

# LONG TERM CARE AND THE LAW

February 21-23, 2011 • Manchester Grand Hyatt • San Diego, CA



AMERICAN  
**HEALTH LAWYERS**  
ASSOCIATION

## Program Planning Committee:

Alan E. Schabes, Esq. – Program Chair

David S. Cade, Esq.

Dianne J. De La Mare

Kimber L. Latsha, Esq.

Christopher C. Puri, Esq.

In association with:



*PointRight Inc. and Upstairs Solutions have provided sponsorship in support of this program.*

## Program Agenda

**Please Note:** This year's program includes sessions for Nursing Facility, Assisted Living and Home Health audiences. The Program at a Glance on pages 14-17 indicates for which audience(s) a session is intended: Nursing Facility (NF) attendees; Assisted Living (AL) attendees; and/or Home Health (HH) attendees.

### Monday, February 21, 2011

8:00 am - 5:30 pm

#### Registration and Information

8:30 am - 12:45 pm

#### Assisted Living In-House General Counsel Roundtable, sponsored by NCAL.

To RSVP, contact Shane Osborne at [sosborne@ncal.org](mailto:sosborne@ncal.org) or sign up on the registration form. (Open only to in-house counsel. Attendance is limited and pre-registration is required.)

- » CNA claims study
- » Assisted living liability and risks
- » When outside counsel works best
- » Peer-to-peer sharing of current risks and risk management strategies
- » Managing risks with third party contractors

### CONCURRENT SESSIONS

9:30-11:30 am

#### I. Nursing Facility Introductory Session

*Richard J. Brockman*  
*Kenneth L. Burgess*

- » Medicare and Medicaid – how they are different and how they are alike
- » Introduction of the types of providers – long term care, senior housing (independent living and assisted living facilities)
- » In-home care, rehabilitation hospitals and hospice
- » Characteristics of the clients each would serve
- » Reimbursement sources for each type of provider
- » Regulatory and tort issues that may arise for each type of provider
- » Contracting with vendors and other healthcare entities
- » Fraud and abuse

#### II. Assisted Living Introductory Session

*Joel S. Goldman*  
*Martha Everett Meng*

- » What is assisted living
- » The regulatory landscape
- » Ownership/management structures

- » Payment/Medicaid Waivers
- » Risk management issues
- » Special considerations for dementia care
- » Impact of Disability Discrimination laws

#### III. Home Health and Hospice Introductory Session

*William A. Dombi*

- » What is home care and hospice
- » Who provides home care and hospice
- » What are the standards for qualifying as a provider
- » How is it paid for under Medicare/Medicaid, managed care, commercial insurance and private pay
- » Standards for coverage of home care and hospice
- » Legal issues involved in business transactions, quality of care, claims payment and fraud and abuse

9:30-11:30 am

#### Interactive Discussion Groups

Attendance for each discussion group is limited to 30 people; there is an additional charge of \$40; and pre-registration is required. Please see page 19 to register

#### Group 1: A Conversation on Fraud Enforcement

*Lisa Re*  
*Mark E. Reagan*

- » Lynchpins for OIG investigations
- » Issues of individual and corporate liability
- » Failures of care and false claims act culpability
- » Audits, evaluations and the OIG Work Plan
- » Transparency and other issues arising from the ACA

#### Group 2: Counsel for Home Health and Hospice

(open to In-House Counsel and Corporate General Counsel)  
*John N. Camperlengo*

- » An active dialogue of best practices and strategies to address issues facing counsel for home health providers
- » Legal issues faced by the audience that may include regulatory enforcement, legislative developments and more

#### Group 3: Hot Healthcare Issues Facing the Long Term Care Industry in 2011 (open only to In-House Counsel)

*Annaliese Impink*  
*Susan Thomas Whittle*

- » Staffing after the Skilled Healthcare decision
  - Dissection of the issue in the case
  - Proactive measures to avoid similar decisions in California
  - Similar cases in other states around the country (i.e., staffing as a major component of Colorado malpractice cases)

## Program Agenda

- » Healthcare reform
  - Navigating the maze with the new Compliance Program provisions and how to avoid a corporate integrity agreement (CIA) approach to compliance
  - Elder Justice Act issues. What does the Act require? How to be compliant with the provisions today without guiding regulation
- » Arbitration
  - State by state comparison, through participant discussion, of where arbitration stands today
  - Is pre-emption recognized in your state? (i.e., Texas vs. Illinois)
  - What are state judges doing with arbitration agreements?
- » Survey and enforcement
  - Anatomy of a Termination Action
  - What is driving these actions?
  - Is one CMS Regional office more aggressive than another?
  - Where does CMS Baltimore fit in this mix?

11:30 am-1:00 pm

**Lunch on your own**

### GENERAL SESSION

1:00-1:15 pm

#### Welcome and Introduction

*Barbara J. Duffy, Chair of the Long Term Care, Senior Housing, In-Home Care and Rehabilitation Practice Group*  
*Gerald M. Griffith, AHLA President-Elect*  
*Alan E. Schabes, Program Chair*

1:15-2:00 pm

#### Keynote Address

*Michael Hash (invited)*

2:00-3:30 pm

#### CEO Panel: The Future of Long Term Care and State of Health Reform

*Alan E. Schabes (Moderator)*  
*Howie Groff*  
*Timothy L. Lukenda*  
*Richard Schutt*  
*Tony Strange*

3:30- 4:00 pm

**Coffee Break sponsored by PointRight Inc. and Upstairs Solutions**

### CONCURRENT SESSIONS

4:00-5:30 pm

- A. Compliance Program Realities within the Homecare Business Operations** (not repeated)  
*John N. Camperlengo*  
*Jeff Shaner*
  - » Importance of conducting an internal RAC audit/risk assessment
  - » HITECH and electronic information challenges
  - » Structuring internal reviews of home health agencies
  - » Compliance issues with referral source portals
  - » Intermediary audits
- B. Case Law Update**  
*Jeffery Cusic*  
*James F. Segroves*
  - » Medicare and Medicaid reimbursement
  - » Survey, certification and enforcement
  - » Home health
  - » False claims litigation
  - » General litigation developments
- C. Legislative and Regulatory Update for All Providers of Long Term Care, Services and Supports**  
*Marsha R. Greenfield*  
*Carol Rolf*
  - » The Healthcare Reform legislation passed in 2010 (“Patient Protection and Affordable Care Act” or PPACA) has made many changes that will fundamentally affect all providers of long term care, services and supports (LTSS)
  - » Opportunities and challenges confronting LTSS providers and beneficiaries over the next decades as a result of PPACA and other legislative and regulatory initiatives
  - » Provisions in PPACA and other major legislation, both passed and proposed, affecting LTSS providers, such as the Fairness in Nursing Home Arbitration Act and proposed legislation on nursing home survey and certification
  - » CMS’s proposed regulations implementing health reform and the Act
  - » CMS Program Letters and rules
  - » Five Star, DEA issues and other LTSS issues
- D. Legislative and Regulatory Update for Assisted Living**  
*Maribeth Bersani*  
*David A. Kylo*  
*Karl P. Polzer*
  - » Federal legislative and regulatory activity that could impact senior living providers and residents

## Program Agenda

- » National senior living studies, surveys and research expected within the next few years
- » New study of Medicaid coverage and payment issues in assisted living
- » State legislative and regulatory trends

### E. Federal Healthcare Reform: Updates and New Initiatives

*James F. Miles*

- » Potential changes to Medicare/Medicaid reimbursement including payment bundling and value-based purchasing
- » Probable features of mandatory compliance programs
- » Initiatives that may substantially impact transactions, including certification / enrollment and mergers / acquisitions
- » CMS rule-making efforts related to PPACA and other federal legislation

5:30–6:30 pm

**Reception sponsored by PointRight Inc. and Upstairs Solutions** (attendees, speakers, children, registered spouses and guests welcome)

## Tuesday, February 22, 2011

7:00 am–5:35 pm

**Registration and Information**

7:00–8:30 am

**Continental Breakfast sponsored PointRight Inc. and Upstairs Solutions** (attendees, speakers, children, registered spouses and guests welcome)

### CONCURRENT SESSIONS

*Please note start times for the following sessions*

8:00–9:30 am Extended Sessions

### F. Legislative and Regulatory Update for Home Health and Hospice (not repeated)

*William A. Dombi*

*Jonathan Keyserling*

- » The Affordable Care Act and its impact on home care and hospice
- » Medicare payment rate changes in 2011
- » New Medicare home health and hospice coverage and documentation requirements
- » New program integrity rules affecting home healthcare and hospice providers
- » Changes to Medicare rules affecting sales and acquisitions of home health agencies
- » Developments in the oversight of home care and hospice under Medicare and Medicaid

### B. Case Law Update (repeat)

### E. Federal Healthcare Reform: Updates and New Initiatives (repeat)

8:30–9:30 am

### G. The Fair Housing Act, ADA Reasonable Accommodation and Assisted Living and Senior Housing

*Robin Dale*

- » Recent FHA/ADA Reasonable Accommodation cases impacting senior housing providers
- » Tips to help avoid FHA/ADA challenges and implement policies and procedures that reduce risk and still meet operational goals
- » Hot topics, including admission agreements, transfer between levels of care, and safety rules affecting use of motorized carts and walkers
- » Disability, religious, sexual orientation, and other areas of concern and how they apply to customs and practices in the industry
- » Fair housing rules in the context of daily operational challenges faced by assisted living, independent living and CCRC providers
- » Sample policies and admission agreements addressing FHA issues

### H. Drugs in Long Term Care: What's the Problem?

*James S. Mathis*

*Barbara L. Miltenberger*

- » Regulatory compliance
- » DAB cases involving medications – hot spots for survey issues and potential liability
- » DEA requirements for controlled substances and possible solutions
- » Information from the pharmacy (which can improve patient care)
- » Information to the Pharmacy (which results in delayed medication)
  - Prescriptions/completeness of orders
  - Refill information
  - Release/access to on-site medication (e-kit or contingency supply)
  - Information to resolve prior authorization rejections
- » Information to the Pharmacy (which results in billing)
  - Census (Part A vs. Part D or Medicaid)
  - Hospice medication coverage
- » Part D fraud and abuse issues

## Program Agenda

9:45-10:45 am

### J. To Code or Not to Code – Considerations and Consequences at the End of Life (not repeated)

*Alan C. Horowitz*

*Donna J. Senft*

- » Clinical care standards including recent changes for administering CPR and determining when CPR would be inappropriate despite full code status
- » Legal requirements related to administering or withholding CPR and potential conflicts between federal and state laws regulating healthcare facilities and state professional practice acts
- » Distinctions between guidance provided through advance directives or living wills and determination of code status
- » Implications for failing to have systems in place to identify resident wishes, properly document code status and ensure staff understands and follows company policies and standards of care

### K. Distress Facility Transaction Case Study: Legal, Regulatory and Financial Issues (not repeated)

*Gavin J. Gadberry*

*Christopher C. Puri*

- » When a facility is distressed and how to know it
- » If enforcement action or termination is imminent: Don't Panic
- » Injunction junction: What stage is the facility in the process? Is there still time?
- » Change of ownership when termination is threatened
- » Seller/buyer and lessor/lessee due diligence issues for distressed facility transactions
- » Life after termination: Reasonable assurance period and new enrollment after PPACA

### L. The Law Department and Compliance Function after Healthcare Reform: Best Practices for Long Term Care Providers in Investigations, Oversight and Dealing with Executives and the Board

*Caroline Berdzik*

*William H. Jordan*

*Peter C. November*

- » What long term care companies should be considering after ACA in terms of the organization of the Law Department and the Compliance Department?
- » How to handle board reporting, investigations and complaints in a heightened enforcement environment?
- » Best practices for organization and structure, conducting investigations, use of outside counsel, reporting to executives and the board, and implementation of

training and processes to deal with ACA's mandatory overpayment requirement and expected compliance guidance from HHS

- » Examples from in-house counsel of hospice, home health, LTAC and SNF companies

### M. The Hottest Labor and Employment Law Issues Impacting Long Term Care

*John E. Lyncheski*

*Mark E. Tabakman*

- » Current and emerging issues in labor and employment law affecting long term care facilities
- » Recent labor and employment decisions by the Supreme Court and other federal courts most relevant to long term care employers
- » Changes at the administrative level which impact long term care
- » Significant NLRB rulings and their effect on long term care employers
- » The impact of the new, union-friendly NLRB
- » Update on union activity and organizing tactics involving long term care employers
- » The danger of personal liability for healthcare supervisors and managers
- » Challenges in the application of the FMLA and ADA for long term care facilities
- » Employment and termination issues unique to the healthcare industry
- » Who is and who is not a supervisor and the implications

### N. SNF/NF Survey and Enforcement Update

*Jeannie A. Adams*

*Janet K. Feldkamp*

- » Major legislative and regulatory developments affecting SNF/NFs including an emphasis on regulatory developments arising from the Patient Protection and Affordable Care Act, and up to date information on status of various regulatory initiatives, including proposed enforcement regulations and required compliance plan guidance and activity
- » Key survey and certification letters, transmittals, GAO reports and OIG activity on such issues as Special Focus Facilities and the OIG work plan
- » Recent changes in interpretive guidelines found in Appendix PP and Chapter 7 of the State Operations Manual for surveys of Medicare and Medicaid certified SNF/NFs
- » Recent ALJ and DAB decisions as well as federal court decisions addressing survey and certification issues

## Program Agenda

11:00 am- 12:00 noon

**O. Ancillary Services in Assisted Living: Regulatory, Compliance and Contractual Issues** (not repeated)

*Paul A. Gordon*

*Bonnie H. Krisztal*

- » Issues and practical approaches to manage risk in the relationship between assisted living providers and ancillary service providers such as therapy, pharmacy, home health, hospice providers and private duty attendants
- » Fraud and abuse implications, including possible application of anti-kickback laws and duplicate payment issues and explore options to reduce the risk of a fraud and abuse allegation
- » Safe harbors regarding space rental, service contracts, investments and other arrangements that can insulate providers from liability

**P. Legal Issues Regarding Innovative Home Care Delivery Models** (not repeated)

*Gresham Bayne*

*James C. Pyles*

- » Why is the United States the last industrialized country to understand that healthcare in the home is “the future of healthcare”?
- » Since there will be no new money for healthcare, where will we find the money for investments in HIT and other new technologies?
- » If the rising cost of healthcare is the number one threat to the country's fiscal stability, why does only 1 out of 400 provisions in the health reform legislation require a specific level of savings?
- » What are the legal issues that prevent the US from reducing healthcare costs and how can they be addressed?
- » Tube thoracostomy in the home: Ten ways I could have been sued for malpractice
- » Independence at home: New ways to avoid Stark reprisals and other kickbacks
- » Getting the EMR bonus payments: Will I need a lawyer?
- » Being in the auditors bullseye

**Q. Behavioral Issues and Involuntary Discharges**

*David E. Jose*

- » Regulatory requirements and limitations
- » Sources of support and resistance
- » Importance of documentation
- » Employee claims – exposure and support
- » Presenting the case
- » Opportunities for performance improvement

**R. MDS 3.0 and the Thin Line between Love and Hate**

*Marie C. Infante*

*Steven B. Littlehale*

- » MDS 3.0 as a risk management tool and corporate compliance imperative
- » Identify data, protocols and legal strategies to respond to potential opportunistic uses of MDS 3.0 data and outcomes by the government and other interests
- » Systems and internal controls to maintain data integrity and compliance with MDS 3.0 procedural and submission requirements

**S. Medicare and Medicaid Reimbursement for Post Acute Care Providers under National Health Reform**

*Joel M. Hamme*

*Sheila Lambowitz*

- » Medicare reimbursement provisions and rate adjustments for post acute care providers
- » Medicare post acute payment bundling
- » The implications of the Independent Payment Advisory Board for Medicare post acute care providers
- » Therapy caps, MDS 3.0 and RUGs IV
- » Healthcare acquired conditions and impact on Medicaid rates
- » Federal Medicaid matching percentage issues

12:00 noon-1:30 pm

**Lunch on your own or attend the Long Term Care, Senior Housing, In-Home Care and Rehabilitation Practice Group Luncheon** (additional fee; limited attendance; pre-registration required; see page 19)

### CONCURRENT SESSIONS

1:45-2:45 pm

**T. Nurse Delegation in Long Term Care and Assisted Living: Getting It Right so You Do No Wrong** (not repeated)

*Robert J. Lightfoot, III*

- » Role of nurses in SNFs and the expanding role of RNs in assisted living
- » Scope of RN duties that are subject to and part of Nurse Delegation
- » Which nursing tasks and functions may be delegated to unlicensed care staff
- » Elements of Nurse Delegation pursuant to national and state standards of practice

## Program Agenda

- » How best to legally protect both the RN, the care staff and the facility when an RN is delegating to unlicensed care staff
  - » Steps to take when the unlicensed staff being delegated to makes a mistake
- U. Legal Issues Relating to Marketing of Homecare and Hospice** (not repeated)  
*Deborah A. Randall*
- » Education versus improper incentives
  - » Marketers approaching nursing facilities, ALFs and hospitals
  - » Bridge programs for palliative care and hospice
  - » “Preferred” provider relationships versus steering “continuous” care as a marketing incentive to hospice admission
  - » Medical directors as marketers in homecare and hospice
- V. Legal Ethics: Issues in Investigations and Multiple Party Representations**  
*Michael H. Cook*  
*Richard E. Gardner III*
- » Ethical issues that arise for counsel involved in internal investigations
  - » Identifying the client – who do you really represent and is there a conflict anywhere
  - » Obligations to non-clients – interactions with employees and other parties
- W. Opportunities and Challenges in Financing Long Term Care Facilities through HUD: Perspective of Borrower’s Counsel and a Lender**  
*Paul A. Lang*  
*Kassem K. Matt*
- » HUD insured financing of long term care facilities, including HUD’s LEAN processing program
  - » Advantages and disadvantages of HUD insured financing of long term care facilities
  - » HUD’s new accounts receivable financing policy for long term care facilities, including HUD’s inter-creditor agreement and deposit account control agreement
  - » Legal opinion issues
- R. MDS 3.0 and the Thin Line between Love and Hate** (repeat)
- 3:00-4:00 pm
- X. Adjudicating DAB Appeals – A Discussion with DHHS Counsel** (not repeated)  
*Ari J. Markenson*  
*Richard L. Routman (invited)*
- » Timely dismissal of appeals
  - » New issues raised by DHHS counsel in the pre-hearing brief
  - » Proper appeal requests and amendments and disclosure requirements in ALJ orders
  - » The federal and state QA privilege and its effect on disclosure in the appeals process
  - » Records altered after the survey and the attorney-client privilege
  - » Surveyors being subject to deposition in a parallel proceeding
  - » Settlement agreements and creative settlement terms
  - » TROs, expedited hearings and their effect on the DAB process
- Y. Buying and Selling Skilled Nursing and Assisted Living Facilities** (not repeated)  
*Thomas D. Vaughn*
- » New developments in buying and selling skilled nursing facilities and assisted living facilities
  - » Licensure and certificate of need issues
  - » Medicare and Medicaid certification and enrollment issues
  - » Transparency requirements under healthcare reform
  - » Successor liability for the buyer
  - » Impact of limitations on certification of new providers
- Z. Hot Topics in Hospice and Homecare Litigation** (not repeated)  
*Brian M. Daucher*  
*Mark Reagan*
- » Challenging Medicaid rates, benefits and wages in the homecare area
  - » Strategic considerations for litigating in federal and state courts in homecare cases
  - » Challenging unlawful regulation – the Hospice Cap Cases
  - » Related lessons about PRRB practice: EJR and group appeals
  - » Equitable tolling and provider appeals under 1395oo(a)(3)

## Program Agenda

### AA. Developing an Effective Compliance Program for the Small Provider

*Tamar Abell*

*David R. Hoffman*

- » Healthcare reform bill as it relates to mandatory corporate compliance and other mandates affecting long term care providers
- » Latest enforcement initiatives, including civil and criminal cases prosecuted and the OIG work plan, related to the small provider and quality of care
- » Corporate Integrity Agreements entered into by small providers and how small providers developed an effective plan to meet these requirements
- » Strategies for developing an effective compliance plan in a facility/small chain with limited resources

### M. The Hottest Labor and Employment Law Issues Impacting Long Term Care (repeat)

*Please note the end times for the following sessions*

4:15-5:15 pm

### BB. Home Health Transactions in the Era of the 36 Month Rule (not repeated)

*Brent Hill*

- » Strategies for buyers and sellers of home health agencies
- » The effect of the 36 Month Rule on the formation, capitalization and organization of new home health companies
- » Legal considerations for lenders and investors
- » Projection of long term effects of the 36 Month Rule

### CC. Medicaid Rate Litigation Update (not repeated)

*Barbara J. Duffy*

*Malcolm J. Harkins III*

- » Medicaid rate challenges for nursing facilities
- » Challenges to Medicaid ratemaking using the Supremacy Clause and other legal theories
- » Strategies to maximize the chances of success in obtaining preliminary injunctive relief in Medicaid rate cases
- » Attack of claims by States that they met their obligation to conduct a “reasonably principled analysis” of access and quality

### DD. Tax and Legal Issues for Not-For-Profit Long Term Care Providers and Their For-Profit Managers and Partners (not repeated)

*Michael D. Brent*

*Herman B. Rosenthal*

- » Not for profit requirements, including bond financing rules
- » Unique issues for not for profit providers contracting with for profit entities

- » Joint ventures between not for profit providers contracting with for profit entities
- » IRS and Congressional developments involving not for profit providers, particularly continuing care retirement communities

4:15-5:45 pm Extended Sessions

### C. Legislative and Regulatory Update for all Providers of Long Term Care, Services and Supports (repeat)

### D. Legislative and Regulatory Update for Assisted Living (repeat)

5:15-6:30 pm

Reception sponsored by PointRight Inc. and Upstairs Solutions (attendees, speakers, children and registered spouses and guests welcome)

## Wednesday, February 23, 2011

7:30 am-3:10 pm

Registration and Information

7:30-8:30 am

Continental Breakfast sponsored by PointRight Inc. and Upstairs Solutions (attendees, speakers, children, registered spouses and guests welcome)

8:30-9:30 am

### EE. Legal Ethics: “Don’t Ask - Don’t Tell”: Attorney-Client Privilege, Work Product and Confidences (not repeated)

*Joanne R. Lax*

- » Elements of the attorney-client privilege, particularly regarding corporate clients
- » Attorney work product doctrine
- » Professional ethical obligations to respect client confidences and secrets
- » Hypothetical case involving a long term care provider through small group discussion

### FF. PPACA’s New Anti-Fraud Initiatives Targeting Long Term Care Providers/Compliance Issues in Transparency and Disclosure (not repeated)

*Stephen J. Maag*

*Francis J. Serbaroli*

- » How will transparency and disclosure provisions for skilled nursing facilities contained in the PPACA impact providers
- » How transparency and disclosure provisions are impacting assisted living communities and continuing care retirement communities

## Program Agenda

- » The reform law's anti-fraud provisions and initiatives as they relate specifically to long term care facilities
  - » What long term care providers can expect in the way of new audits, investigations and potential liabilities from federal, state and private contractor (e.g. RAC) scrutiny
- GG. Event Reporting and Risk Management** (not repeated)  
*Theodore A. Sheffield*  
*Kirstin B. Sumner*
- » Response options to resident falls, elopements and other adverse events
  - » Self-reporting options for adverse events
  - » Internal investigations of adverse events
  - » Media and public relations considerations
- H. Drugs in Long Term Care: What's the Problem?** (repeat)
- N. SNF/NF Survey and Enforcement Update** (repeat)
- 9:40-10:40 am
- HH. Regulatory Issues: Responding to Surveys and Adverse Events, Utilizing the Appeal Process** (not repeated)  
*Theodore E. Mack*  
*Thomas Walsh III*
- » Survey process and plan of correction (POC)
  - » Quality assurance systems
  - » Extraordinary licensure actions
    - Emergency orders
    - Provisional licenses
    - Moratorium on admissions
    - License revocation or non-renewal
  - » Informal dispute resolution (IDR)
  - » Administrative appeal process
  - » Effect on civil liability claims
- JJ. Program Issues: CLASS and Elder Justice** (not repeated)  
*Kathy Greenlee*
- KK. Home Health and Hospice Relationships with Long Term Care Facilities: Avoiding Common Compliance Mistakes** (not repeated)  
*Robert Wayne Markette, Jr.*
- » Primary federal laws that can impact home health/hospice relationships with facilities
  - » OIG guidance on nursing home and home health/hospice relationships
  - » Common risk areas in home health/hospice relationships with facilities who refer and strategies for avoiding these problems
- » What are joint ventures and what risks do they present for providers
  - » How to protect your clients when they are approached by facilities with joint venture offers
- V. Legal Ethics: Issues in Investigations and Multiple Party Representations** (repeat)
- AA. Developing an Effective Compliance Program for the Small Provider** (repeat)
- 10:50-11:50 am
- LL. Operational and Regulatory Issues in CCRCs** (not repeated)  
*John J. Durso*
- » Practical and legal issues for CCRCs in economic downturn including review of forbearance agreements, affiliation, private sales, public sales and bankruptcy
  - » CCRCs - Resident contracts, risks associated with resident refunds, Resident Disclosure Statements and other state licensure or regulatory issues
  - » Review of GAO Report on CCRCs and response of industry "best practices" and "transparency policies"
  - » Tax issues facing CCRCs, real estate taxes, Hyatt IRS ruling and the Mission Ridge ruling
  - » Legal and practical implications of traditional tax exempt capital sources as well as non-traditional sources such as REITs and private equity and how they may be used to finance new projects, monetize operations and bridge periods of limited liquidity
- MM. Home Care Audits and Claims Denials: Dealing with Medicare and Medicaid Claims Denials from ZPICs to RACs to Appeals** (not repeated)  
*Denise Bonn*
- » ZPICs – what are they and what is their home care focus?
  - » RACs – Medicare- background and issues status; Medicaid – what to expect in 2011
  - » Appeals – rebuttal, recoupment, appeals strategy, challenging extrapolation, coverage issues

## Program Agenda

### **NN. Crisis Management Planning – Communication and Beyond** (not repeated)

*Rebecca Adelman  
Elizabeth P. Tyler*

- » Crisis events becoming increasingly common as state attorneys general and Department of Public Health surveyors increase their oversight of nursing facilities
- » How, during a crisis event, facility management must be prepared to respond promptly and effectively manage the facilities
- » How health facility attorneys must be prepared to assist their clients in mitigating risks and liabilities which may include wage and hour issues, workers compensation matters, healthcare regulatory responsibilities, landlord-tenant obligations and criminal liability
- » Health facility attorneys must also advise their clients with regard to the management of human and financial resources and the mitigation of media negativity during and after a crisis event
- » Initial and on-going issues that are presented as a result of crisis events, as well as the immediate responses to these crises, the appropriate on-going responses as the crisis develops as well as the required final self-assessments and post-crisis management once the crisis passes
- » Crisis Communication Plans, checklists and other practical information for preparing a plan for your company including the definition of a “crisis” in the healthcare setting, types of situations where a plan is necessary and the general content of a crisis communication plan
- » Effective Crisis Communications Plan including: The elements of a plan, managing families in the crisis and a discussion about admission of fault or apologies
- » Impact of poor crisis communication plans vs. comprehensive crisis communication plans including fewer claims/lawsuits, maintaining public confidence/integrity and enhanced relationships with families

### **OO. Employer Compliance with Healthcare Reform: The Statutory and Regulatory Framework**

*Nancy E. Taylor*

- » Varying effective dates
- » Expanded benefits, including required preventive care without cost-sharing
- » Divergent coverage requirements depending on the size of the employer and whether the health plan has “grandfather” status
- » Enhanced procedures for appeals and external reviews
- » Regulations governing the use of employer wellness programs

- » Expanded Medicaid eligibility
- » Calculation of penalties for failure to provide minimum essential coverage

### **PP. Responding to OIG/DOJ Quality of Care False Claims Act Investigations**

*J. Richard Kiefer  
Howard L. Sollins*

- » Current OIG/DOJ investigations of long term care providers
- » Responding to and negotiating scope of subpoenas for documents
- » Electronically stored data: preservation, production and searches
- » Impact of new legislation on investigations
- » Regulatory initiatives
- » Do compliance programs need revision?

11:50 am-1:00 pm

**Lunch on your own**

### **CONCURRENT SESSIONS**

1:00-2:00 pm

#### **L. The Law Department and Compliance Function after Healthcare Reform: Best Practices for Long Term Care Providers in Investigations, Oversight and Dealing with Executives and the Board** (repeat)

#### **S. Medicare and Medicaid Reimbursement for Post Acute Care Providers under National Health Reform** (repeat)

#### **W. Opportunities and Challenges in Financing Long Term Care Facilities through HUD: Perspective of Borrower’s Counsel and a Lender** (repeat)

2:10-3:10 pm

#### **Q. Behavioral Issues and Involuntary Discharges** (repeat)

#### **OO. Employer Compliance with Healthcare Reform: The Statutory and Regulatory Framework** (repeat)

#### **PP. Responding to OIG/DOJ Quality of Care False Claims Act Investigations** (repeat)

### **ADJOURNMENT**

## Program Faculty

### PLANNING COMMITTEE

**Alan E. Schabes, Esq.,**

*Program Chair*

Benesch Friedlander Coplan & Aronoff  
LLP  
Cleveland, OH

**David S. Cade, Esq.**

Deputy General Counsel

US Department of Health and Human  
Services  
Washington, DC

**Dianne J. De La Mare**

Vice President, Regulatory Affairs  
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## Program Materials

AHLA is going green for the 2011 Long Term Care Program! We are trying to reduce the amount of paper we use at our programs. This is both an effort at responsible environmental conservation, and an effort to increase the timeliness of the resources provided to our attendees. We will not automatically be printing binders for everyone. All materials will be available on a website prior to the program so attendees can print what they need for the sessions they plan to attend and handed out on CD at the program. For those who still do want the binder, they will be available for an additional fee; please order on the registration form on page 19.

## Program at a Glance

This year's program includes sessions for Nursing Facility, Assisted Living and Home Health audiences. The grid below indicates for which audience(s) a session is intended: Nursing Facility (NF) attendees; Assisted Living (AL) attendees; and/or Home Health (HH) attendees.

### Monday, February 21, 2011

8:00 am– 5:30 pm	<b>Registration and Information</b>					
8:30 am– 12:45 pm	<b>Assisted Living In-House General Counsel Roundtable</b> <i>sponsored by NCAL</i> (Open only to in-house counsel; attendance is limited and pre-registration is required)					
9:30– 11:30 am	<i>Attendance for each discussion group below is limited to 30 people; there is an additional charge of \$40; and pre-registration is required</i>					
	<b>I. Nursing Facility Introductory Session (NF)</b>  <i>Brockman Burgess</i>	<b>II. Assisted Living Introductory Session (AL)</b>  <i>Goldman Meng</i>	<b>III. Home Health and Hospice Introductory Session (HH)</b>  <i>Dombi</i>	<b>Interactive 1: A Conversation on Fraud Enforcement</b>  <i>Re Reagan</i>	<b>Interactive 2: Counsel for Home Health and Hospice</b> <i>(open to In-House Counsel and Corporate General Counsel)</i>  <i>Camperlengo</i>	<b>Interactive 3: Hot Healthcare Issues Facing the Long Term Care Industry in 2011</b> <i>(open only to In-House Counsel)</i>  <i>Impink Whittle</i>
11:30 am– 1:00 pm	<b>Lunch on your own</b>					
1:00– 3:30 pm	<b>General Session</b> 1:00–1:15 pm <b>Welcome and Introduction</b> <i>Duffy, Griffith, Schabes</i>  1:15–2:00 pm <b>Keynote Address</b> <i>Hash (invited)</i>  2:00–3:30 pm <b>CEO Panel: The Future of Long Term Care and State of Health Reform</b> <i>Schabes (Moderator), Groff, Lukenda, Schutt, Strange</i>					
3:30– 4:00 pm	<b>Coffee Break Sponsored by PointRight Inc. and Upstairs Solutions</b>					
4:00– 5:30 pm  Extended Sessions	<b>A. Compliance Program Realities within the Homecare Business Operations</b> (not repeated) (HH)  <i>Camperlengo Shaner</i>	<b>B. Case Law Update (NF/AL/HH)</b>  <i>Cusic Segroves</i>	<b>C. Legislative and Regulatory Update for All Providers of Long Term Care, Services and Supports (NF)</b>  <i>Greenfield Rolf</i>	<b>D. Legislative and Regulatory Update for Assisted Living (AL)</b>  <i>Bersani Kyllö Polzer</i>	<b>E. Federal Healthcare Reform: Updates and New Initiatives (NF/AL/HH)</b>  <i>Miles</i>	
5:30– 6:30 pm	<b>Reception Sponsored by PointRight Inc. and Upstairs Solutions</b> (attendees, speakers, children, registered spouses and guests welcome)					

## Program at a Glance

**Tuesday, February 22, 2011**

7:00 am– 5:35 pm	<b>Registration and Information</b>					
7:00– 8:30 am	<b>Continental Breakfast Sponsored by PointRight Inc. and Upstairs Solutions</b> (attendees, speakers, children, registered spouses and guests welcome)					
<b>Please note the start times of the following sessions</b>						
8:00– 9:30 am  Extended Sessions	<b>F. Legislative and Regulatory Update for Home Health and Hospice</b> (not repeated) (HH)  <i>Dombi Keyserling</i>	<b>B. Case Law Update</b> (repeat) (NF/AL/HH)  <i>Cusic Segroves</i>	<b>E. Federal Healthcare Reform: Updates and New Initiatives</b> (repeat) (NF/AL/HH)  <i>Miles</i>	8:30- 9:30 am	<b>G. The Fair Housing Act, ADA Reasonable Accommodation and Assisted Living and Senior Housing</b> (AL)  <i>Dale</i>	<b>H. Drugs in Long Term Care: What's the Problem?</b> (NF/AL)  <i>Mathis Miltenberger</i>
9:45– 10:45 am	<b>J. To Code or Not to Code – Considerations and Consequences at the End of Life</b> (not repeated) (AL/NF)  <i>Horowitz Senft</i>	<b>K. Distress Facility Transaction Case Study: Legal, Regulatory and Financial Issues</b> (not repeated) (NF)  <i>Gadberry Puri</i>	<b>L. The Law Department and Compliance Function after Healthcare Reform: Best Practices for Long Term Care Providers in Investigations, Oversight and Dealing with Executives and the Board</b> (NF/AL/HH)  <i>Berdzik Jordan November</i>	<b>M. The Hottest Labor and Employment Law Issues Impacting Long Term Care</b> (NF/AL/HH)  <i>Lyncheski Tabakman</i>	<b>N. SNF/NF Survey and Enforcement Update</b> (NF)  <i>Adams Feldkamp</i>	
11:00 am– 12:00 noon	<b>O. Ancillary Services in Assisted Living: Regulatory, Compliance and Contractual Issues</b> (not repeated) (AL)  <i>Gordon Krisztal</i>	<b>P. Legal Issues Regarding Innovative Home Care Delivery Models</b> (not repeated) (HH)  <i>Bayne Pyles</i>	<b>Q. Behavioral Issues and Involuntary Discharges</b> (NF/AL)  <i>Jose</i>	<b>R. MDS 3.0 and the Thin Line between Love and Hate</b> (NF)  <i>Infante Littlehale</i>	<b>S. Medicare and Medicaid Reimbursement for Post Acute Care Providers under National Health Reform</b> (NF/AL)  <i>Hamme Lambowitz</i>	
12:00 noon– 1:30 pm	<b>Lunch on your own or attend the Long Term Care, Senior Housing, In-Home Care and Rehabilitation Practice Group Luncheon</b> (additional fee; limited attendance; pre-registration required – see page 19)					

*Continued, next page*

## Program at a Glance

**Tuesday, February 22, 2011** (continued)

1:45– 2:45 pm	<b>T. Nurse Delegation in Long Term Care and Assisted Living: Getting It Right so You Do No Wrong</b> (not repeated) (AL)  <i>Lightfoot</i>	<b>U. Legal Issues Relating to Marketing of Homecare and Hospice</b> (not repeated) (HH)  <i>Randall</i>	<b>V. Legal Ethics: Issues in Investigations and Multiple Party Representations</b> (NF/AL/HH)  <i>Cook Gardner</i>	<b>W. Opportunities and Challenges in Financing Long Term Care Facilities through HUD: Perspective of Borrower's Counsel and a Lender</b> (NF/AL)  <i>Lang Matt</i>	<b>R. MDS 3.0 and the Thin Line between Love and Hate</b> (repeat) (NF)  <i>Infante Littlehale</i>	
3:00– 4:00 pm	<b>X. Adjudicating DAB Appeals – A Discussion with DHHS Counsel</b> (not repeated) (NF)  <i>Markenson Routman (invited)</i>	<b>Y. Buying and Selling Skilled Nursing and Assisted Living Facilities</b> (not repeated) (AL)  <i>Vaughn</i>	<b>Z. Hot Topics in Hospice and Homecare Litigation</b> (not repeated) (HH)  <i>Daucher Reagan</i>	<b>AA. Developing an Effective Compliance Program for the Small Provider</b> (NF/AL/HH)  <i>Abell Hoffman</i>	<b>M. The Hottest Labor and Employment Law Issues Impacting Long Term Care</b> (repeat) (NF/AL/HH)  <i>Lyncheski Tabakman</i>	
<b>Please note the end times of the following sessions</b>						
4:15– 5:15 pm	<b>BB. Home Health Transactions in the Era of the 36 Month Rule</b> (not repeated) (HH)  <i>Hill</i>	<b>CC. Medicaid Rate Litigation Update</b> (not repeated) (NF)  <i>Duffy Harkins</i>	<b>DD. Tax and Legal Issues for Not-for-Profit Long Term Care Providers and Their For-Profit Managers and Partners</b> (not repeated) (NF/AL/HH)  <i>Brent Rosenthal</i>	4:15- 5:45 pm  Extended Sessions	<b>C. Legislative and Regulatory Update for all Providers of Long Term Care, Services and Supports</b> (repeat) (NF)  <i>Greenfield Rolf</i>	<b>D. Legislative and Regulatory Update for Assisted Living</b> (repeat) (AL)  <i>Bersani Kylo Polzer</i>
5:15– 6:30 pm	<b>Reception Sponsored by PointRight Inc. and Upstairs Solutions</b> (attendees, speakers, children and registered spouses and guests welcome)					

**Wednesday, February 23, 2011**

7:30 am– 3:10 pm	<b>Registration and Information</b>				
7:30– 8:30 am	<b>Continental Breakfast Sponsored by PointRight Inc. and Upstairs Solutions</b> (attendees, speakers, children, registered spouses and guests welcome)				
8:30– 9:30 am	<b>EE. Legal Ethics: "Don't Ask - Don't Tell": Attorney-Client Privilege, Work Product and Confidences</b> (not repeated) (NF/AL/HH)  <i>Lax</i>	<b>FF. PPACA's New Anti-Fraud Initiatives Targeting Long Term Care Providers/ Compliance Issues in Transparency and Disclosure</b> (not repeated) (NF)  <i>Maag Serbaroli</i>	<b>GG. Event Reporting and Risk Management</b> (not repeated) (AL)  <i>Sheffield Sumner</i>	<b>H. Drugs in Long Term Care: What's the Problem?</b> (repeat) (NF/AL)  <i>Mathis Miltenberger</i>	<b>N. SNF/NF Survey and Enforcement Update</b> (repeat) (NF)  <i>Adams Feldkamp</i>

Continued, next page

## Program at a Glance

**Wednesday, February 23, 2011** *(continued)*

9:40– 10:40 am	<b>HH. Regulatory Issues: Responding to Surveys and Adverse Events, Utilizing the Appeal Process</b> (not repeated) (AL)  <i>Mack Walsh</i>	<b>JJ. Program Issues: CLASS and Elder Justice</b> (not repeated) (NF/AL)  <i>Greenlee</i>	<b>K. Home Health and Hospice Relationships with Long Term Care Facilities: Avoiding Common Compliance Mistakes</b> (not repeated) (HH)  <i>Markette</i>	<b>V. Legal Ethics: Issues in Investigations and Multiple Party Representations</b> (repeat) (NF/AL/HH)  <i>Cook Gardner</i>	<b>AA. Developing an Effective Compliance Program for the Small Provider</b> (repeat) (NF/AL/HH)  <i>Abell Hoffman</i>
10:50– 11:50 am	<b>LL. Operational and Regulatory Issues in CCRCs</b> (not repeated) (AL)  <i>Durso</i>	<b>MM. Home Care Audits and Claims Denials: Dealing with Medicare and Medicaid Claims Denials from ZPICs to RACs to Appeals</b> (not repeated) (HH)  <i>Bonn</i>	<b>NN. Crisis Management Planning – Communication and Beyond</b> (not repeated) (NF/AL/HH)  <i>Adelman Tyler</i>	<b>OO. Employer Compliance with Healthcare Reform: The Statutory and Regulatory Framework</b> (NF/AL/HH)  <i>Taylor</i>	<b>PP. Responding to OIG/DOJ Quality of Care False Claims Act Investigations</b> (NF)  <i>Kiefer Sollins</i>
11:50 am– 1:00 pm	<b>Lunch on your own</b>				
1:00– 2:00 pm	<b>L. The Law Department and Compliance Function after Healthcare Reform: Best Practices for Long Term Care Providers in Investigations, Oversight and Dealing with Executives and the Board</b> (repeat) (NF/AL/HH)  <i>Berdzik Jordon November</i>	<b>S. Medicare and Medicaid Reimbursement for Post Acute Care Providers under National Health Reform</b> (repeat) (NF/AL)  <i>Hamme Lambowitz</i>	<b>W. Opportunities and Challenges in Financing Long Term Care Facilities through HUD: Perspective of Borrower's Counsel and a Lender</b> (repeat) (NF/AL)  <i>Lang Matt</i>		
2:10– 3:10 pm	<b>Q. Behavioral Issues and Involuntary Discharges</b> (repeat) (NF/AL)  <i>Jose</i>	<b>OO. Employer Compliance with Healthcare Reform: The Statutory and Regulatory Framework</b> (repeat) (NF/AL/HH)  <i>Taylor</i>	<b>PP. Responding to OIG/DOJ Quality of Care False Claims Act Investigations</b> (repeat) (NF)  <i>Kiefer Sollins</i>		

## Program Information

**Dates:** February 21-23, 2011  
**Place:** Manchester Grand Hyatt  
One Market Place  
San Diego, CA 92101  
**Phone:** (619) 232-1234

### Registration Fees:

All members of AHLA, AAHSA, AHCA, ALFA, ASHA, NAHC and NCAL are entitled to member rates.

### Postmarked and paid by January 31, 2011

\$790 For the first Member  
\$715 For each additional Member  
\$690 For In-House Counsel Members  
\$1015 Non-Members  
\$550 Non-Attorney Providers

### Postmarked and paid between February 1- February 14, 2011\*

\$915 For the first Member  
\$940 For each additional Member  
\$690 For In-House Counsel Members  
\$1140 Non-Members  
\$550 Non-Attorney Providers

Printed Course Materials: \$75

\* Registration fees increase \$100 after this date.

If you have indicated an incorrect amount due to errors in addition or not being eligible for a specific rate, AHLA will charge the correct amount to the credit card you have supplied.

**Discounted Registration Fees:** Government employees, academicians, solo practitioners and students: please call (202) 833-1100, prompt #2 for special discounted registration fees.

**Spouse/Guest Fee:** For an additional \$50 spouses and adult guests can register to attend the receptions on Monday and Tuesday evenings and the breakfasts on Tuesday and Wednesday mornings. Please sign up on the registration form on page 19 (Children are welcome to attend at no additional charge).

**Continuing Education:** Participants will be given continuing education forms at the program. Forms must be completed and returned to AHLA staff to receive credit. AHLA is an approved sponsor of continuing legal education credits in most states. This seminar will be worth approximately 17.75 continuing education credits (including 2.0 ethics credit) based on a 60-minute hour and 20.7 credits (including 2.4 ethics credits) based on a 50-minute hour. This seminar will be worth approximately 17.0 nursing home administrator credits.

AHLA is registered with the National Association of State Boards of Accountancy (NASBA) as a sponsor of continuing professional education on the National Registry of CPE Sponsors. State boards of accountancy have final authority on the acceptance of individual courses for CPE credit. Complaints regarding registered sponsors may be addressed to the National Registry of CPE Sponsors, 150 Fourth Avenue North, Suite 700,

Nashville, TN 37219-2417. Web site: [www.nasba.org](http://www.nasba.org). This seminar will be worth approximately 20.0 CPE credits.

There are no prerequisites or advanced preparations required to register for this group live program. Sessions are intermediate or advanced unless otherwise noted. Those seeking accounting credits should be familiar with the concepts of law and terminology associated with the area of long term care in order to obtain the full educational benefit of this program.

**Hotel Reservations:** Hotel accommodations are not included in the registration fee. To make a reservation call the Manchester Grand Hyatt at (619) 232-1234 or 888-421-1442 by January 31, 2011. *When calling, please indicate that you are attending the AHLA program to get a room in the AHLA block at a rate of \$239 single or double occupancy. Rooms at the group rate are limited and may sell out.*

**Membership:** Dues are \$185 for those admitted to the Bar/graduated from college within the last four years; \$300 for those admitted/graduated more than four but less than eight years ago; and \$345 for those admitted/graduated eight or more years ago. Dues are \$155 (or \$75 for electronic benefits) for government employees and full-time academicians; and \$15 for full-time law school students to receive benefits electronically. Include the applicable membership fee with your registration form and take advantage of the program registration fee for members.

**Cancellations/Substitutions:** Cancellations must be received in writing *no later than February 14, 2011*. Refunds will not be issued for cancellations received after this date. Registration fees, less a \$125 administrative fee, will be refunded approximately 3-4 weeks following the program. If you wish to send a substitute or need more information regarding refund, complaint and program cancellation policies, please call the Member Service Center at (202) 833-1100, prompt #5. Please note that registration fees are based on the membership status of the individual who actually attends the program.

**Special Needs:** If you have needs requiring special assistance or accommodations, including special dietary needs, or have questions about accessibility issues at the program, contact our special needs coordinator, Valerie Eshleman at (202) 833-0784 or [veshleman@healthlawyers.org](mailto:veshleman@healthlawyers.org).

**Travel:** Association Travel Concepts (ATC) has negotiated discounts with United Airlines, Enterprise and Avis Rental Car to bring you special airfares and car rental rates lower than those available to the public. Some restrictions may apply and a service fee may apply. ATC will search for the lowest available fare on any airline.

### ASSOCIATION TRAVEL CONCEPTS

1-800-458-9383

email: [reservations@atcmeetings.com](mailto:reservations@atcmeetings.com)

Online: <http://www.atc.meetings.com/ahla>

ATC is available for reservations from 8:30 am until 8:00 pm Eastern, Monday through Friday.

## Program Registration Form – Long Term Care

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**To register:** Remit payment and completed registration form by mail to the American Health Lawyers Association • P.O. Box 79340 • Baltimore, MD 21279-0340 or fax with credit card information to (202) 775-2482. To register by phone call (202) 833-1100, prompt #2. To register online go to [www.healthlawyers.org/programs](http://www.healthlawyers.org/programs).

Name: \_\_\_\_\_ Member ID #: \_\_\_\_\_  
 First Name for Badge (if different than above): \_\_\_\_\_ Spouse/Guest Name: \_\_\_\_\_  
 Title: \_\_\_\_\_  
 Organization: \_\_\_\_\_  
 Address: \_\_\_\_\_  
 City: \_\_\_\_\_ State: \_\_\_\_\_ ZIP+ 4: \_\_\_\_\_  
 Telephone: (\_\_\_\_) \_\_\_\_\_ Fax: (\_\_\_\_) \_\_\_\_\_  
 E-Mail: \_\_\_\_\_

All members of AHLA, AAHSA, AHCA, ALFA, ASHA, NAHC and NCAL are entitled to member rates

**Early Registration Fees (faxed/postmarked and paid on or before January 31, 2011):**

Members:  \$790      In-House Counsel Members:  \$690      Non-Members:  \$1015

\$715 each additional member registering from same organization at same time on the same check or credit card payment       \$550 Non-Attorney Provider

**Registration Fees (faxed/postmarked and paid between February 1- 14, 2011):**

Members:  \$915      In-House Counsel Members:  \$690      Non-Members:  \$1140

\$940 each additional member registering from same organization at same time on the same check or credit card payment       \$550 Non-Attorney Provider

I will require:  audio  visual  mobility  I have special dietary needs  other assistance \_\_\_\_\_

I am a Member of:  AHLA     AAHSA     AHCA     ALFA  
 ASHA     NAHC     NCAL

**PAYMENT INFORMATION**

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\$ \_\_\_\_\_ Registration Fee  
 \_\_\_\_\_ NCAL Sponsored Session (no charge, pre-registration required)  
 Assisted Living In-House General Counsel Roundtable (Monday, February 21)  
 \$ \_\_\_\_\_ Interactive Discussion Group (\$40); (Monday, February 21); (please indicate group you plan to attend)  
 1. A Conversation on Fraud Enforcement     3. Nursing Facility In-House Counsel  
 2. Home Health and Hospice In-House and Corporate General Council  
 \$ \_\_\_\_\_ Long Term Care, Senior Housing, In Home Care and Rehabilitation Practice Group Luncheon (\$35 for members of the LTC-SIR PG/\$45 for non-members of the LTC-SIR PG; Tuesday, February 22)  
 \$ \_\_\_\_\_ Printed Course Materials (\$75)  
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**Printed Course Materials**

All attendees will receive an electronic version of the full set of course materials for the program. If you would like to purchase a binder, please indicate that below:

I am registering for the Long Term Care Program and would like to purchase the binder for \$75



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