

CMS Has Spoken: FMV and Commercial Reasonableness Under the New Stark Regulations

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- Understand the new definitions of fair market value (“FMV”), general market value (“GMV”), and commercial reasonableness (“CR”)
- Examine the updated criteria for determining FMV, GMV, and CR
- Apply the new framework for using and not using survey data or FMV and GMV
- Evaluate the impact of practice losses for FMV and CR purposes

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