Health Care Financial Transactions Manual Highlights – 2026-2

This new Edition to Health Care Financial Transactions Manual includes new and updated case law, enforcement actions, and guidance consisting of new content in the following areas:

- Oregon Health Authority issues final order under state's Health Care Market Oversight law relating to a proposed purchase of home health and home-based hospice operations. (see § 2:4);
- State court requires Public Health and Health Planning Council approval of hospital merger under state law. Matter of Refuah Helpline v. McDonald, 88 Misc.3d 1269(A), 2026 WL 1379282 (NY Sup. Ct. May 12, 2026) (§ 2:4);
- OIG issues Advisory Opinions relating to issues such as urgent care laboratories, surgical supply discounts, ownership transfer of a Medicare certified ambulatory surgical center, and dental services provider's proposal to provide free orthodontic treatment to one of its existing patients. (Appendix 4:94 to Appendix 4:109);
- Updated 2026 OIG Enforcement Actions and Exclusions. (Appendix 5:36);
- DOJ enters into settlement agreement with Cleveland Clinic relating to gender affirming care for minors. (§ 7:5);
- FTC announces agreement in principle with U.S. Anesthesia Partners Inc. to settle antitrust litigation relating to anesthesia services in Texas. (§ 20:39);
- FTC warns Tennessee legislators of potential harm to patients if it passes proposed legislation that would terminate a Certificate of Public Advantage (COPA) that provides state regulatory oversight for Ballad Health. (§ 20:39);
- FTC announces that it is requiring national nonprofit health system Ascension Health Alliance to divest several surgery center facilities to complete its proposed $3.9 billion acquisition of AmSurg LLC. (§ 20:39); and
- Recent DEA Controlled Substances Act civil settlements with health care entities (§ 20:81).