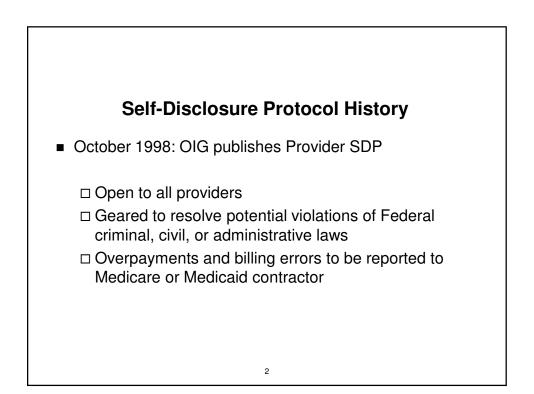
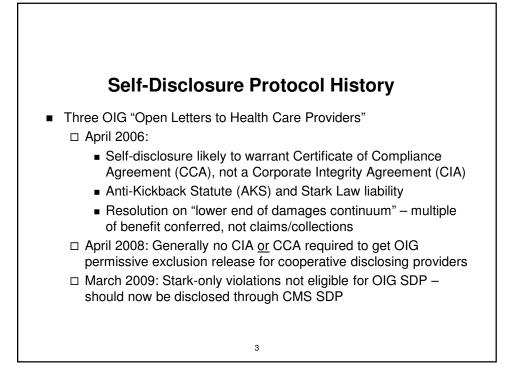
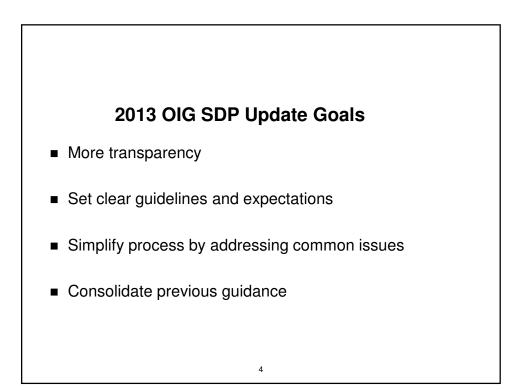


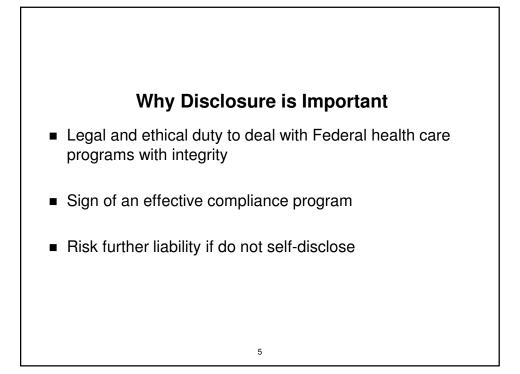
John W. O'Brien Senior Counsel Office of Counsel to the Inspector General U.S. Department of Health and Human Services john.obrien@oig.hhs.gov

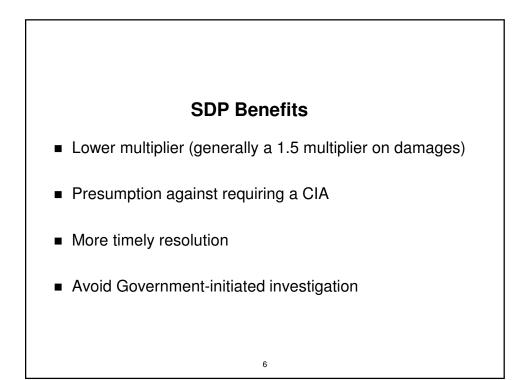
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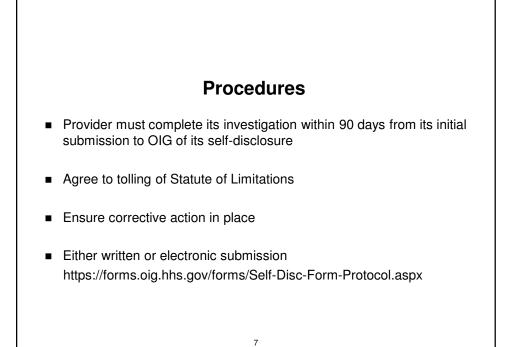


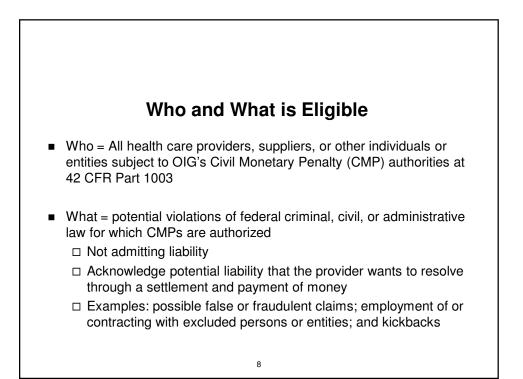


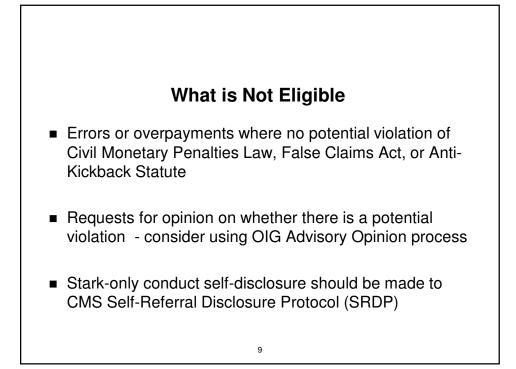


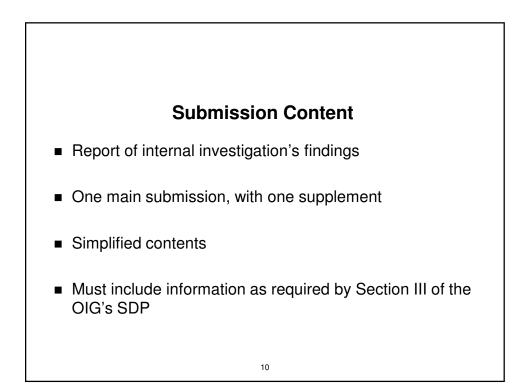


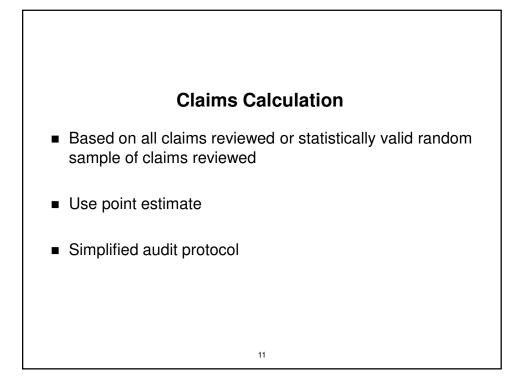


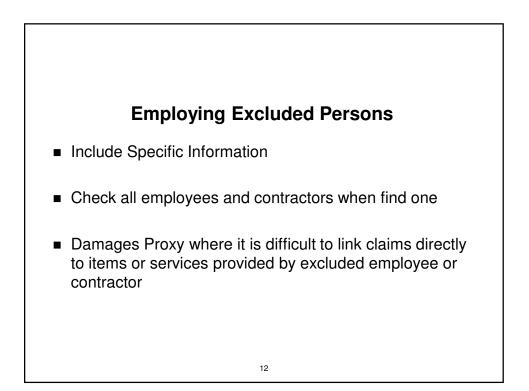












AKS and Stark

- Arrangement-by-arrangement analysis
- AKS or AKS and Stark = OIG SDP
- Stark only = CMS SRDP
- Explain why potential violation
- See common issues list in Section III.D of OIG SDP
- Include amount of remuneration and amount of claim-based damages

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