

Hannah L. Cross

Partner

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Hannah is a partner in the Healthcare Regulatory, Compliance, and Operations Practice and focuses her practice on fraud and abuse, compliance, and internal investigations. Having deep knowledge of the Stark Law, the Anti-Kickback Statute, and the Civil Monetary Penalties Law, Hannah regularly provides advice and counsel to healthcare providers on compliance with these laws. She is also well-versed in Medicare enrollment and billing rules, regulations, and guidance documents and provides practical counseling to providers on these topics. She leads internal investigations as part of compliance programs as well as guides clients through investigations pursuant to government enforcement actions.

In her transactional practice, she oversees the regulatory due diligence process for complex healthcare acquisitions and investments, including nursing home, physician practice group, and hospital transactions. She works closely with clients to identify, assess, and manage compliance and reimbursement risks that may affect deal structure or valuation. Her diligence work often involves navigating federal and state licensure, reimbursement, and fraud and abuse considerations, and coordinating with transactional counsel, lenders, and consultants to develop practical risk mitigation strategies that align with business objectives.

Hannah also serves as outside general counsel to a broad range of healthcare providers and entities, including nonprofit professional medical societies. In this capacity, she provides strategic corporate, operational, and regulatory advice on governance, compliance program design, contracting, policy development, and interactions with payors and government agencies. Her experience includes guiding boards and leadership teams through complex compliance and ethical matters, advising on organizational structure and oversight, and supporting mission-driven organizations in maintaining transparency and accountability in their operations.

Hannah is certified in Healthcare Compliance (CHC) by the Society of Corporate Compliance and Ethics and the Health Care

Education

University of Maryland Francis King
Carey School of Law, JD (2013)

- Health Law Certificate
- Manuscripts Editor, *Journal of Health Care Law and Policy*

University of Wisconsin–Madison, BA,
Political Science and Classical
Humanities (2010)

- Certificate in European Studies

Admissions

District of Columbia

Florida

U.S. District Court for the District of
Columbia

Supreme Court of the United States

Practice Areas

Healthcare Regulatory, Compliance &
Operations

Healthcare Providers & Suppliers

Healthcare Transactions

Non-Profit Organizations

Compliance Association (SCCE/HCCA). This national accreditation reflects a professional level of competence and experience in compliance processes used in assisting healthcare business organizations to understand and address legal obligations and promote organizational governance and integrity through the operation of effective compliance programs.

Hannah is a frequent speaker and writer and contributes to national healthcare organizations, including speaking directly to boards, large audiences, and legal and compliance departments.

Experience

The following is a selected sampling of matters and is provided for informational purposes only. Past success does not indicate the likelihood of success in any future matter.

Representative Matters

- Performed Stark Law compliance investigation for an acute care hospital.
- Conducted and managed due diligence on behalf of a REIT in its acquisition of the real property associated with 130 Texas skilled nursing facilities and the simultaneous transfer of operations of the same.
- Advised an international professional medical society Board of Directors on governance, regulatory, contract, and policy matters.
- Conducted and managed due diligence on behalf of a REIT in its acquisition of the real property associated with 61 Florida skilled nursing and assisted living facilities and the simultaneous transfer of operations of the same.
- Represented numerous providers in Provider Relief Fund Decision Reviews, resulting in favorable determinations and retention of payments.
- Negotiated settlement with the U.S. Department of Health and Human Services Office of Inspector General on behalf of a hospital through the Provider Self Disclosure Protocol.
- Led internal investigations for multiple hospital system clients and delivered memorandums to Board of Directors.
- Created and executed strategies for reviewing and maintaining compliance with the Stark Law for multiple health care systems.
- Provided detailed 50-state survey of nursing pool license requirements and employment agency requirements for national nurse staffing agency.
- Advised tax-exempt hospitals on financial assistance policies and procedures in compliance with 501(r) requirements.
- Developed and administered integrated clinical trial document review, tracking, negotiation, and management solution for a biopharmaceutical company.
- Drafted policies and procedures relating to clinical trial

negotiations for major biopharmaceutical company.

- Represented hospital in petition to the Centers for Medicare and Medicaid Services, resulting in receipt of favorable Critical Access Hospital co-location advice to allow a new behavioral health facility to be established.
- Provided specialized Medicare and Medicaid reimbursement advice to litigation teams in defense of multiple False Claims Act Qui Tam actions.
- Advised national telehealth provider on Medicare enrollment regulations and rules relating to telehealth services.
- Provided health care regulatory due diligence advice in multiple transactions.
- Advised hospital systems and physician groups on state licensing requirements.
- Counseled health care organizations on compliance program effectiveness and provided suggested processes relating to the same.

Previous Professional Experience

- Associate, Florida law firm (2013–2015)
- Law clerk, Office of Hearings, Centers for Medicare and Medicaid Services (Fall 2012)
- Summer graduate associate, Medicaid Fraud Unit, New York City Human Resources Administration (Summer 2012)
- Law clerk, Office of General Counsel, Sinai Hospital of Baltimore (2011–2012)
- Legal intern, Central Office of Legal Affairs, New York City Health and Hospitals Corp. (Summer 2011)

Educational Activities

- University of Maryland School of Law
 - Student Attorney, Maryland Law Clinic: HIV/AIDS Health Delivery & Child Welfare Legal Issues

Recognitions

The bar rules of some states require that the standards for an attorney's inclusion in certain public accolades or recognitions be provided. When such accolades or recognitions are listed, a hyperlink is provided that leads to a description of the respective selection methodology.

- [The Best Lawyers in America® Ones to Watch](#), Health Care Law (2021–2026)

Articles & Speeches

Insights

[CARES Act Appeals: Key Steps in Addressing Denials and Repayments](#), *Compliance Today*- Author (December 1, 2023)

[The Anatomy of a Clinical Trial Agreement](#)- Co-Author (February 1, 2023)

[Revisiting Tuomey in the New Regulatory Landscape](#), *American Health Law Association*- Author (September 8, 2022)

[Ready, set, go—for 2022 Stark group practice compliance!](#), *Compliance Today*- Co-Author (December 2021)

[CMS Issues Long-awaited Stark Proposed Rulemaking](#)- Author (February 2020)

[CMS Stark Law Revisions Propose 2 Key Exceptions](#), *Law360*- Author (December 11, 2019)

Events/Speaking Engagements

[HCCA 28th Annual Compliance Institute](#)- Speaker (April 14, 2024)

Health Care Compliance Association and Society of Corporate Compliance and Ethics Web Conference 2022 - Speaker (December 15, 2022)

Health Care Compliance Association and Society of Corporate Compliance and Ethics Web Conference 2021 - Speaker (October 5, 2021)

[Health Care Compliance Association and Society of Corporate Compliance and Ethics Web Conference](#)- Speaker (August 4, 2020)

[Nelson Mullins Healthcare Group to Exhibit at HCCA's 22nd Annual Compliance Institute](#)- Speaker (April 15-18, 2018)

Responding to Government Requests for Information , *HCCA Regional Conference*(February 2015)

The Future of Compliance: Where Young Attorneys Fit In , *Annual HCCA Compliance Institute Conference*(April 2013)

Alerts

[HRSA Issues First Round of Final Repayment Notices for Certain Provider Relief Fund Recipients](#), Additional Nelson Mullins Alerts (January 11, 2023)

Blogs

[OIG Issues General Compliance Program Guidance](#), Healthcare Essentials - Author (November 8, 2023)

[Creating and Maintaining Privilege over Internal Investigations](#), NM Talks Healthcare Podcast - Speaker (October 20, 2023)

[Transitioning out of the COVID-19 PHE](#), NM Talks Healthcare Podcast - Speaker (April 26, 2023)

[The OIG Provides Stakeholders a Newly Expanded FAQ Process](#), Healthcare Essentials - Co-Author (April 5, 2023)

[Healthcare Provider Upcoding in Government Investigation Crosshairs](#), Investigations - Co-Author (October 21, 2021)

[Increased Enforcement Activity Expected Relating to Healthcare Provider Billing Upcoding](#), Healthcare Essentials - Co-Author (October 15, 2021)

[DOJ Subregulatory Guidance Reliance Returns](#), Investigations - Co-Author (September 8, 2021)

[The Return of Subregulatory Guidance Reliance](#), Healthcare Essentials - Co-Author (September 7, 2021)

[Update Regarding Provider Relief Fund Reporting Requirements](#), Healthcare Essentials - Co-Author (February 26, 2021)

[New Stark Law and AKS Final Rules at Risk of Delay or Replacement Due to GAO Finding of Technical Deficiency and Biden Administration's Regulatory Hold Memo](#), Healthcare Essentials - Co-Author (January 26, 2021)

[CMS Finalizes Major Stark Law Rule](#), Healthcare Essentials - Co-Author (November 23, 2020)

[Murky Waters – The Stark Controversy in Hospital-Physician Relationships](#), Healthcare Essentials - Co-Author (November 20, 2020)

[Enforcement Alert: Fraud and the Paycheck Protection Program, Investigations](#) - Co-Author (Nov. 17, 2020)
[HHS Announces \\$20B Phase 3 Provider Relief Fund to Begin on October 5, 2020](#), Healthcare Essentials - Co-Author (Oct. 2, 2020)
[CMS Addresses Common Questions Regarding Stark Waivers for COVID-19 Purposes](#), Healthcare Essentials - Co-Author (May 5, 2020)
[CMS Announces Reevaluation and Suspension of the Accelerated and Advance Payment Programs](#), Healthcare Essentials - Co-Author (April 30, 2020)
[HHS Publishes Provider Relief Fund FAQ and Further Guidance](#), Healthcare Essentials - Co-Author (April 28, 2020)
[Breaking News – HHS Announces Further Plans for Provider Relief Fund Monies](#), Healthcare Essentials - Co-Author (April 24, 2020)
[A Guide to the CARES Act Medicare Provider Relief Fund](#), Healthcare Essentials - Co-Author (April 20, 2020)
[OIG Issues AKS Policy Statement Following Stark Waivers](#), Healthcare Essentials - Author (April 8, 2020)
[CMS Publishes Final Rule Announcing New Enrollment and Participation Enforcement Authorities](#), Healthcare Essentials - Co-Author (October 23, 2019)
[Proposed Coordinated Care Revisions to the Medicare Physician Self-Referral Law](#), Healthcare Essentials - Author (October 17, 2019)