

Join us for CORPORATE COMPLIANCE & ETHICS WEEK



COMPLIANCE CONNECTION *Newsletter*

NOVEMBER 2026

This newsletter is prepared monthly by the Midland Health Compliance Department and is intended to provide relevant compliance issues and hot topics.

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**Corporate Compliance & Ethics Week:
November 1-7, 2026**

**Midland Health PolicyTech: Policy #371
Materials Management Purchasing Code
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FRAUD & ABUSE LAWS

The five most important Federal Fraud and Abuse Laws that apply to physicians are:

- 1. False Claims Act (FCA):** The civil FCA protects the Government from being overcharged or sold shoddy goods or services. It is illegal to submit claims for payment to Medicare or Medicaid that you know or should know are false or fraudulent.
- 2. Anti-Kickback Statute (AKS):** The AKS is a criminal law that prohibits the knowing and willful payment of "remuneration" to induce or reward patient referrals or the generation of business involving any item or service payable by the Federal health care programs (e.g., drugs, supplies, or health care services for Medicare or Medicaid patients).
- 3. Physician Self-Referral Law (Stark law):** The Physician Self-Referral Law, commonly referred to as the Stark law, prohibits physicians from referring patients to receive "designated health services" payable by Medicare or Medicaid from entities with which the physician or an immediate family member has a financial relationship, unless an exception applies.
- 4. Exclusion Statute:** OIG is legally required to exclude from participation in all Federal health care programs individuals and entities convicted of the following types of criminal offenses: (1) Medicare or Medicaid fraud; (2) patient abuse or neglect; (3) felony convictions for other health-care-related fraud, theft, or other financial misconduct; and (4) felony convictions for unlawful manufacture, distribution, prescription, or dispensing of controlled substances.
- 5. Civil Monetary Penalties Law (CMPL):** OIG may seek civil monetary penalties and sometimes exclusion for a wide variety of conduct and is authorized to seek different amounts of penalties and assessments based on the type of violation at issue. Penalties range from \$10,000 to \$50,000 per violation.

Resource:

<https://oig.hhs.gov/compliance/physician-education/fraud-abuse-laws/>



MIDLAND HEALTH

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November 1-7, 2026



Corporate Compliance & Ethics Week® began in 2005 to shine a spotlight on the importance of compliance and ethics. The core principles of the week are awareness, recognition, and reinforcement. The "official" Corporate Compliance & Ethics Week Was first observed in 2005 as an event that could assist members of the Society of Corporate Compliance and Ethics (SCCE) and the Health Care Compliance Association (HCCA) with the need to educate staff on the importance of compliance and ethics.

But the event's roots actually go back to 2002, when two HCCA members, Gene DeLaddy and Cheryl Atkinson, wrote an article for Compliance Today telling others about an awareness program at their facility. That event was called Compliance Awareness Week, and it was celebrated at the Carolinas HealthCare System in Charlotte, North Carolina. The first National Corporate Compliance and Ethics Week was launched May 22-28, 2005. SCCE and HCCA have always co-sponsored the event.

Corporate Compliance & Ethics Week offers a great opportunity to shine a spotlight on the importance of compliance and ethics at your organization. By having a designated week, you and your compliance staff can build awareness in ways that reinforce not just specific rules and regulations, but an overall culture of compliance. Using the "hook" of Corporate Compliance & Ethics Week, you can emphasize your overall message in several different ways.

The importance of employee education is emphasized by the U.S. Federal Sentencing Guidelines' seven elements of an effective compliance and ethics program. The education element requires that steps be taken so all employees know and understand the compliance and ethics standards that they are expected to meet. With a week-long celebration of compliance and ethics, you have a great opportunity to introduce and reinforce your chosen themes. Your plans will rely in part on your organization's specific needs, but some basic goals may include:

- **Awareness** of the Code of Conduct, relevant laws/regulations, hotlines and other reporting methods, the organization's compliance and ethics staff, etc.
- **Recognition** of training completion, compliance and ethics successes, etc.
- **Reinforcement** to demonstrate that all levels of the organization support a culture of compliance and ethics.

Resource:

<https://assets.corporatecompliance.org/Portals/1/PDF/Resources/CCEW/2018-ccew-why-celebrate.pdf?ver=2018-02-22-103752-953>



SCCE®
Society of Corporate
Compliance and Ethics



HCCA®
Health Care Compliance
Association

MIDLAND HEALTH Compliance HOTLINE

855•662•SAFE (7233)

ID#: 6874433130

ID# is required to submit a report.

You can make your report or concern ANONYMOUSLY.





Materials Management Purchasing Code of Ethics Gifts and Gratuities

Purpose: Identify the overall purpose and scope of the Purchasing Code of Ethics, to include guidelines for accepting gifts and gratuities.

1. Give first consideration to the objectives and policies of the institution.
2. Strive to obtain the maximum value for each dollar of expenditure.
3. Decline personal gifts and gratuities.
4. Grant all competitive suppliers equal consideration insofar as state or federal statute and institutional policy permit.
5. Conduct business with potential and current suppliers in an atmosphere of good faith, devoid of intentional misrepresentation.
6. Demand honesty in sales representation whether offered through the medium of a verbal or written statement, an advertisement, or a sample of the product.
7. Accord a prompt and courteous reception insofar as conditions permit to all who call on legitimate business missions.
8. Cooperate with trade, industrial and professional associations and governmental and private agencies for the purposes of promoting and developing sound business methods.
9. Foster fair, ethical and legal trade practices.

Strive for standardization to reduce cost and further the development of products and methods that reflect high quality, safety and effectiveness of care.

No employee shall accept gifts, personal loans, entertainment or other special considerations from vendors the Hospital is currently doing business with or prejudice the hospital's reputation. Gifts of nominal value may be acceptable on special occasions (such as holidays or significant Hospital milestone events) and must be evaluated and approved by the Director of Materials Management on a case-by-case basis.

Association with supplier representatives at business organization meetings is helpful in establishing better business understanding and is neither questionable nor unethical, provided the employee keeps himself free of obligations.

[Read entire Policy:](#)

Midland Health PolicyTech #371

"Materials Management Purchasing Code of Ethics Gifts and Gratuities"

Midland Health PolicyTech Instructions

Click this link located on the Midland Health intranet "Policies"

<https://midland.policytech.com/dotNet/noAuth/login.aspx?ReturnUrl=%2f>

the
pulse



MIDLAND HEALTH

CERNER **POLICIES** NEWS RESOURCES DAYFORCE OFFICE365 DEPARTMENT PHONE LIST

IN OTHER COMPLIANCE NEWS

LINK 1

**Labcorp Settles
Multistate Data Breach
Investigation for \$2.3
Million**

<https://www.hipaajournal.com/abcpr-multistate-settlement-amca/>

LINK 2

**Ambry Genetics Pays
\$700,000 Penalty to
Settle HIPAA Violations**

<https://www.hipaajournal.com/ambry-genetics-hipaa-penalty/>

LINK 3

**Texas Hospice
Management Company
Data Breach Affects
35,000 Texas Residents**

<https://www.hipaajournal.com/ngmar-management-services-data-breach/>

LINK 4

**Astrana Health Notifies
SEC About Social
Engineering Incident**

<https://www.hipaajournal.com/astrana-health-data-breach/>

Skilled Nursing Company and Executives Agree to Pay \$1 Million to Resolve Overbilling Allegations

BOSTON – Skilled nursing facilities (SNFs) operated by RegalCare Management Group, LLC and RegalCare Management 2.0 (together RegalCare), along with two RegalCare executives, have agreed to pay \$1 million to resolve allegations that RegalCare submitted, and the executives caused to be submitted, claims to Medicare and Massachusetts Medicaid for skilled nursing rehabilitation therapy services that were medically unreasonable and unnecessary.

Regal Care, along with owner Eliyahu Mirlis and executive, Hector Caraballo, have agreed to collectively pay \$1 million to resolve allegations made in a February 2025 False Claims Act (FCA) complaint filed in the federal court in the District of Massachusetts.

SNFs are inpatient facilities that provide transitional care to patients following a 72-hour or more hospital stay. Federal healthcare programs, including Medicare and Medicaid, reimburse providers for medically reasonable and necessary services rendered to SNF patients. The FCA prohibits individuals or entities from submitting, or causing the submission of, false claims for payment to, and false statements material to claims for payment from, the respective programs.

RegalCare operates SNFs in Massachusetts and previously in Connecticut. In February 2025, the United States, along with the Commonwealth of Massachusetts, filed a complaint in federal court in the District of Massachusetts against Regalcare, Mirlis, Caraballo, and another, alleging that the defendants inflated the SNFs' claims to Medicare and Medicaid.

As part of the settlement agreement, RegalCare, Mirlis, and Caraballo admitted to the following facts. At various times between 2018 and 2023, RegalCare submitted claims to Medicare and Massachusetts Medicaid (MassHealth) for skilled nursing rehabilitation therapy services that were medically unreasonable and unnecessary. At the direction of Caraballo and Mirlis, RegalCare submitted claims that were not supported by individual patient need. At various times, Caraballo modified SNF records to support the submission of Ultra High RUG claims to Medicare, and without assessing or speaking to the patients, or even consulting with clinicians. Mirlis also directed RegalCare's billing company to submit claims for patients before the patients' assessment forms were even finalized in the billing system.

Read entire article:

<https://www.justice.gov/usao-ma/pr/skilled-nursing-company-and-executive-agree-pay-1-million-resolve-overbilling>

NOVEMBER 2026

Health Observances Calendar

NOV 1-7	National Diabetes Education Week
NOV 9	National Diabetes Heart Connection Day
NOV 8-14	National Nurse Practitioner Week
NOV 8-14	National Radiologic Technology Week
NOV 11	CTEPH Awareness Day
NOV 12	World Pneumonia Day
NOV 14	World Diabetes Day
NOV 17	World Prematurity Day
NOV 19	Great American Smokeout
NOV 22-28	Gastroesophageal Reflux Disease (GERD) Awareness Week
NOV 26	National Family Health History Day



<https://b2b.healthgrades.com/insights/blog/2026-health-observances-calendar/>



**Do you have a
hot topic or interesting
COMPLIANCE NEWS to report?**

**If so, please email an article
or news link to:**

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