

Headwinds in Laboratory and Pathology Practice

Opportunities Ahead

Overview

- Audits are coming!
- How Low is Too Low: Medicaid, Medicare and Most Favored Nation
- OIG New Compliance Program Guidance
- Digital Pathology: Key Trends; TC/PC Arrangements
- Special Arrangements = Problematic & Creative
 - OIG Advisory Opinion 23-06
 - Multi-specialty Groups
- Current Events
- Open Q&A

Audits are Coming!

- HRSA opened the door
- Impromptu Laboratory Inspections
- Payer Inspections: COVID and Beyond
- “RAC” Auditors
- OIG Requests and Investigations
- Whistleblowers at-large

How Low is Too Low: Medicaid, Medicare and Most Favored Nation

- Always been a factor
- What was Medicare factor became Medicaid problem
- State level Medicaid challenges from Medicaid programs and state attorneys general
- Medicare usual and customary statute
- Most favored nation language in payer contracts
- How to manage?

OIG New Compliance Program Guidance

- General Compliance Program Guidance
- Broad Foundational Guidance
- Industry Specific Program Guidance
- Seven Elements
- Adaptions for Small and Large Entities
- Private Equity
- Quality and Patient Safety

Digital Pathology

- Key Trends
- Regulatory Update
- TC/PC Arrangements

Special Arrangements

- OIG Advisory Opinion 23-06
- Payment Plans for Patients Who Claim Hardship
- DRG and APC payments for TC = What is TC?
- OON = Can You Do Whatever You Want?
- Package Price Services
- Multi-specialty Group Practices

Open Q&A