open Letter to Health Care Providers, April 2006
- Appendix B29. An Open Letter to Health Care Providers, March 2009
- Appendix B30. Special Advisory Bulletin: Average Manufacturer Price and Average Sales Price Reporting Requirements
- Appendix B31. Solicitation of New Safe Harbors and Special Fraud Alerts; 75 FR 81557, December 28, 2010

SUMMARY OF CONTENTS

- Appendix B32. OIG Alerts Physicians to Exercise Caution When Reassigning Their Medicare Payments
- Appendix B33. Special Fraud Alert: Physician-Owned Entities, March 26, 2013
- Appendix B34. Special Fraud Alert: Laboratory Payments to Referring Physicians, June 25, 2014
- Appendix B35. Special Advisory Bulletin: Pharmaceutical Manufacturer Copayment Coupons, September 2014
- Appendix B36. OIG Policy Statement Regarding Hospitals That Discount or Waive Amounts Owed by Medicare Beneficiaries for Self-Administered Drugs Dispensed in Outpatient Settings, October 29, 2015
- Appendix B37. OIG Alert: Improper Arrangements and Conduct Involving Home Health Agencies and Physicians, June 22, 2016
- Appendix B38. Updated Special Advisory Bulletin on the Effect of Exclusion from Participation in Federal Health Care Programs; Special Advisory Bulletin, May 8, 2013
- Appendix B39. Recommended Preliminary Questions and Supplementary Information for Addressing Requests for OIG Advisory Opinions in Accordance with Section 1128D of the Social Security Act and 42 CFR Part 1008, August 30, 2016
- Appendix B40. Special Fraud Alert: Speaker Programs
- Appendix B41. OIG Enforcement Policy Statement Regarding OIG's Assessment of Advisory Opinion Requests, January 6, 2022
- Appendix B42. Special Fraud Alert: OIG Alerts Practitioners to Exercise Caution When Entering Into Arrangements with Purported Telemedicine Companies (July 20, 2022)
- Appendix B43. HHS Fraud Alert: Scammers Steal Money From the Public Through Fake HHS Websites and Social Media Schemes, February 24, 2023
- Appendix B44. HHS Consumer Alert: Fraud Schemes Targeting Native American Communities in Behavioral Health Treatment Centers, May 16, 2023
- Appendix B45. OIG Report on Medicare Part B Spending on Clinical Diagnostic Laboratory Tests in 2022
- Appendix B46. OIG Report: Medicare Remains Vulnerable to Fraud, Waste, and Abuse Related to Off-the-Shelf Orthotic Braces, Which May Result in Improper Payments and Impact the Health of Enrollees, Issued on 5-24-24, posted on 5-29-24, Report number: A-09-21-03019
- Appendix B47. OIG Special Fraud Alert: Suspect Payments in Marketing Arrangements Related to Medicare Advantage and Providers (12-11-24)

Volume 3

Part III Appendixes (Continued)

Appendix C. Compliance Guides

- Appendix C1. OIG Notice: Publication of OIG Compliance Program Guidance for Clinical Laboratories
- Appendix C2. OIG Notice: Publication of the OIG Compliance Program Guidance for Hospitals
- Appendix C3. OIG Notice: Publication of the OIG Compliance Program Guidance for Home Health Agencies
- Appendix C4. OIG Notice: Publication of the OIG Compliance Program Guidance for Third-Party Medical Billing Companies

- Appendix C5. Compliance Program Guidance for the Durable Medical Equipment, Prosthetics, Orthotics and Supply Industry; 64 FR 36368, July 16, 1999
- Appendix C6. Compliance Program Guidance for Hospices; 64 FR 54031, October 5, 1999
- Appendix C7. Compliance Program Guidance for Medicare+Choice Organizations Offering Coordinated Care Plans; 64 FR 61893, November 15, 1999
- Appendix C8. Compliance Program Guidance for Nursing Facilities; 65 FR 14289, March 16, 2000
- Appendix C9. Compliance Program Guidance for Individual and Small Group Physician Practices; 65 FR 59434, October 5, 2000
- Appendix C10. Solicitation of Information and Recommendations for Developing a Compliance Risk Guidance for the Ambulance Industry
- Appendix C11. Draft OIG Compliance Program Guidance for Ambulance Suppliers
- Appendix C12. Solicitation of Information and Recommendations for Revising the Compliance Program Guidance for the Hospital Industry
- Appendix C13. Draft OIG Compliance Program Guidance for Pharmaceutical Manufacturers
- Appendix C14. OIG Compliance Program Guidance for Ambulance Suppliers
- Appendix C15. OIG Compliance Program Guidance for Pharmaceutical Manufacturers
- Appendix C16. Solicitation of Information and Recommendations for Developing Compliance Program Guidance for Recipients of NIH Research Grants
- Appendix C17. OIG Draft Supplemental Compliance Program Guidance for Hospitals
- Appendix C18. OIG Supplemental Compliance Program Guidance for Hospitals
- Appendix C19. OIG Compliance Program Guidance for Recipients of PHS Research Awards; 70 FR 71312, November 28, 2005
- Appendix C20. Solicitation of Information and Recommendations for Revising the Compliance Program Guidance for Nursing Facilities
- Appendix C21. Draft OIG Supplemental Compliance Program Guidance for Nursing Facilities
- Appendix C22. OIG Supplemental Compliance Program Guidance for Nursing Facilities; 73 FR 56832-02, September 30, 2008
- Appendix C23. Practical Guidance for Health Care Governing Boards on Compliance Oversight, April 20, 2015
- Appendix C24. OIG Guidance on IRO Independence and Objectivity
- Appendix C25. Office of Inspector General Policy Statement Regarding Gifts of Nominal Value to Medicare and Medicaid Beneficiaries, December 7, 2016
- Appendix C26. Measuring Compliance Program Effectiveness: A Resource Guide, Issue Date: March 27, 2017
- Appendix C27. A Roadmap for New Physicians: Avoiding Medicare and Medicaid Fraud and Abuse
- Appendix C28. Guidance for Submitting a Contractor Self-Disclosure
- Appendix C29. HHS OIG Grant Self-Disclosure Program June 2019
- Appendix C30. HHS OIG Grant Self-Disclosure Submission Form
- Appendix C31. Criteria for Implementing Section 1128(b)(7) Exclusion Authority April 18, 2016
- Appendix C32. Notice of Waiver of Certain Fraud and Abuse Laws in Connection With the Part D Payment Modernization Model, November 15, 2019

SUMMARY OF CONTENTS

- Appendix C33. Notice of Amended Waivers of Certain Fraud and Abuse Laws in Connection With the Bundled Payments for Care Improvement Advanced Model, January 1, 2020, December 13, 2019
- Appendix C34. The Office of Inspector General Exclusion Program July 17, 2019
- Appendix C35. HHS Toolkit for Calculating Opioid Levels and Identifying Patients At Risk of Misuse or Overdose: R and SQL Programming Code
- Appendix C36. OIG’s Health Care Fraud Self-Disclosure Protocol (updated November 8, 2021)
- Appendix C37. OIG Criteria for implementing section 1128(b)(7) exclusion authority (April 18, 2016)
- Appendix C38. OIG Report: CMS’s Oversight of Medicare Payments for the Highest Paid Molecular Pathology Genetic Test Was Not Adequate To Reduce the Risk of up to \$888 Million in Improper Payments, June 1, 2023, A-09-22-03010
- Appendix C39. CMS Nationwide Audits of Medicare Part C High-Risk Diagnosis Codes, June 2023
- Appendix C40. OIG Nursing Facility Industry Segment-Specific Compliance Program Guidance
- Appendix C41. HHS-OIG Desk Reviews—Identifying Common Quality Deficiencies Found in Single Audit Reports—February 2024
- Appendix C42. HHS-OIG Quality Control Reviews—Identifying Common Quality Deficiencies Found in Single Audits Reports—February 2024
- Appendix C43. OIG Medicaid Fraud Control Units Annual Report: Fiscal Year 2024 (March 2025)
- Appendix C44. OIG 2024 Performance Data for the Senior Medicare Patrol Projects (June 2025)
- Appendix C45. Medicare Payments for Evaluation and Management Services Provided on the Same Day as Eye Injections Were at Risk for Noncompliance With Medicare Requirements (May 2025)

Appendix D. Advisory Opinions under the Stark Bill

- Appendix D1. Advisory Opinion No. HCFA-AO-98-001, October 1998
- Appendix D2. Advisory Opinion No. HCFA-AO-98-002, November 1998

Appendix E. Selected Recent Advisory Opinions

- Appendix E1. Advisory Opinion 20-01, January 13, 2020
- Appendix E2. Advisory Opinion 20-02, January 22, 2020
- Appendix E3. Modification of Advisory Opinion 20-02, June 1, 2022
- Appendix E4. Advisory Opinion 20-03, July 1, 2020
- Appendix E5. Advisory Opinion 20-04, July 24, 2020
- Appendix E6. Advisory Opinion 20-05, September 23, 2020
- Appendix E7. Advisory Opinion 20-06, December 23, 2020
- Appendix E8. Advisory Opinion 20-07, December 28, 2020
- Appendix E9. Advisory Opinion 20-08, December 30, 2020
- Appendix E10. Advisory Opinion 20-09, December 31, 2020
- Appendix E11. Advisory Opinion 21-01, March 23, 2021
- Appendix E12. Advisory Opinion 21-02, April 29, 2021
- Appendix E13. Advisory Opinion 21-03, May 17, 2021
- Appendix E14. Advisory Opinion 21-04, May 19, 2021
- Appendix E15. Advisory Opinion 21-05, May 20, 2021
- Appendix E16. Advisory Opinion 21-06, June 29, 2021

- Appendix E17. Advisory Opinion 21-07, July 7, 2021
- Appendix E18. Advisory Opinion 21-08, July 8, 2021
- Appendix E19. Advisory Opinion 21-09, July 19, 2021
- Appendix E20. Advisory Opinion 21-10, August 6, 2021
- Appendix E21. Advisory Opinion 21-11, August 19, 2021
- Appendix E22. Advisory Opinion 21-12, September 15, 2021
- Appendix E23. Advisory Opinion 21-13, October 4, 2021
- Appendix E24. Modification of Advisory Opinion Advisory Opinion 21-13
- Appendix E25. Advisory Opinion 21-14, October 5, 2021
- Appendix E26. Advisory Opinion 21-15, November 10, 2021
- Appendix E27. Advisory Opinion 21-16, November 16, 2021
- Appendix E28. Advisory Opinion 21-17, November 19, 2021
- Appendix E29. Advisory Opinion 21-18, November 22, 2021
- Appendix E30. Advisory Opinion 21-19, December 6, 2021
- Appendix E31. Advisory Opinion 21-20, December 16, 2021
- Appendix E32. Advisory Opinion 22-01, January 19, 2022
- Appendix E33. Advisory Opinion 22-02, February 9, 2022
- Appendix E34. Advisory Opinion 22-03, February 14, 2022
- Appendix E35. Advisory Opinion 22-04, March 2, 2022
- Appendix E36. Advisory Opinion 22-05, March 16, 2022
- Appendix E37. Advisory Opinion 22-06, April 11, 2022
- Appendix E38. Advisory Opinion 22-07, April 25, 2022
- Appendix E39. Advisory Opinion 22-08, April 27, 2022
- Appendix E40. Advisory Opinion 22-09, April 28, 2022
- Appendix E41. Advisory Opinion 22-10, May 2, 2022
- Appendix E42. Advisory Opinion 22-11, May 25, 2022
- Appendix E43. Advisory Opinion 22-12, June 1, 2022
- Appendix E44. Advisory Opinion 22-13, June 23, 2022
- Appendix E45. Advisory Opinion 22-14, June 29, 2022
- Appendix E46. Advisory Opinion 22-15, July 5, 2022
- Appendix E47. Advisory Opinion 22-16, August 19, 2022
- Appendix E48. Advisory Opinion 22-17, September 6, 2022
- Appendix E49. Advisory Opinion 22-18, September 20, 2022
- Appendix E50. Advisory Opinion 22-19, October 5, 2022
- Appendix E51. Advisory Opinion 22-20, December 19, 2022
- Appendix E52. Advisory Opinion 22-21, December 23, 2022
- Appendix E53. Advisory Opinion 22-22, December 28, 2022
- Appendix E54. Advisory Opinion 23-01, February 23, 2023
- Appendix E55. Advisory Opinion 23-02, February 28, 2023
- Appendix E56. Advisory Opinion 23-03, March 29, 2023

SUMMARY OF CONTENTS

- Appendix E57. Advisory Opinion 20-04, Issued with Modifications Posted July 24, 2020; Last updated April 24, 2023
- Appendix E58. Advisory Opinion 23-04
- Appendix E59. Advisory Opinion 23-05
- Appendix E60. Advisory Opinion 23-06
- Appendix E61. Advisory Opinion 23-07
- Appendix E62. Advisory Opinion 23-08
- Appendix E63. Advisory Opinion 23-09
- Appendix E64. Advisory Opinion 23-10
- Appendix E65. Advisory Opinion 23-11
- Appendix E66. Advisory Opinion 23-12
- Appendix E67. Advisory Opinion 23-13
- Appendix E68. Advisory Opinion 23-14
- Appendix E69. Advisory Opinion 23-15
- Appendix E70. Advisory Opinion 24-01
- Appendix E71. Advisory Opinion 24-02
- Appendix E72. Advisory Opinion 24-03
- Appendix E73. Advisory Opinion 24-04
- Appendix E74. Advisory Opinion 24-05
- Appendix E75. Advisory Opinion 24-06
- Appendix E76. Advisory Opinion 24-07
- Appendix E77. Advisory Opinion 24-08
- Appendix E78. Advisory Opinion 24-09
- Appendix E79. Advisory Opinion 24-10
- Appendix E80. Advisory Opinion 24-11
- Appendix E81. Advisory Opinion 24-12
- Appendix E82. Advisory Opinion 24-13
- Appendix E83. Advisory Opinion 25-01
- Appendix E84. Advisory Opinion 25-02
- Appendix E85. Advisory Opinion 25-03
- Appendix E86. Advisory Opinion 25-04
- Appendix E87. Advisory Opinion 25-05
- Appendix E88. Advisory Opinion 25-06
- Appendix E89. Advisory Opinion 25-07
- Appendix E90. Advisory Opinion 25-08

Volume 4

Part III Appendixes (Continued)

Appendix F. Selected Recent OIG Negotiated Corporate Integrity Agreements (CIAs) with Health Care Providers and Other Entities as Part of the Settlement of Federal Health Care Program

Investigations

- Appendix F1. Agendia, Inc., Irvine, CA, January 13, 2021
- Appendix F2. Michigan Physicians Group, P.C. and Dinesh Shah, M.D., Berkley, MI, February 11, 2021
- Appendix F3. Life Spine, Inc., Huntley, IL, March 17, 2021
- Appendix F4. UCI Medical Affiliates of South Carolina, Inc. and Doctors Care, P.A., Columbia, SC, April 6, 2021
- Appendix F5. Hanora Medical Center, P.L.L.C. and Benjamin C. Udoh, M.D., Fayetteville, NC, April 23, 2021
- Appendix F6. University of Miami, May 7, 2021
- Appendix F7. eClinicalWorks, LLC, Westborough, MA, Amendment, May 7, 2021
- Appendix F8. SavaSeniorCare, LLC and SavaSeniorCare Administrative and Consulting, LLC, Sandy Springs, GA, May 21, 2021
- Appendix F9. Gyarteng-Dakwa, Kwadwo and the HEAG Pain Management Center, PA, Greensboro, NC, May 25, 2021
- Appendix F10. Alliance Parent, Inc., Irving, TX, July 8, 2021
- Appendix F11. The County of San Mateo and San Mateo Medical Center, San Mateo, CA, July 29, 2021
- Appendix F12. Azinheira, Lisa and L.A. Vision, LLC, Hartford, CT, August 6, 2021
- Appendix F13. Sutter Health, Sutter Bay Medical Foundation, and Sutter Valley Medical Foundation, Roseville, CA, August 30, 2021
- Appendix F14. Align Health and Holistic Medical Center, Inc; Align Health Management, Inc.; Eric Anderson, P.A. dba Anderson Chiropractic Clinic; Eric Anderson, D.C.; and Hilary Anderson, Maryville, TN, September 7, 2021
- Appendix F15. Pal, M.D., Ashish and Interventional Cardiology and Vascular Consultants, PLC, Orlando, FL, September 7, 2021
- Appendix F16. Apotex Corp., Weston, FL, September 30, 2021
- Appendix F17. Olive Street Pharmacy, LLC, Creve Coeur, MO, September 30, 2021
- Appendix F18. Sandoz Inc., Princeton, NJ, September 30, 2021
- Appendix F19. Taro Pharmaceuticals U.S.A., Inc., Hawthorne, NY, September 30, 2021
- Appendix F20. MD Spine Solutions LLC, D/B/A MD Labs Inc., Denis Grizelj and Matthew Rutledge, Reno, NV, October 19, 2021
- Appendix F21. Arthrex, Inc., Naples, FL, November 8, 2021
- Appendix F22. Flower Mound Hospital Partners, LLC D/B/A Texas Health Presbyterian Hospital Flower Mound, Flower Mound, TX, November 30, 2021
- Appendix F23. Poonia, MD, Amit; New Jersey Interventional Pain Management Center, PC; Advanced Interventional Pain Management Center, LLC; Global Anesthesia Group, LLC; Springfield Surgery Center, LLC; Park Avenue Surgery Center, LLC and Endo Surgi Center of Old Bridge, LLC, Edison, NJ, December 3, 2021
- Appendix F24. Princeton Pathology Services, P.A., Newtown, PA, December 7, 2021
- Appendix F25. Phan, RPH, Bachthu (Theresa) and Lan Apothecary, Inc., Philadelphia, PA, December 10, 2021
- Appendix F26. Bellamah, M.D., David and Bellamah Vein and Surgery, PLLC, DBA Bellamah Vein Center, Missoula, MT, December 14, 2021

SUMMARY OF CONTENTS

- Appendix F27. Lipshutz and Wills Medical Group, LLP D/B/A Monos Health, Jeremy M. Lipshutz, M.D., Ltd., 215 Surgery Center, LLC, and Dr. Jeremy Lipshutz, Henderson, NV, December 28, 2021
- Appendix F28. Wills, PC, Heath, Dr. Heath Wills, and Bandar Enterprises, LLC, Las Vegas, NV, December 28, 2021
- Appendix F29. Gaynor, DPM, Robert and Foot Care Store, Inc. d/b/a Dia-Foot, Wellington, FL, December 30, 2021
- Appendix F30. Cardinal Health 108, LLC, Dublin, OH, January 21, 2022
- Appendix F31. Escandon, M.D, P.A., Jose A. D/B/A Escandon Diagnostic Clinic and Dr. Jose A. Escandon, Jr., Mission, TX, February 14, 2022
- Appendix F32. Mallinckrodt plc, Hazelwood, MO, March 3, 2022
- Appendix F33. Providence Health & Services-Washington, Renton, WA, March 17, 2022

Volume 5

Part III Appendixes (Continued)

Appendix F. Selected Recent OIG Negotiated Corporate Integrity Agreements (CIAs) with Health Care Providers and Other Entities as Part of the Settlement of Federal Health Care Program Investigations (Continued)

- Appendix F34. Physician Partners of America, LLC; Florida Pain Relief Group, PLLC; Texas Pain Relief Group, PLLC, Physician Partners of America CRNA Holdings, LLC; Medical Tox Labs, LLC; Medical DNA Labs, LLC; and Rodolfo Gari, M.D., Tampa, FL, March 24, 2022
- Appendix F35. Radaes LLC, Wake Forest, NC, March 30, 2022
- Appendix F36. Steward Good Samaritan Medical Center, Westwood, MA, April 8, 2022
- Appendix F37. VirtuOx, Inc., Coral Springs, FL, May 11, 2022
- Appendix F38. SNAP Diagnostics, LLC and Gil Raviv, Wheeling, IL, June 1, 2022
- Appendix F39. Solera Specialty Pharmacy, LLC and Nicholas Saraniti, Pompano Beach, FL, July 8, 2022
- Appendix F40. Eastern Iowa Dermatology, PLC and Manish G. Kumar, MD, Bettendorf, IA, July 21, 2022
- Appendix F41. Gonzaga, M.D., Melvin, Gonzaga Interventional Pain Management, and Garrett Anesthesia and Pain Management, P.A., LaVale, MD, July 22, 2022
- Appendix F42. Ventura County, Ventura, CA, August 11, 2022
- Appendix F43. Ventura County Medi-Cal Managed Care Commission, Ontario, CA, August 11, 2022
- Appendix F44. Kamali, M.D., Azizulah (Aziz) and Aziz Kamali, M.D., Inc., Stockton, CA, August 12, 2022
- Appendix F45. Phillips RS North America LLC, F/K/A Respironics, Inc., Pittsburgh, PA, August 25, 2022
- Appendix F46. Biotronik, Inc., Lake Oswego, OR, August 26, 2022
- Appendix F47. Vision Quest Industries, Incorporated, and General Orthocare, Inc., Irvine, CA, August 26, 2022
- Appendix F48. CHC Holdings, LLC D/B/A Carter Healthcare, Oklahoma City, OK, September 26, 2022

- Appendix F49. CHC-FLA, LLC, Oklahoma City, OK, September 26, 2022
- Appendix F50. Greene, M.D., Kevin P. and Feel Well Health Center of Southington, P.C., Bristol, CT, November 8, 2022
- Appendix F51. Sierra Vista Regional Medical Center and Twin Cities Community Hospital, Templeton, CA, December 5, 2022
- Appendix F52. Jasdeep Sidana, M.D., DOCS Medical Group, Inc. d/b/a DOCS Medical, DOCS Medical Inc., DOCS Urgent Care LLP, Lung Docs of CT, P.C., Epic Family Physicians, LLP, and Continuum Medical Group, LLC, East Haven, CT, December 13, 2022
- Appendix F53. Advanced Bionics LLC, Valencia, CA, December 19, 2022
- Appendix F54. BioTelemetry, Inc. and CardioNet, LLC, Malvern, PA, December 19, 2022
- Appendix F55. Pandya, M.D., Arati D. A/K/A Aarti D. Pandya, M.D. and Aarti Pandya, M.D., P.C., Conyers, GA, December 21, 2022
- Appendix F56. Hot Springs Heart and Vascular, P.A., and Dr. Jeffrey G. Tauth, Hot Springs, AR, December 28, 2022
- Appendix F57. Florida Cardiology, P.A.; Sandeep Bajaj, M.D.; Karan Reddy, M.D.; Claudio Manubens, M.D.; Milan Kothari, M.D.; Sayeo Hussain, M.D.; Raviprasad Subraya, M.D.; Harish Patil, M.D.; Edwin Martinez, M.D., Winter Park, FL, January 6, 2023
- Appendix F58. United Seating and Mobility, LLC D/B/A Numotion, Brentwood, TN, January 31, 2023
- Appendix F59. Chung, M.D., John and Skin Cancer and Cosmetic Dermatology Center, PC, Chattanooga, TN, May 26, 2023
- Appendix F60. Saini, M.D., Dr. Hari P. and Carolina Heart and Leg Center, Fayetteville, NC, May 26, 2023
- Appendix F61. Balotin, Gregory H., Ponte Vedra Beach, FL, June 14, 2023
- Appendix F62. Rockport Healthcare Services and Riverside Healthcare & Wellness Centre DBA Alta Vista Healthcare and Wellness Center, Los Angeles, CA, June 14, 2023
- Appendix F63. Thyroid Specialty Laboratory, Inc. D/B/A Ten Healthcare, 3890 Management, LLC and Ten Marketing, LLC, Fenton, MO, July 25, 2023
- Appendix F64. Lincare Inc., Clearwater, FL, August 10, 2023
- Appendix F65. Nevels, M.D., Charles T., Tuscaloosa, AL, August 29, 2023
- Appendix F66. Gulf Region Radiation Oncology Centers, Inc. and Lowrey, Gerald, M.D., Pensacola, FL, September 12, 2013
- Appendix F67. Connex Family Services LLC and Bianca Riddle, Warrenton, VA, September 15, 2023
- Appendix F68. Arora, M.D., Arun, Locust Valley, NY, September 20, 2023
- Appendix F69. BioTek reMEDys, Inc., AZBDBR, LLC d/b/a Avasa Rx Pharmacy, Valustar Pharmacy and Gadde, Chaitanya, New Castle, DE, September 29, 2023

Volume 6

Part III Appendixes (Continued)

Appendix F. Selected Recent OIG Negotiated Corporate Integrity Agreements (CIAs) with Health Care Providers and Other Entities as Part of the Settlement of Federal Health Care Program Investigations (Continued)

SUMMARY OF CONTENTS

- Appendix F70. Cardiac Imaging, Inc. and Samuel Rao Kancherlapalli, Carlsbad, CA, September 29, 2023
- Appendix F71. The Cigna Group, Bloomfield, CT, September 29, 2023
- Appendix F72. Paksn, Inc., Aakash, Inc. D/B/A Park Central Care & Rehabilitation Center, and Prema Thekkek, Vacaville, CA, November 9, 2023
- Appendix F73. CorePath Laboratories, PA, Houston, TX, December 18, 2023
- Appendix F74. Community Health Network, Inc., Indianapolis, IN, December 18, 2023
- Appendix F75. Edgewater Recovery Center, LLC, Morehead, KY, January 3, 2024
- Appendix F76. Columbus LTACH, LLC, d/b/a Silver Lake Hospital, Newark, NJ, January 12, 2024
- Appendix F77. Rao, M.D., Jayasree and Jayasree Rao, M.D., PA, San Antonio, TX, March 25, 2024
- Appendix F78. Renew Health Consulting Services, LLC, Crystal Solorzano and Chaim Kolodny, Monrovia, CA, April 11, 2024
- Appendix F79. RAPHA Healthcare Services, LLC and Sharon Raynes Halliday, Durham, NC, May 14, 2024
- Appendix F80. Cape Cod Hospital, West Yarmouth, MA, May 14, 2024
- Appendix F81. Bluestone Physician Services Southeast, LLC, Bluestone Physician Services, P.A., and Bluestone National, LLC, Stillwater, MN, May 29, 2024
- Appendix F82. Strauss Ventures, LLC D/B/A The Grand Healthcare System; Clearview Operating Co. LLC D/B/A The Grand Rehabilitation and Nursing at Queens; Grand Mohawk Valley LLC D/B/A The Grand Rehabilitation and Nursing at Mohawk; Barnwell Operations Associates LLC D/B/A The Grand Rehabilitation and Nursing at Barnwell; Grand South Point LLC D/B/A The Grand Rehabilitation and Nursing at South Point; Heritage Operating Associates LLC D/B/A The Grand Rehabilitation and Nursing at Utica; River Valley Operating Associates LLC D/B/A The Grand Rehabilitation and Nursing at River Valley; Chittenango Center LLC D/B/A The Grand Rehabilitation and Nursing at Chittenango; Grand Great Neck LLC D/B/A The Grand Rehabilitation and Nursing at Great Neck; Rome Center LLC D/B/A The Grand Rehabilitation and Nursing at Rome; Guilderland Operator LLC D/B/A The Grand Rehabilitation and Nursing at Guilderland; The Center for Rehabilitation and Healthcare at Dutchess, LLC D/B/A The Grand Rehabilitation and Nursing at Pawling; and Grand Batavia LLC D/B/A The Grand Rehabilitation and Nursing at Batavia, Valley Stream, NY, July 2, 2024
- Appendix F83. Vista Clinical Diagnostics, LLC; Access Dermopath, Inc.; and Advanced Clinical Laboratories, Inc., Clermont, FL, July 8, 2024
- Appendix F84. Rite Aid Corporation, Rite Aid Hdqtrs. Corp., Rite Aid of Connecticut, Inc., Rite Aid of Delaware, Inc., Rite Aid of Maryland, Inc., Rite Aid of Michigan, Inc., Rite Aid of New Hampshire, Inc., Rite Aid of New Jersey, Inc., Rite Aid of Ohio, Inc., Rite Aid of Pennsylvania, Inc., and Rite Aid of Virginia, Inc., Philadelphia, PA, July 9, 2024
- Appendix F85. Pain Center of Virginia, PLLC, and Waheed Baksh, M.D., Martinsburg, WV, July 31, 2024
- Appendix F86. Precision Toxicology, LLC D/B/A Precision Diagnostics, San Diego, CA, August 22, 2024
- Appendix F87. Daiya Healthcare and Dr. Bhupinder Walia, Bellevue, WA, October 21, 2024

- Appendix F88. Ethos Holding Corp., D/B/A Ethos Laboratories, Newport, KY, November 1, 2024
- Appendix F89. QOL Medical, LLC, and Frederick E. Cooper, Vero Beach, FL, November 1, 2024
- Appendix F90. Texas Spine and Neurosurgery Center, P.A. and Rajesh Bindal, M.D., Sugar Land, TX, November 1, 2024
- Appendix F91. Oroville Hospital, Oroville, CA, November 22, 2024
- Appendix F92. Southeastern Behavioral Healthcare Services, LLC, Lumberton, NC, November 22, 2024
- Appendix F93. McKinsey & Company, Inc. United States, Austin, TX, December 11, 2024
- Appendix F94. Independent Health Association, Buffalo, NY, December 13, 2024
- Appendix F95. Heart Clinic of Paris, P.A. and Dr. Arjumand Hashmi, Paris, TX, December 20, 2024
- Appendix F96. MMM Holdings, LLC, San Juan, PR, December 20, 2024
- Appendix F97. Physicians Toxicology Laboratory, LLC, Matthew Ryan Lund, Thomas C. Lund, and Lund Capital Group, LLC, Tampa, FL, December 30, 2024
- Appendix F98. Kabakibou, Kamal C., MD and Kamal C. Kabakibou, M.D., P.C. D/B/A The Center for Pain Management, Atlanta, GA, January 6, 2025
- Appendix F99. A&R Pharmacy Inc., United Diabetic Supply, Inc., Daniel Spivak and George Spivak, Jupiter, FL, March 24, 2025
- Appendix F100. Community Options, Inc. and Community Options of New York, Inc., Wayne, NJ, March 25, 2025
- Appendix F101. Fresno Community Hospital and Medical Center d/b/a Community Health System, Fresno, CA, May 7, 2025
- Appendix F102. American Health Foundation, Inc., American Health Foundation Management Corporation, American Health Foundation Montgomery, Inc. d/b/a Cheltenham Nursing and Rehabilitation Center, American Health Foundation Ohio, Inc. d/b/a The Sanctuary at Wilmington Place, and Samaritan Care Center and Villa, Dublin, OH, June 3, 2025
- Appendix F103. Moroun Nursing Center of Detroit LLC d/b/a Ambassador, A Villa Center, Father Murray Nursing and Rehabilitation Centre LLC d/b/a Father Murray, A Villa Center, Detroit Nursing Center LLC d/b/a Imperial, A Villa Center, Park Nursing Center of Taylor LLC d/b/a Regency, A Villa Center, Colonial Health Care Center LLC d/b/a St. Joseph's, A Villa Center, Westland Nursing and Rehabilitation Centre LLC d/b/a Westland, A Villa Center and Villa Financial Services LLC, and Villa Olympia Investment LLC, Lincolnwood, IL, June 13, 2025
- Appendix F104. Riverpark Operations, LLC and Avamere Group, LLC, Wilsonville, OR, June 30, 2025

Appendix G. OIG Cases Involving Civil Monetary Penalties and Affirmative Exclusions

- Appendix G1. 2019 Cases
- Appendix G2. 2020 Cases
- Appendix G3. 2021 cases
- Appendix G4. 2022 cases
- Appendix G5. 2023 cases
- Appendix G6. 2024 cases
- Appendix G7. 2025 cases

SUMMARY OF CONTENTS

Table of Laws and Rules

Index