Program Agenda

PricewaterhouseCoopers has provided sponsorship in support of this program.

September 25–27, 2006
Renaissance Harborplace Hotel
Baltimore, MD

Topics include:

- Legal Ethics
- Stark
- Clinical Trial Billing
- Auditing and Monitoring
- Internal Investigations
- Fair Market Value
- Healthcare Fraud and the False Claims Act

Continuing Education Credits: AAPC • ACHE • AHIMA • MCLE/CLE • NASBA/CPE • HCCB/CHC
Details

Program Mission
The AHLA/HCCA Fraud & Compliance Forum will provide practical guidance on the pressing legal and compliance issues that have arisen in the last twelve months. For health lawyers, the program will highlight the most important legal developments in areas such as Stark, the False Claims Act, and the Anti-Kickback Statute. For compliance officers, the conference will cover important issues such as Part D compliance plans, compliance effectiveness, and fraud and abuse. The program’s uniqueness stems not only from the important content for health lawyers and compliance officers but also from the additional value of bringing together legal counsel and compliance officers in one educational arena. The networking and the opportunity synergistic advances in fraud and abuse compliance make this program an essential educational forum for both health lawyers and compliance officers.

Program Goals and Objectives
Participants at the AHLA/HCCA Fraud & Compliance Forum will…

- Gain a greater understanding of the full nature of the various regulations governing the delivery of healthcare (Stark, False Claims Act)
- Recognize emerging regulatory trends that will affect legal and compliance practice in healthcare
- Network with peers and learn about the challenges and risk areas faced by a wide variety of healthcare settings (Hospitals, DME Suppliers, Academic Medical Centers, Physician Practices, Long-Term Care Providers, Pharmaceutical Manufacturers)
- Recognize the common issues faced by compliance and legal professionals, the roles each play in ensuring compliance and ways in which they can effectively work together

Who Should Attend
- Health Law Attorneys
- Compliance Officers
- Billing and Coding Professionals
- Third-Party Billing Professionals
- Chief Executive Officers
- Chief Operating Officers
- Chief Technology Officers
- Chief Financial Officers
- Medical Directors
- Physicians
- Managed Care Professionals
- Medical Group Managers
- Data Managers
- Ethics Officers
- Health Insurance Executives
- Consultants
- Government Agency Employees
- Health Administration Faculty
- Risk Managers
- Pharmacists
- Quality Assurance Professionals
- Registered Nurses
- Long-Term Care Professionals
**MONDAY, SEPTEMBER 25**

1:00 – 5:15 PM  
Registration and Information

2:00 – 3:30 PM  
**Fraud and Abuse Primer (not repeated)**  
James G. Sheehan, Assistant United States Attorney, Eastern District of Pennsylvania  
- Fraud and abuse authorities governing referral relationships: anti-kickback issues, Stark self-referral prohibitions  
- Fraud and abuse authorities: Civil False Claims Act, Civil Money Penalties  
- OIG exclusion authorities

3:45 – 5:15 PM  
**Compliance 101 (not repeated)**  
Al Josephs, Senior Director Policies and Training, Tenet Healthcare Corporation  
Debbie Troklus, Assistant Vice President for Health Affairs/Compliance, University of Louisville  
Cheryl Wagonhurst, Foley & Lardner  
- Provides a basic framework for compliance programs  
- Seven elements of an effective compliance program  
- Techniques for smooth implementation

**Compliance 202 (not repeated)**  
Mart Arvin, Privacy Officer, University of Louisville  
John Falcetano, Chief Audit and Compliance Officer, University Health System of Eastern Carolina  
- Measuring effectiveness of policies and procedures, education and training, communication, auditing and monitoring, enforcement and discipline, and investigations, response and prevention  
- How do the OIG Draft Supplemental Compliance Program Guidance for Hospitals and the OIG-AHLA Board Educational Resource affect compliance program effectiveness?  
- An overview of the CMS effectiveness pilot project

5:15 – 6:15 PM  
Welcome Reception  
Sponsored by PricewaterhouseCoopers  
(attendees, speakers, registered spouses and guests welcome)

**TUESDAY, SEPTEMBER 26**

7:30 AM – 5:30 PM  
Registration and Information
103 Anatomy of an Advisory Opinion Request—
A Practical Guide
Marc D. Goldstone, Senior Counsel, Tenet Health System
- To opine or not to opine: Is your arrangement ripe for an opinion?
- Anatomy of a request: Effective opinion request drafting
- Colloquy—what's the give-and-take between the government and a requester like?
- To bind or not to bind—is OIG the final word?
- Offensive vs. defensive Advisory Opinions

104 Cultivating Physician Hospital Relationships:
A Legal Perspective
John Marren, Hogan Marren, Ltd
Mark B. Ponski, Director, Health Enterprise Growth Practice, Health Industries Advisory Group, PricewaterhouseCoopers LLP
- Overview of the healthcare landscape driving hospital/physician relationships
- Recent forms of ventures in response to this developing healthcare environment
- Key regulatory and operational issues in developing hospital/physician ventures

105 Hot Issues for Pharmaceutical Manufacturers
Elizabeth Carder-Thompson, Reed Smith LLP
Mark R. Fitzgerald, Powers Pyles Sutter & Verville PC
- Recent enforcement activity under the FDCA and civil False Claims Act regarding off-label promotion of pharmaceuticals
- What's the scope of appropriate medical science liaison activity on off-label uses?
- Latest compliance developments on integrating manufacturer patient assistance programs (PAPs) with Medicare Part D: “Inside” and “outside” Part D model PAPs, prospects for “institutional,” “coalition,” “clearinghouse” or other PAP models, OIG concerns vs congressional pressure, what the future may hold for manufacturer PAPs caught in the middle
- Developments on consulting agreements with physicians

2:00 – 3:00 PM

201 Part D, Long-Term Care and Fraud—Ten Months Later (not repeated)
Margaret Hutchinson, Assistant United States Attorney, Eastern District of PA
Harvey M. Tettlebaum, Husch & Eppenberger LLC
- Review of Part D in long-term care since January 1, 2006—pluses and minuses
- The government's enforcement current posture for PDPs, long-term care pharmacies and long-term care providers
- Fraud and abuse cases investigated and filed by the government and qui tam relators

202 What to Tell Your Client When It Discovers a Stark Violation
John T. Brennan, Jr, Crowell & Moring LLP
Patricia T. Meador, Kennedy Covington
Beth Schermer, Vice Dean for Administration, University of Arizona College of Medicine
- Advanced search methods for finding an “exception”
- Disclosure and repayment strategies and obligations
- Impact of recent legal developments, including the OIG Open Letter, on how to resolve Stark problems

203 Advanced Stark
S. Craig Holden, Ober Kaler Grimes & Shriver
Robert A. Wade, Baker & Daniels

204 Federal and State Administrative Sanctions
Gabriel L. Imperato, Broad & Cassel
Heidi A. Sorensen, Office of the Inspector General, U.S. Department of Health and Human Services
- The Carrier and Fiscal Intermediary sanctions, including pre-payment review, focused medical review, suspension of payment and referral for civil penalty and/or criminal fraud and abuse liability
- The authorities for mandatory and permissive exclusion under the Medicare program and termination under state Medicaid programs
- Important issues in administrative cases, including, but not limited to, application of the constitutional double jeopardy and excessive punishment prohibitions, as well as the scope and applicability and basis for mandatory and permissive exclusion

205 Ethical Leadership, Legal Ethics and Practical Reality: The Intersection of Ethics and Governance in Corporate Compliance
Andrew J. Demetriou, Fulbright & Jaworski LLP
William W. Horton, Haskell Slaughter Young & Rediker LLC
- Top-down compliance: the role of the board and management
- The lawyer's role in fostering a culture of compliance
- Ethical duties of the lawyer when the compliance program fails short
3:15 – 4:15 PM

**Concurrent Sessions 3**

**301 Legal Opinions, Fraud and Compliance: Taxing Challenges and Professional Responsibilities**
(Not repeated)
Alan S. Goldberg, Attorney & Counselor at Law
- The nature and nurture of legal opinions
- Circular 230
- Due diligence, policies, procedures, and mistakes
- Oversight and education
- Conflicts and consistency

**302 Key Fraud and Abuse Compliance Concerns for Academic Medical Centers**
(Not repeated)
Eric B. Gordon, McDermott Will & Emery LLP
Max M. Reynolds, Health System Counsel, University of California
- Ensuring compliance when making fund transfers between AMC components – why the AMC exception may not be your friend
- Structuring faculty compensation to promote productivity and compliance – special challenges for AMCs under Stark
- Addressing faculty relationships with hospital vendors and research sponsors – beyond the conflict of interest disclosure

**303 Inpatient Short Stays and Medical Necessity**
Dennis M. Barry, Vinson & Elkins LLP
John K. Dugan, Partner, Health Industries, PricewaterhouseCoopers LLP
David M. Ledbetter, Vice President, Ethics and Compliance, Banner Health
- Risk of having a “pattern” of charging governmental payors for medically unnecessary inpatient admissions, including New Jersey enforcement actions from several years ago
- Benchmarks
- Identification of where breakdowns occur

**304 Attorney-Client Privilege in Dealing with Compliance Issues**
Sean Martin, Vice President and Associate General Counsel, Amgen
Ryan Meade, Meade & Roach
- Differences between attorney-client privilege and the work product doctrine
- Advantages of retaining compliance consultants under privilege and how to maintain the privilege
- When external counsel should be retained

305 Lessons Learned from *U.S. vs Weinbaum*
David M. Deaton, O’Melveny & Myers LLP
Katherine A. Lauer, Latham & Watkins LLP
- Can noncompliance with a safe harbor or failure to ask for an advisory opinion amount to unlawful intent under the Anti-Kickback Statute?
- Can FMV be challenged even when relying on MGMA physician compensation and overhead data?
- What is community need, why does it matter, and how should it be documented?

306 (repeat 103) **Anatomy of an Advisory Opinion Request – A Practical Guide**
Marc D. Goldstone, Vicki L. Robinson

4:30 – 5:30 PM

**Concurrent Sessions 4**

**401 Compliance Challenges in the DME/HME Industry**
(Not repeated)
Cleaster Ewing, Vice President of Compliance, American HomePatient
William T. Mathias, Ober Kaler Grimes & Shriver
- Compliance and legal perspectives on challenges facing DME/HME industry
- New compliance challenges, including quality standards and accreditation, competitive bidding, transition from DMERCs to MACs
- Longstanding compliance challenges, such as appropriate documentation, physician orders and CMNs, NSC enrollment, pre and postpayment reviews, and traditional anti-kickback concerns

**402 Effective and Compliant Clinical Trial Billing: Case Study of a Large Academic Medical Center**
(Not repeated)
Maria E. Gonzalez Knavel, Foley & Lardner LLP
F. Lisa Murtha, Managing Director, Huron Consulting Group
- Recent cases and settlements from the OIG and DOJ related to clinical trial billing
- The requirements for performing a review of the NCD and LCDs and the process for reviewing Informed Consent Disclosure language and IND IDE related information
- Necessary process steps to allow research organizations and physician practices to segregate research charges and routine care charges

**403 Discounts—The Anti-Kickback Statute’s New Clothes**
Kevin G. McAnaney, Law Offices of Kevin McAnaney
- Bundled goods
- Discounts to middlemen
- Free goods
- Buy one, get one free
- Prebates
Program Agenda

404 When, Whether, and How to Make Repayments and Disclosures
John R. Hellow, Hooper Lundy & Bookman, Inc.
J. Steve Hinkle, Vice President and Chief Compliance Officer, Ardent Health Services
- The sources of Medicare provider, supplier and physician obligations to make repayments and disclosures
- Risks and benefits of disclosure
- Liability for a failure to disclose or repay

405 The Good, the Bad, and the Truly Ugly: Internal Compliance Issues, Their Outcomes, and the Legal/Ethical Issues that Arise During the Process
John N. Joseph, Post & Schell
David E. Matyas, Epstein Becker & Green PC
Jeffrey Williams, Pfizer, Inc.
- Legal and ethical issues that arise when compliance issues are identified and an internal investigation is initiated
- Hypothetical examples will be used to address the process for: an internal investigation; reporting issues to executive management and the board of directors; if subject to a CIA, reporting the issue to the OIG CIA monitor; deciding when and if to make a self-disclosure; taking corrective action and disciplinary action
- When conducting internal investigations, what role should legal counsel play and what protections do the attorney-client privilege and work product doctrine provide?

406 (repeat 202) What to Tell Your Client When It Discovers a Stark Violation
John T. Brennan, Jr. Patricia T. Meador, Beth Schermer

5:30 – 7:00 PM
Reception
Sponsored by PricewaterhouseCoopers
(attendees, faculty and registered spouses and guests are welcome)

WEDNESDAY, SEPTEMBER 27

7:30 AM – 3:45 PM
Registration and Information

7:30 – 8:30 AM
Continental Breakfast
Sponsored by PricewaterhouseCoopers
(attendees, speakers, registered spouses, and guests are welcome)

8:30 – 9:30 AM
CONCURRENT SESSIONS 5

501 Competition or Cooperation—Physician-Hospital Joint Ventures: What Compliance Officers Need to Know
Paul R. DeMuro, Latham & Watkins
R. Christopher Raphaely, Deputy General Counsel, Jefferson Health System, Inc.
- Joint ventures proliferating: who are the parties, how are they participating, and what are they contributing?
- The common joint venture opportunities today and the preferred structural considerations
- The major regulatory issues that compliance officers should be aware of in the context of joint ventures, including Medicare and Medicaid Anti-kick back and False Claims, Stark II self-referral, antitrust, tax-exemption and securities laws, and rules governing reimbursement and billing
- Recommendations for new joint ventures in an increasingly hostile regulatory climate and how compliance officers might help in restructuring them
- Translating the government's concerns about joint ventures into helpful practice pointers that minimize the risk of such ventures

502 Current Federal Enforcement Initiatives: Relationships between Medical Device, Equipment and Pharmaceutical Suppliers and Hospital/Physician Customers
Mark T. Bullock, Senior Vice President of Government and Legal Affairs, Mercy Health System
Jeffrey B. Miller, Chief Compliance Officer and Counsel, Synthes, Inc.
- Connecting the dots among equipment and device purchases, discounts and cost reports
- Strategies from hospital and manufacturer perspectives for assessing and addressing charitable donations, educational, research and other supplier grants
- Current topics and practical advice on approving and monitoring physician consulting and professional services arrangements

503 Governance, Roles, and Responsibilities of Internal Audit versus Compliance Department
Mark Ruppert, Director, Internal Audit, Cedars-Sinai Medical Center
- Decipher federal ambiguity about compliance auditing and monitoring
- Obtain the guidance on auditing and monitoring jointly developed by the Association of Healthcare Internal Auditors and the Health Care Compliance Association
- Learn how the AHIA and HCCA guidance affects your role as Compliance Officer, Chief Auditor, or your combined Chief Compliance/Audit role
504 **Stark and Anti-Kickback Enforcement Actions: Investigation and Settlement**  
Sara Kay Wheeler, Powell Goldstein LLP  
- Lessons learned from the Erlanger investigation and settlement  
- Provider cooperation with investigations  
- Operating a hospital and running a compliance program while under federal investigation

505 (repeat 303) **Inpatient Short Stays and Medical Necessity**  
Dennis M. Barry, John K. Dugan, David M. Ledbetter

506 (repeat 305) **Lessons Learned from U.S. vs Weinbaum**  
David M. Deaton, Katherine A. Lauer

**CONCURRENT SESSION 6**

601 **Current Fraud and Abuse Issues in Hospice and Home Health** (not repeated)  
John Camperlengo, Compliance Officer, Gentiva  
Deborah A. Randall, Arent Fox  
- Latest fraud issues in home health including OIG Advisory Op. 06-01  
- Medical directors in home health and hospice  
- Hospital-home health coordination and discharge concerns  
- Hospice case management, resource utilization and quality: a fraud concern?  
- Documenting the role of the physician and nurse practitioner in hospice  
- On-going issues in hospice care in nursing home and assisted living facilities  
- Lessons from the Odyssey $13 million FCA settlement

602 **Stark Exceptions and Anti-kickback Statute Safe Harbors for Arrangements Involving Electronic Prescribing and Electronic Health Records Technology** (not repeated)  
Peter M. Hoffman, Garfunkel Wild & Travis PC  
Lisa Ohrin, Centers for Medicare and Medicaid Services  
- Overview of the final Stark exceptions and Anti-kickback Statute safe harbors for arrangements involving electronic prescribing and electronic health records technology  
- Review of significant changes from the proposed rules  
- Impact of the final rules on proposed arrangements between physicians and health care providers regarding the implementation of health information technology

603 **Avoiding or Preventing Qui Tam Lawsuits**  
Ankur J. Goel, McDermott Will & Emery LLP  
Marc S. Raspanti, Miller Alfano & Raspanti PC  
- What really motivates employees, consultants and other individuals to become qui tam relators?  
- How to effectively communicate with complainants to prevent them from becoming qui tam relators  
- Systems to identify and respond to issues raised directly with business managers  
- How to effectively deal with a complainant who is wrong about a compliance allegation  
- Severance steps with former employees, including releases, interviews and follow up activity

604 **Healthcare Fraud and the False Claims Act: A Case Study**  
Latour Lafferty, Fowler White Boggs Banker PA  
Whitney Schmidt, Affirmative Civil Enforcement Coordinator, Assistant United States Attorney  
- An overview of the False Claims Act (FCA)  
- Application of the FCA to the healthcare industry: a case study  
- The benefits of proactive compliance efforts in responding to a government investigation

605 (repeat 405) **The Good, the Bad, and the Truly Ugly: Internal Compliance Issues, Their Outcomes, and the Legal/Ethical Issues that Arise During the Process**  
John N. Joseph, David E. Matyas, Jeffrey Williams

606 (repeat 102) **Fair Market Value Defenses in False Claims Act Litigation**  
David Hile, Gregory M. Luce

**CONCURRENT SESSION 7**

701 **Homecare v. Medshares: Materiality and Damages in Healthcare Fraud Cases** (not repeated)  
Patric Hooper, Hooper Lundy & Bookman, Inc.  
Robert McAlliffe, U.S. Department of Justice  
- What must the government prove to establish actual damages in healthcare false claims actions—e.g., is and should it be enough for the government to show that false costs were allegedly included in a cost report as was the case in *U.S. ex rel A+ Homecare v. Medshares Management*, 400 F. 3d 428 (6th Cir. 2005)?  
- When, if ever, are healthcare false claims and statements immaterial and thus non-actionable under current case law?  
- Is a healthcare claim false under the federal False Claims Act if reasonable minds may differ over the validity and appropriateness of the rule for claiming payment?

AGENDA CONTINUES ON PAGE 10
### Monday, September 25, 2006

<table>
<thead>
<tr>
<th>Time</th>
<th>Event</th>
</tr>
</thead>
<tbody>
<tr>
<td>1:00 – 5:15 PM</td>
<td>Registration and Information</td>
</tr>
<tr>
<td>2:00 – 3:30 PM</td>
<td>Fraud and Abuse Primer (not repeated) Sheehan</td>
</tr>
<tr>
<td>3:45 – 5:15 PM</td>
<td>Compliance 101 (not repeated) Josephs, Troklus, Wagonhurst</td>
</tr>
<tr>
<td></td>
<td>Compliance 202 (not repeated) Arvin, Falcetano</td>
</tr>
<tr>
<td>5:15 – 6:15 PM</td>
<td>Welcome Reception sponsored by PricewaterhouseCoopers (attendees, speakers, registered spouses and guests welcome)</td>
</tr>
</tbody>
</table>

### Tuesday, September 26

<table>
<thead>
<tr>
<th>Time</th>
<th>Event</th>
</tr>
</thead>
<tbody>
<tr>
<td>7:30 AM – 5:30 PM</td>
<td>Registration and Information</td>
</tr>
<tr>
<td>7:30 – 8:30 AM</td>
<td>Continental Breakfast sponsored by PricewaterhouseCoopers (attendees, speakers, registered spouses and guests welcome)</td>
</tr>
<tr>
<td>8:30 – 8:45 AM</td>
<td>Welcome and Introduction Belmont, Roach</td>
</tr>
<tr>
<td>8:45 – 9:30 AM</td>
<td>Keynote Address Christie (invited)</td>
</tr>
<tr>
<td>9:30 – 11:00 AM</td>
<td>Case Study</td>
</tr>
<tr>
<td>11:30 – 12:30 PM</td>
<td>Concurrent Sessions 1</td>
</tr>
<tr>
<td></td>
<td>101 Parallel Proceedings: Joint Civil and Criminal Prosecution of Healthcare Cases (not repeated) Evans, Nichols</td>
</tr>
<tr>
<td></td>
<td>102 Fair Market Value Defenses in False Claims Act Litigation Hile, Luce</td>
</tr>
<tr>
<td></td>
<td>103 Anatomy of an Advisory Opinion Request—A Practical Guide Goldstone, V. Robinson</td>
</tr>
<tr>
<td></td>
<td>104 Cultivating Physician Hospital Relationships: A Legal Perspective Marren, Ponski</td>
</tr>
<tr>
<td></td>
<td>105 Hot Issues for Pharmaceutical Manufacturers Carder-Thompson, Fitzgerald</td>
</tr>
<tr>
<td>12:30 – 1:50 PM</td>
<td>Lunch on your own or attend the Fraud and Abuse, Self-Referrals, and False Claims Practice Group Luncheon ($38 for members of the Fraud and Abuse PG/$43 for nonmembers of the Fraud and Abuse PG; limited attendance; pre-registration required; please see page 15)</td>
</tr>
<tr>
<td>2:00 – 3:00 PM</td>
<td>Concurrent Sessions 2</td>
</tr>
<tr>
<td></td>
<td>201 Part D, Long-Term Care and Fraud—Ten Months Later (not repeated) Hutchinson, Tettlebaum</td>
</tr>
<tr>
<td></td>
<td>202 What to Tell Your Client When It Discovers a Stark Violation, Brennan, Meador, Schermer</td>
</tr>
<tr>
<td></td>
<td>203 Advanced Stark Holden, Wade</td>
</tr>
<tr>
<td></td>
<td>204 Federal and State Administrative Sanctions Sorensen, Imperato</td>
</tr>
<tr>
<td></td>
<td>205 Ethical Leadership, Legal Ethics and Practical Reality: The Intersection of Ethics and Governance in Corporate Compliance Demetriou, Horton</td>
</tr>
<tr>
<td>3:15 – 4:15 PM</td>
<td>Concurrent Sessions 3</td>
</tr>
<tr>
<td></td>
<td>301 Legal Opinions, Fraud and Compliance: Taxing Challenges and Professional Responsibilities (not repeated) Goldberg</td>
</tr>
<tr>
<td></td>
<td>302 Key Fraud and Abuse Compliance Concerns for Academic Medical Centers (not repeated) Gordon, Reynolds</td>
</tr>
<tr>
<td></td>
<td>303 Inpatient Short Stays and Medical Necessity Barry, Dugan, Ledbetter</td>
</tr>
<tr>
<td></td>
<td>304 Attorney-Client Privilege in Dealing with Compliance Issues Martin, Meade</td>
</tr>
<tr>
<td></td>
<td>305 Lessons Learned from U.S. vs Weinbaum Deaton, Lauer</td>
</tr>
<tr>
<td>4:30 – 5:30 PM</td>
<td>Concurrent Sessions 4</td>
</tr>
<tr>
<td></td>
<td>401 Compliance Challenges in the DME/HME Industry (not repeated) Ewing, Mathias</td>
</tr>
<tr>
<td></td>
<td>402 Effective and Compliant Clinical Trial Billing: Case Study of a Large Academic Medical Center (not repeated) Gonzalez Knavel, Murtha</td>
</tr>
<tr>
<td></td>
<td>403 Discounts—The Anti-Kickback Statute’s New Clothes McNaney</td>
</tr>
<tr>
<td></td>
<td>404 When, Whether, and How to Make Repayments and Disclosures Hellow, Hinkle</td>
</tr>
<tr>
<td></td>
<td>405 The Good, the Bad, and the Truly Ugly: Internal Compliance Issues, Their Outcomes, and the Legal/Ethical Issues that Arise During the Process Joseph, Matyas, Williams</td>
</tr>
<tr>
<td></td>
<td>406 (repeat 202) What to Tell Your Client When It Discovers a Stark Violation Brennan, Meador, Schermer</td>
</tr>
<tr>
<td>5:30 – 7:00 PM</td>
<td>Reception sponsored by PricewaterhouseCoopers (attendees, faculty and registered spouses and guests are welcome)</td>
</tr>
</tbody>
</table>
### Program Agenda

#### Wednesday, September 27

<table>
<thead>
<tr>
<th>Time</th>
<th>Session</th>
</tr>
</thead>
<tbody>
<tr>
<td>7:00 AM – 3:45 PM</td>
<td>Registration and Information</td>
</tr>
<tr>
<td>7:30 – 8:30 AM</td>
<td>Continental Breakfast sponsored by PricewaterhouseCoopers (attendees, speakers, registered spouses and guests welcome)</td>
</tr>
</tbody>
</table>

**8:30 – 9:30 AM**

<table>
<thead>
<tr>
<th>Concurrent Session 5</th>
<th>Session</th>
</tr>
</thead>
<tbody>
<tr>
<td>501</td>
<td>501 Competition or Cooperation—Physician-Hospital Joint Ventures: What Compliance Officers Need to Know (not repeated) DeMuro, Raphaely</td>
</tr>
<tr>
<td>502</td>
<td>502 Current Federal Enforcement Initiatives (not repeated) Bullock, Miller</td>
</tr>
<tr>
<td>503</td>
<td>503 Governance, Roles, and Responsibilities of Internal Audit versus Compliance Department Ruppert</td>
</tr>
<tr>
<td>504</td>
<td>504 Stark and Anti-Kickback Enforcement Actions: Investigation and Settlement Maida, Wheeler</td>
</tr>
<tr>
<td>505</td>
<td>505 (repeat 303) Inpatient Short Stays and Medical Necessity Barry, Dugan, Ledbetter</td>
</tr>
<tr>
<td>506</td>
<td>506 (repeat 305) Lessons Learned from U.S. vs Weinbaum Deaton, Lauer</td>
</tr>
</tbody>
</table>

**9:45 – 10:45 AM**

<table>
<thead>
<tr>
<th>Concurrent Session 6</th>
<th>Session</th>
</tr>
</thead>
<tbody>
<tr>
<td>601</td>
<td>601 Current Fraud and Abuse Issues in Hospice and Home Health (not repeated) Camperlengo, Randall</td>
</tr>
<tr>
<td>602</td>
<td>602 Stark Exceptions and Anti-Kickback Statue Safe Harbors for Arrangements Involving Electronic Prescribing and Electronic Health Records Technology (not repeated) Hoffman, Ohrin</td>
</tr>
<tr>
<td>603</td>
<td>603 Avoiding or Preventing Qui Tam Lawsuits Goel, Raspanti</td>
</tr>
<tr>
<td>604</td>
<td>604 Healthcare Fraud and the False Claims Act: A Case Study Lafferty, Schmidt</td>
</tr>
<tr>
<td>605</td>
<td>605 (repeat 405) The Good, the Bad, and the Truly Ugly: Internal Compliance Issues, Their Outcomes, and the Legal/Ethical Issues that Arise During the Process Joseph, Matyas, Williams</td>
</tr>
<tr>
<td>606</td>
<td>606 (repeat 102) Fair Market Value Defenses in False Claims Act Litigation Hile, Luce</td>
</tr>
</tbody>
</table>

**11:00 AM – Noon**

<table>
<thead>
<tr>
<th>Concurrent Session 7</th>
<th>Session</th>
</tr>
</thead>
<tbody>
<tr>
<td>701</td>
<td>701 Homecare vs. Medshares: Materiality and Damages in Healthcare Fraud Cases (not repeated) Hooper, McAuliffe</td>
</tr>
<tr>
<td>702</td>
<td>702 Deficit Reduction Act (not repeated) Flood, Sheeder</td>
</tr>
<tr>
<td>703</td>
<td>703 Provider-Based and “Under Arrangements” Billing: Compliance Pitfalls Aaron, Ruskin</td>
</tr>
<tr>
<td>704</td>
<td>704 Quality of Care and the False Claims Act: Enforcement, Defense and Compliance Perspectives F. Robinson, Sheehan, Wagonhurst</td>
</tr>
<tr>
<td>705</td>
<td>705 (repeat 105) Hot Issues for Pharmaceutical Manufacturers Carder-Thompson, Fitzgerald</td>
</tr>
<tr>
<td>706</td>
<td>706 (repeat 203) Advanced Stark Holden, Wade</td>
</tr>
</tbody>
</table>

**Noon – 1:20 PM**

Lunch on your own or attend the HCCA Membership Luncheon (Open to all attendees. $30 for HCCA members, $35 for non-members. Pre-registration required, please see page 15)

**1:30 – 2:30 PM**

<table>
<thead>
<tr>
<th>Concurrent Session 8</th>
<th>Session</th>
</tr>
</thead>
<tbody>
<tr>
<td>801</td>
<td>801 (repeat 205) Ethical Leadership, Legal Ethics and Practical Reality: The Intersection of Ethics and Governance in Corporate Compliance Demetriou, Horton</td>
</tr>
<tr>
<td>802</td>
<td>802 (repeat 404) When, Whether, and How to Make Repayments and Disclosures Hellow, Hinkle</td>
</tr>
<tr>
<td>803</td>
<td>803 (repeat 504) Stark and Anti-Kickback Enforcement Actions: Investigation and Settlement Maida, Wheeler</td>
</tr>
<tr>
<td>804</td>
<td>804 (repeat 604) Healthcare Fraud and the False Claims Act: A Case Study Lafferty, Schmidt</td>
</tr>
<tr>
<td>805</td>
<td>805 (repeat 704) Quality of Care and the False Claims Act: Enforcement, Defense and Compliance Perspectives F. Robinson, Sheehan, Wagonhurst</td>
</tr>
<tr>
<td>806</td>
<td>806 (repeat 603) Avoiding or Preventing Qui Tam Lawsuits Goel, Raspanti</td>
</tr>
</tbody>
</table>

**2:45 – 3:45 PM**

<table>
<thead>
<tr>
<th>Concurrent Session 9</th>
<th>Session</th>
</tr>
</thead>
<tbody>
<tr>
<td>901</td>
<td>901 (repeat 104) Cultivating Physician Hospital Relationships: A Legal Perspective Marren, Ponski</td>
</tr>
<tr>
<td>902</td>
<td>902 (repeat 304) Attorney-Client Privilege in Dealing with Compliance Issues Martin, Meade</td>
</tr>
<tr>
<td>903</td>
<td>903 (repeat 403) Discounts—The Anti-Kickback Statute’s New Clothes McAnaney</td>
</tr>
<tr>
<td>904</td>
<td>904 (repeat 703) Provider-Based and “Under Arrangements” Billing: Compliance Pitfalls Aaron, Ruskin</td>
</tr>
<tr>
<td>905</td>
<td>905 (repeat 204) Federal and State Administrative Sanctions Sorensen, Imperato</td>
</tr>
<tr>
<td>906</td>
<td>906 (repeat 503) Governance, Roles, and Responsibilities of Internal Audit versus Compliance Department Ruppert</td>
</tr>
</tbody>
</table>
702 **Deficit Reduction Act** (not repeated)
Brian Flood, Inspector General, Department of Health and Human Services, State of Texas
Frank E. Sheeder, Brown McCarroll

- DRA's impact on Medicaid enforcement
- The new importance of a compliance program under the DRA
- Future implications of Medicaid regulation and enforcement by CMS, DHS-OIG, and the states

703 **Provider-Based and “Under Arrangements” Billing: Compliance Pitfalls**
Hugh E. Aaron, President, Healthcare Regulatory Advisors, Inc
Andrew D. Ruskin, Vinson & Elkins LLP

- Discussion of Medicare payment implications of choosing to bill as a provider-based entity or “under arrangements”
- Overview of Medicare provider-based criteria and “under arrangements” criteria
- Discussion of circumstances under which a hospital can bill under the outpatient fee schedule for services rendered in a joint venture partially owned by the hospital

704 **Quality of Care and the False Claims Act: Enforcement, Defense, and Compliance Perspectives**
Frederick Robinson, Fulbright & Jaworski LLP
James G. Sheehan, Assistant United States Attorney, Eastern District of Pennsylvania
Cheryl Wagonhurst, Foley & Lardner LLP

- In-depth review of case law relating to False Claims Act liability in quality of care cases including, implied certification, worthless service claims, off-label use of drugs and devices, substandard care and medically unnecessary services
- Enforcement issues—abuse and neglect, false records, failure in reporting adverse events, restraints, intentional misconduct and governance
- How to spot an issue and conduct an appropriate investigation, including the appropriate disclosure of a quality of care issue

705 **Hot Issues for Pharmaceutical Manufacturers**
Elizabeth Carder-Thompson, Mark R. Fitzgerald

706 **Advanced Stark**
S. Craig Holden, Robert A. Wade

12:00 noon – 1:20 PM
**Lunch on your own or attend the HCCA Membership Luncheon**
(Open to all attendees. $30 for HCCA members, $35 for non-members. Pre-registration required; please see page 15)

1:30 – 2:30 PM
**Concurrent Session 8**

801 **Ethical Leadership, Legal Ethics and Practical Reality: The Intersection of Ethics and Governance in Corporate Compliance**
Andrew J. Demetriou, William W. Horton

802 **When, Whether and How to Make Repayments and Disclosures**
John R. Hellow, J. Steve Hinkle

803 **Stark and Anti-Kickback Enforcement Actions: Investigation and Settlement**
Tony R. Maida, Sara Kay Wheeler

804 **Healthcare Fraud and the False Claims Act: A Case Study**
Latour Lafferty, Whitney Schmidt

805 **Quality of Care and the False Claims Act: Enforcement, Defense and Compliance Perspectives**
Frederick Robinson, James G. Sheehan, Cheryl Wagonhurst

806 **Preventing Qui Tam Lawsuits**
Ankur J. Goel, Marc S. Raspanti

2:45 – 3:45 PM
**Concurrent Session 9**

901 **Cultivating Physician Hospital Relationships: A Legal Perspective**
John P. Marren, Mark B. Ponski

902 **Attorney-Client Privilege in Dealing with Compliance Issues**
Sean Martin, Ryan Meade

903 **Discounts—The Anti-Kickback Statute’s New Clothes**
Kevin G. McAnaney

904 **Provider-Based and “Under Arrangements” Billing: Compliance Pitfalls**
Hugh E. Aaron, Andrew D. Ruskin

905 **Federal and State Administrative Sanctions**
Gabriel L. Imperato, Heidi A. Sorensen

906 **Governance, Roles, and Responsibilities of Internal Audit versus Compliance Department**
Mark Ruppert

Adjournment
CHC Examination Information

HCCB is offering the HCCB Certification Exam On-Site on Thursday, September 28, 2006, from 9:00–11:00 AM at Renaissance Harborplace Hotel. To sit for the exam you will need 20 HCCB CEUs.

Cost: $250 (HCCA members only)
Cost: $350 (non-member)

To Register: Click on the HCCB Fraud & Compliance Special Application link on the HCCA Web site: www.hcca-info.org. Submit the application and fee to the testing agency by the deadline of Thursday, August 31, 2006.

Questions: Contact the HCCB at hccb@hcca-info.org or call the HCCA office at (888) 580-8373.
Speakers

Planning Committee

Kimberly Brandt
Director, Office of Financial Management, Program Integrity Group
Centers for Medicare and Medicaid Services
Baltimore, MD

S. Craig Holden, Esq.
Ober Kaler Grimes & Shriver
Baltimore, MD

Jennifer M. O’Brien
Vice President, Corporate Compliance
Allina Hospitals & Clinics
Minneapolis, MN

James G. Sheehan, Esq.
Assistant United States Attorney
Eastern District of Pennsylvania
Philadelphia, PA

Debbie Troklus, CHC
Assistant Vice President for Health Affairs/Compliance
University of Louisville
Louisville, KY

Faculty

Hugh E. Aaron
President
Healthcare Regulatory Advisors, Inc.
Glen Allen, VA

Marti Arvin, JD, CHC, CPC
Privacy Officer
University of Louisville
Louisville, KY

Dennis M. Barry, Esq.
Vinson & Elkins LLP
Washington, DC

Elisabeth Belmont, Esq.
AHLA President-Elect
Corporate Counsel
MaineHealth
Portland, ME

John T. Brennan, Jr, Esq.
Crowell & Moring LLP
Washington, DC

Mark T. Bullock, Esq.
Senior Vice President of Government and Legal Affairs
Mercy Health System
Conshohocken, PA

John Camperlengo
Compliance Officer
Gentiva
Melville, NY

Elizabeth Carder-Thompson, Esq.
Reed Smith LLP
Washington, DC

Christopher J. Christie, Esq. (invited)
United States Attorney for the District of New Jersey
Newark, NJ

David M. Deaton, Esq.
O’Melveny & Myers LLP
Los Angeles, CA

Andrew J. Demetriou, Esq.
Fulbright & Jaworski LLP
Los Angeles, CA

Paul R. DeMuro, Esq.
Latham & Watkins
San Francisco, CA

John K. Dugan
Partner, Health Industries
PricewaterhouseCoopers LLP
Philadelphia, PA

Virginia B. Evans
Director, Forensics
KPMG LLP
Washington, DC

Cleaster Ewing
Vice President of Compliance
American HomePatient
Brentwood, TN

John Falcetano, CHC, CIA
Chief Audit and Compliance Officer
University Health System of Eastern Carolina
Greenville, NC

Mark R. Fitzgerald, Esq.
Powers Pyles Sutter & Verville PC
Washington DC

Brian Flood, Esq.
Inspector General, Department of Health and Human Services, State of Texas
Austin, TX

Ankur J. Goel, Esq.
McDermott Will & Emery LLP
Washington, DC

Alan S. Goldberg, Esq.
Attorney & Counselor at Law
Washington, DC

Marc D. Goldstone, Esq.
Senior Counsel
Tenet Health System
Fort Lauderdale, FL

Eric B. Gordon, Esq.
McDermott Will & Emery LLP
Los Angeles, CA

John R. Hellow, Esq.
Hooper Lundy & Bookman, Inc.
Los Angeles, CA

David Hile
Managing Director
FTI Consulting
Houston, TX

J. Steve Hinkle, JD
Vice President and Chief Compliance Officer
Ardent Health Services
Nashville, TN

Peter M. Hoffman, Esq.
Garfunkel Wild & Travis PC
Great Neck, NY

Patric Hooper, Esq.
Hooper Lundy & Bookman, Inc.
Los Angeles, CA

William W. Horton, Esq.
Haskell Slaughter Young & Rediker LLC
Birmingham, AL

Margaret Hutchinson, Esq.
Assistant United States Attorney
Eastern District of PA
Philadelphia, PA

Gabriel L. Imperato, Esq.
Broad & Cassel
Fort Lauderdale, FL
John N. Joseph, Esq.
Post & Schell
Philadelphia, PA

Al Josephs
Senior Director Policies and Training
Tenet Healthcare Corporation
Dallas, TX

Maria E. Gonzalez Knavel, Esq.
Foley & Lardner LLP
Milwaukee, WI

Latour Lafferty, Esq.
Fowler White Boggs Banker PA
Tampa, FL

Katherine A. Lauer, Esq.
Latham & Watkins LLP
San Diego, CA

David M. Ledbetter
Vice President, Ethics and Compliance
Banner Health
Chesterfield, MO

Gregory M. Luce, Esq.
Jones Day
Washington, DC

Tony R. Maida
Senior Counsel
Office of the Inspector General
U.S. Department of Health and Human Services
Washington, DC

John P. Marren, Esq.
Hogan Marren, Ltd
Chicago, IL

William T. Mathias, Esq.
Ober Kaler Grimes & Shriner
Baltimore, MD

Sean Martin, Esq.
Vice President and Associate General Counsel
Amgen
Thousand Oaks, CA

David E. Matyas, Esq.
Epstein Becker & Green PC
Washington, DC

Kevin G. McAnaney, Esq.
Law Offices of Kevin McAnaney
Washington, DC

Ryan Meade, Esq.
Meade & Roach
Chicago, IL

Robert McAuliffe
Civil Division, U.S. Department of Justice
Washington, DC

Patricia T. Meador, Esq.
Kennedy Covington
Research Triangle Park, NC

Jeffrey B. Miller
Chief Compliance Officer and Counsel
Synthes, Inc.
West Chester, PA

F. Lisa Murtha, JD, CHC
Managing Director
Huron Consulting Group
New York, NY

Roann Nichols, Esq.
Assistant United States Attorney of Maryland
Baltimore, MD

Lisa Ohrin, Esq.
Centers for Medicare and Medicaid Services
Baltimore, MD

Mark B. Ponski
Director, Health Enterprise Growth Practice,
Health Industries Advisory Group
PricewaterhouseCoopers LLP
Indianapolis, IN

Deborah A. Randall, Esq.
Arent Fox PLLC
Washington, DC

R. Christopher Raphaely, Esq.
Deputy General Counsel
Jefferson Health System, Inc.
Radnor, PA

Marc Raspanti, Esq.
Miller Alfano & Raspanti PC
Philadelphia, PA

Max M. Reynolds, Esq.
Health System Counsel
University of California
Oakland, CA

Daniel R. Roach
HCCA President
Vice President, Compliance and Audit
Catholic Healthcare West
San Francisco, CA

Frederick Robinson, Esq.
Fulbright & Jaworski LLP
Washington, DC

Vicki L. Robinson, Esq.
Office of the Inspector General
U.S. Department of Health and Human Services
Washington, DC

Mark Ruppert, CPA, CIA, CISA, CHFP
Director, Internal Audit
Cedars-Sinai Medical Center
Los Angeles, CA

Andrew D. Ruskin, Esq.
Vinson & Elkins LLP
Washington, DC

Beth Schermer, Esq.
Vice Dean for Administration
University of Arizona College of Medicine
Phoenix, AZ

Whitney Schmidt, Esq.
Affirmative Civil Enforcement Coordinator
Assistant United States Attorney
Tampa, FL

Frank E. Sheeder, Esq.
Brown McCarroll LLP
Dallas, TX

Heidi A. Sorensen, Esq.
Office of the Inspector General
U.S. Department of Health and Human Services
Washington, DC

Robert A. Wade, Esq.
Baker & Daniels LLP
South Bend, IN

Cheryl Wagonhurst, Esq.
Foley & Lardner LLP
Los Angeles, CA

Sara Kay Wheeler, Esq.
Powell Goldstein LLP
Atlanta, GA

Jeffrey Williams
Compliance Officer
Pfizer, Inc.
New York, NY
Program Information

Dates: September 25-27, 2006
Place: Renaissance Harborplace Hotel
202 East Pratt Street
Baltimore, MD 21202
(410) 547-1200
(800) 468-3571

Registration Fees:
Postmarked and paid by September 6, 2006
AHLA/HCCA Members: $820
AHLA/HCCA Member Group: $745*
Non-Members: $1,020

Postmarked and paid after September 6, 2006
AHLA/HCCA Members: $920
AHLA/HCCA Member Group: $845*
Non-Member: $1,160

*When an AHLA or HCCA member registers for this program, each additional AHLA or HCCA member registered from his/her organization at the same time is eligible for a discounted registration fee.

Discounted Registration Fees: Government employees, academicians and students, please call for discounted registration fees.

Spouse/Guest Fee: For an additional $30, spouses and adult guests can register to attend the Sunday and Monday receptions and the continental breakfasts on Monday and Tuesday. Please sign up on the registration form. Children are welcome at these events at no additional charges.

Hotel Reservations: Hotel accommodations are not included in the registration fee. Call the Renaissance Harborplace Hotel (410) 547-1200. To be eligible for the group rate, reservations must be received by Wednesday, September 6, 2006. Rooms are limited and may sell out prior to the cut-off date. Please make your reservations early!

Cancellations/Substitutions: Cancellations must be in writing and must be received no later than Friday, September 15. Refunds will not be issued for cancellations received after this date. Registrations, less a $125 administrative fee, will be refunded following the program. If you wish to send a substitute, please call the Member Service Center at (202) 833-0766. Please note that the registration fee will be based on the membership status of the person who actually attends the program.

Airline Reservations: AHLA and HCCA have selected Association Travel Concepts (ATC) as the official event travel agency.

Airline Discounts: Up to 15% off applicable classes of service for tickets purchased more than 30 days prior to the meeting. Restrictions apply. (United). Up to 5% off applicable classes of service for tickets purchased prior to the meeting. (American Airlines). ATC will also search for the lowest available fare on any airline. Direct access to ATC online booking tools and live agents for discounted meeting travel. Go to www.atcmeetings.com and click on MEETINGS to Air – Meetings and Leisure (TravelASP). When you register using the online booking tool please enter AHLA in the Company or Organization or Association field.

Car Discounts: Discounted meeting rates (Avis & Enterprise).

Reservations: Make your reservation from one of the following options:
• Web: www.atcmeetings.com
• Email: reservations@atcmeetings.com
• Fax: (888) 362-3153

ATC is available for reservations from 9:00 am until 7:30 pm Eastern Time, Monday through Friday. Some restrictions may apply. Service fees apply.

Special Needs: If you need any of the auxiliary aids or services identified in the Americans with disabilities Act, Please call the Member Service Center at (202) 833-0766.

AHLA Membership: Non-members wishing to join AHLA for one full year can do so by adding $200 to the member registration fee. Members receive monthly mailings and discounts on AHLA publications and programs.

HCCA Membership: Non-members wishing to join HCCA for one full year can do so by adding $200 to the member conference registration fee. Members receive monthly mailings and discounts on HCCA publications and programs.

Continuing Education Credits

CLE: Participants will be given continuing education request forms at the program. Forms must be completed and returned to Health Lawyers staff in order to receive credit. American Health Lawyers Association is an approved sponsor of continuing legal education credits in most states. This seminar will be worth approximately 13.5 continuing legal education credits based on a 60-minute hour and 16.2 credits based on a 50-minute hour. There is one hour of ethics.

CPE: AHLA is registered with the National Association of State Boards of Accountancy (NASBA) as a sponsor of continuing professional education on the National Registry of CPE Sponsors. State boards of accountancy have final authority on the acceptance of individual courses for CPE credit. Complaints regarding registered sponsors may be addressed to the National Registry of CPE Sponsors, 150 Fourth Avenue North, Nashville, TN 37219-2417. A maximum of 17.0 credits based on a 50-minute hour will be granted. Recommended experience level for this course is intermediate to advanced. No prerequisites or advance requirements exist for this activity. This is a group live activity. For more information regarding administrative policies such as complaint or refund, call the HCCA at (888) 580-8373.

ACHE: Medical Education Collaborative (MEC) is authorized to award 14.0 hours of pre-approved Category II (non-ACHE) continuing education credit for this program toward advancement or recertification in the American College of Healthcare Executives. Participants in this program wishing to have the continuing education hours applied toward Category II credit should list their attendance when applying for advancement or recertification in ACHE.

AHIMA: This program is pending prior approval CE Credits for use in fulfilling the continuing education requirements of the American Health Information Management Association (AHIMA).

HCCB: This program has been approved for 17.1 HCCB continuing education credits for compliance certification.

CCEP: A maximum of 17.1 CCEP CEUs may be earned for compliance certification.
**Fraud & Compliance Forum 2006**

Remit payment and completed registration form by mail to:
American Health Lawyers Association, P.O. Box 79340, Baltimore, MD 21279-0340

You may also fax with credit card information to (202) 775-2482, or register via phone by calling (202) 833-0766.

If this program is over-subscribed, only AHLA and HCCA members will be placed on a waiting list. On-site registrations will be accepted on a space-available basis only.

Name: ____________________________  AHLA/HCCA ID #: ____________________________
First Name for Badge (if different than above): ____________________________
Title: ____________________________  Organization: ____________________________
Address: ____________________________________________________________
City: ____________________________  State: ____________________________  ZIP+ 4: ____________________________
Telephone: ____________________________  Fax: ____________________________  E-Mail: ____________________________
Spouse/Guest Name: ____________________________

<table>
<thead>
<tr>
<th>Payment Information</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Early Registration Fees (faxed/postmarked and paid on or before September 6, 2006)</td>
<td></td>
</tr>
<tr>
<td>AHLA or HCCA Members:</td>
<td>☐ $820</td>
</tr>
<tr>
<td>Additional Members*:</td>
<td>☐ $745</td>
</tr>
<tr>
<td>Registration Fees (faxed/postmarked and paid after September 6, 2006)</td>
<td></td>
</tr>
<tr>
<td>AHLA or HCCA Members:</td>
<td>☐ $920</td>
</tr>
<tr>
<td>Additional Members*:</td>
<td>☐ $845</td>
</tr>
</tbody>
</table>

*Concurrent registrations by same organization/firm at the same time.

Please note: Should your credit card total be miscalculated, AHLA/HCCA will charge your card for the correct amount due. To receive a refund of the registration fee paid minus $125, cancellation notice must be received in writing by September 15, 2006.

CODE: AHLA06 1

**Session Selection:** Please indicate below which sessions you plan to attend.

<table>
<thead>
<tr>
<th>Monday, September 25</th>
<th>Tuesday, September 26</th>
<th>Wednesday, September 27</th>
</tr>
</thead>
<tbody>
<tr>
<td>2:00 – 3:30 pm</td>
<td>Fraud and Abuse Primer</td>
<td>11:30am – 12:30pm</td>
</tr>
<tr>
<td>3:45 – 5:15 pm</td>
<td>Compliance 101</td>
<td>2:00 – 3:00pm</td>
</tr>
<tr>
<td></td>
<td>Compliance 202</td>
<td>2:00 – 4:15pm</td>
</tr>
<tr>
<td></td>
<td></td>
<td>3:15 – 4:15pm</td>
</tr>
<tr>
<td></td>
<td></td>
<td>3:01</td>
</tr>
<tr>
<td></td>
<td></td>
<td>3:02</td>
</tr>
<tr>
<td></td>
<td></td>
<td>3:03</td>
</tr>
<tr>
<td></td>
<td></td>
<td>3:04</td>
</tr>
<tr>
<td></td>
<td></td>
<td>3:05</td>
</tr>
<tr>
<td></td>
<td></td>
<td>3:06</td>
</tr>
</tbody>
</table>

This information will be used in planning. You will not be obligated to attend the sessions you select.
Fraud & Compliance Forum

Register by September 6 and save!

September 25–27, 2006
Renaissance Harborplace Hotel
Baltimore, MD

PricewaterhouseCoopers has provided sponsorship in support of this program.

Continuing Education Credits: AAPC • ACHE • AHIMA • MCLE/CLE • NASBA/CPE • HCCB/CHC