

## DEADLINE LOOMING FOR NURSING FACILITY COMPLIANCE PROGRAM REQUIREMENT

The Patient Protection and Affordable Care Act (PPACA) requires all skilled nursing facilities (SNFs) and nursing facilities (NFs) to have an effective compliance and ethics program in place by March 23, 2013. Unfortunately, the Centers for Medicare & Medicaid Services (CMS) has failed to publish final regulations covering these programs, as required under PPACA, by March 2012.

Despite the lack of regulations, facilities are encouraged to meet the deadline by developing and implementing compliance and ethics programs on their own. The Office of the Inspector General (OIG) has previously released guidelines for SNF/NF compliance and ethics programs. These guidelines can be found in the Federal Register ([original](#) and [revised in 2008](#)) as well as recent OIG Work Plans ([2013](#) and [2012](#)).

Should you have any questions, please contact:

Todd Selby at 317.977.1440 or [tselby@hallrender.com](mailto:tselby@hallrender.com);  
Brian Jent at 317.977.1402 or [bjent@hallrender.com](mailto:bjent@hallrender.com); or  
David Bufford at 502.568.9368 or [dbufford@hallrender.com](mailto:dbufford@hallrender.com),  
or your regular Hall Render attorney.