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Five lines of attack

by Kelly M. Willenberg, DBA, RN, CHRC, CHC

If you have not seen the U.S. Department of Justice’s news release on the H. Lee Moffitt Cancer Center & Research Institute Hospital, in the past few months I urge you to read it and absorb what it means for your billing compliance in research. Moffit agreed to a \$19.5 million dollar resolution of liability related to a self-disclosure of improper billing for clinical trial costs in January of this year. Voluntarily disclosing and fully cooperating with the government’s investigation resulted in a settlement both to Medicare and the state’s Medicaid plan.^[1]

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