



Douglas A. Grimm

PARTNER AND HEALTH CARE PRACTICE LEADER

Douglas heads ArentFox Schiff's national Health Care practice, leading a group of more than 70 health care attorneys across the United States. Douglas's clients include hospitals and health systems, physician groups, pharmaceutical companies, and specialty providers.



Industries

[Health Care](#)
[Life Sciences](#)

Practices

[False Claims Act Investigations & Litigation](#)
— [Investigations](#)

Education

The George Washington University Law School,
LL.M., summa cum laude, Health Law
South Texas College of Law Houston, JD, cum laude;
Editor-in-Chief, South Texas Law Review
Virginia Commonwealth University, MHA
The College of William & Mary, BA, Government

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Douglas maintains a national practice guiding and advising health care providers and investment firms through the complex regulatory, transactional, and government enforcement challenges in the health care industry. He previously served as Chief Executive Officer of multiple acute-care hospitals throughout the United States, and remains active in health care administration as a Fellow of the American College of Healthcare Executives (FACHE), the premier certification in health care management. This unique background enables Douglas to provide legal counsel with a practical, pragmatic perspective gained from years of experience as a health care executive and attorney.

Douglas focuses on the areas of mergers and acquisitions; strategic and compliance planning; fraud and abuse; Medicare reimbursement; the Public Health Service Act's 340B program; health information privacy and security; and telehealth. He represents a wide range of clients including health systems, investment funds, group practices, 340B covered entities, clinical laboratories, specialty providers, and medical device manufacturers.

Client Work

Douglas' client engagements include:

- Advised a multi-billion-dollar global retail company in the establishment of clinical laboratories across the United States.
- Defended a national specialty provider before the Department of Justice, FBI, the Centers for Medicare and Medicaid Services, and the Office of the Inspector General in a False Claims Act investigation that resulted in the client walking away with no fines, penalties, or restitution.
- Represented an integrated health system in a whistleblower proceeding that involved parallel Stark and anti-kickback investigations by CMS and OIG of medical necessity issues.
- Advised and defended a 340B covered entity as part of a HRSA audit involving regulatory and compliance issues.
- Advised multiple national telehealth providers regarding reimbursement and regulatory compliance issues.
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Advised a community health system regarding a \$180 million acquisition of multiple Ambulatory Surgery Centers.

- Advised a large academic medical center on the development and implementation of compliance plans and related procedural requirements.
- Represented a specialty surgical hospital before the Department of Justice in a proceeding charging a hospital contractor with criminal fraud and money laundering, with no adverse consequence to the hospital.
- Represented a community health system before the Office for Civil Rights in a HIPAA breach proceeding involving the medical records of over 100,000 patients with no adverse consequences to the health system.
- Represented an investor-owned chain of nursing homes in its sale to a nonprofit community health system.
- Represented physicians and physician groups in various recovery audit contractor proceedings involving claims in excess of \$3 million.

Professional Activities

- Fellow, American College of Healthcare Executives
- Advisory Board Member, Center for Telehealth and e-Health Law
- Member, Healthcare Financial Management Association
- Member, Health Care Compliance Association
- Member, American Health Lawyers Association

Publications, Presentations & Recognitions

Douglas is a frequent author and lecturer on current issues facing health care providers and payors, including trends in fraud and abuse enforcement, HIPAA compliance, and health information technology. He is often quoted in industry publications such as *Bloomberg Law* and *Modern Healthcare*. Recent articles and speaking engagements include:

Artificial Intelligence (AI)

- “The New World of Health Care & AI,” 2024 Medical Staff Leaders and the Law Conference , April 12, 2024
- “AI’s Increasing Role In The Health Care Delivery System: Key Legal Considerations,” *Healthcare Business Today*; August 29, 2023

Telemedicine

- Speaker, “Compliance for Telehealth Providers,” PCC Telehealth Summit of South Carolina, December 5, 2023
- Speaker, “Understanding the Differences to Advance Policy: RPM/RTM is NOT Telehealth or Chronic Care Management,” CTeL Remote Patient Monitoring Summit, October 20, 2022
- Co-Speaker, “Telehealth Reimbursement and Public Policy,” CTeL Digital Health Summit, June 9, 2021
- Moderator, “The State of Telehealth Today: Practical Realities, Public Policy, and the Law,” ArentFox Schiff Webinar, April 28, 2021
- Co-Speaker, “Remote-Patient Monitoring: The New Rule, Scenarios, and Pitfalls to Avoid,” CTeL Digital Health Virtual Summit, December 3, 2020

Transactions/Corporate

- “FTC Hosts ‘Health Check on COPAs: Assessing the Impact of Certificates of Public Advantage in Health Care Markets’,” July 9, 2019
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“Increased Health Care M&A Activity: Representation and Warranty Insurance Coverage,” *The Ambulatory M&A Advisor*; December 22, 2014

- Speaker, “Unique Partnerships – Structure,” Pennsylvania Institute of Certified Public Accountants; July 2014 (Hershey, PA)

Compliance/Fraud and Abuse

- Panelist, “The New 340B ADR Final Rule Process: Overview and Implications for the Future,” American Health Law Association’s (AHLA) Education Center Webinar; November 7, 2024
- Panelist, “Health Care Regulation After Loper Bright and Corner Post: Agency Implications, Litigation Challenges, Client Impact,” Strafford CLE Webinar; September 12, 2024
- “A Pebble in the Pond? Potential Ripple of a Court Decision to Vacate the Medicare Part C/D 60-Day Overpayment Rule,” *Health Care Counsel*; September 17, 2018
- Co-Speaker, “Status of the ACA and Provider Compliance Programs,” National Capital Healthcare Executives (NCHE) Meeting; February 20, 2018 (Arlington, VA)
- Co-Speaker, “The Affordable Care Act: What Now?,” Lawline, June 5, 2017 (Webcast)

HIPAA/Privacy

- Speaker, “Cyber Vulnerabilities: What to Know and What to Do,” Healthcare Group Purchasing Industry Initiative, May 16, 2019
- Panelist, “Health Care Technology 2017: Critical Issues in Cybercare, Digital Medicine, and Structuring Effective Agreements,” PLI Annual Health Care IT Conference; June 13, 2017 (New York, NY)
- Panelist, “Health Care IT 2016: New Technology, New Legal Issues,” PLI Annual Health Care IT Conference; June 3, 2016 (New York, NY)

Reimbursement

- Co-Speaker, “Telehealth Reimbursement and Public Policy,” CTel Digital Health Summit, June 9, 2021
- Speaker, “HHS’s Provider Relief Fund: What Happens After Today?,” Virginia-DC HFMA Spring Education Virtual Conference, April 15, 2021
- “CMS Releases CY 2020 Proposed Physician Fee Schedule,” *Health Care Counsel*; August 2, 2019

Research

- *FDA, CLIA, or a “Reasonable Combination of Both”: Toward Increased Regulatory Oversight of Genetic Testing*, 41 San Francisco L. Rev. 107 (2006), available at <https://repository.usfca.edu/usflawreview/vol41/iss2/1>
- *Informed Consent for All! No Exceptions*, 37 New Mexico L. Rev. 39 (2007), available at <https://digitalrepository.unm.edu/nmlr/vol37/iss1/4>

Life Beyond the Law

A dual citizen of the US and UK, Douglas spends his time with his wife, Milena, and their family. A former member of many bands, Douglas loves music of all kinds and has produced six albums of guitar and techno-based tunes.

Bar Admissions

[District of Columbia](#)

[Texas](#)

Court Admissions

[Supreme Court of the United States](#)

[US District Court, District of Columbia](#)