

To: Hospitals and Health Systems *and* Fraud and Abuse
Practice Group Members

From: Hospitals and Health Systems *and* Fraud and Abuse
Practice Group Leaderships

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**Fourteenth Settlement Under Stark Self-Referral Disclosure
Protocol**

By John Garver, III, and Jennifer Hutchens*

On November 6, the Centers for Medicare & Medicaid Services (CMS) announced its fourteenth settlement under the Voluntary Self-Referral Disclosure Protocol (SRDP). This settlement involved violations of the federal physician self-referral statute (commonly known as the Stark Law) by a California hospital (Hospital). The Hospital disclosed under the SRDP that it violated the Stark Law by not satisfying the requirements of the physician recruitment exception. The Hospital's violations were settled for \$28,000. CMS provides a [list](#) of "select" self-disclosures resolved under the SRDP, including this settlement.

**We would like to thank John B. Garver, III, Esquire, and Jennifer C. Hutchens, Esquire (Robinson Bradshaw & Hinson PA, Charlotte, NC), for providing this email alert. We would also like to thank the Hospitals and Health Systems Practice Group leadership for sharing this alert with the Fraud and Abuse Practice Group.*

Member benefit educational opportunity:

Participate in [Part I](#) of the accountable care organizations bootcamp webinar series: organizing the ACO (tomorrow, November 13).

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