



# Douglas A. Grimm

PARTNER AND HEALTH CARE PRACTICE CO-LEADER

Douglas leads ArentFox Schiff's nationally recognized Health Care practice, directing a team of more than 70 attorneys across the United States. His clients include health care providers, investors, and life sciences companies.



## Industries

### Health Care

- Hospitals & Health Systems
- Health Care AI
- Health Care Transactions
- Medicare Certification, Compliance & Enforcement Defense
- Government Investigations
- Telemedicine & eHealth
- Health Privacy, Security & HIPAA
- Managed Care, Payer Disputes & Reimbursement

### Life Sciences

#### AI & Emerging Technologies

#### Long Term Care & Senior Living

- Health Care Advisory & Strategic Transactions

## Practices

### False Claims Act Investigations & Litigation

## 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

## Offices

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Douglas maintains a national practice advising health care providers and investment firms on the full spectrum of regulatory, transactional, and litigation challenges. He frequently serves as outside general counsel to his clients, providing comprehensive guidance across their business and legal needs rather than handling only discrete matters. His experience in both the health care industry and his clients' operations enables him to anticipate issues, identify opportunities, and deliver practical counsel. Clients rely on him not only for high-stakes transactions, regulatory advice, and government enforcement defense, but also for day-to-day legal guidance that keeps their organizations compliant, efficient, and well-positioned for growth.

Prior to practicing law, Douglas served as Chief Executive Officer of multiple acute and long-term care hospitals, giving him an operator's perspective that few attorneys possess. He remains actively involved in health care administration as a Fellow of the American College of Healthcare Executives (FACHE). He has been ranked by *The Legal 500* and *The Best Lawyers in America* and writes and speaks frequently on current issues affecting the health care industry, including AI, regulatory enforcement trends, and reimbursement.

He represents health systems, investment firms, physician groups, specialty providers, and medical device companies on regulatory, transactional, and litigation matters. His practice encompasses AI and information technology; physician-hospital alignment; financing initiatives, including venture capital and private equity investments; Medicare and third-party payor reimbursement counseling and appeals; and 340B statute compliance. He also counsels clients on compliance with the False Claims Act, Anti-Kickback Statute, and Stark Law.

## Client Work

Douglas's client engagements include:

- Advised a multi-billion-dollar global retail company in establishing clinical laboratories across the United States.
- Successfully defended a national specialty provider before the Department of Justice, FBI, the Centers for Medicare and Medicaid Services, and the Office of Inspector General in a False

Claims Act investigation.

- Represented an integrated health system in a whistleblower proceeding involving parallel Stark Law and Anti-Kickback Statute investigations by CMS and OIG.
- Represented an investor-owned chain of nursing homes in its sale to a nonprofit community health system.
- Advised multiple national telehealth providers on reimbursement and regulatory compliance matters.
- 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 consequences to the hospital.
- Advised a community health system on a \$180 million acquisition of multiple ambulatory surgery centers.
- Advised and defended 340B covered entities in connection with HRSA compliance audits.
- Advised a large academic medical center on the development and implementation of compliance programs and related procedural requirements.
- Represented a community health system before the Office for Civil Rights in a HIPAA breach proceeding involving the medical records of more than 100,000 patients, with no adverse consequences to the health system.
- Represented physicians and physician groups in various RAC, UPIC, and ALJ proceedings related to payment disputes.

## Professional Activities

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- Member, Health Policy and Management Executive Council at the Harvard School of Public Health
- Fellow, American College of Healthcare Executives
- Member, Advisory Board of the Center for Telehealth and e-Health Law
- Member, American Health Lawyers Association
- Member, Healthcare Financial Management Association
- Member, Health Care Compliance Association

## Publications, Presentations & Recognitions

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Douglas is often quoted in publications including *Forbes*, *Modern Healthcare*, and *Bloomberg Law*.

Recent articles and speaking engagements include:

### Artificial Intelligence (AI)

- “USA – California: Trends & Developments,” *Chambers Global Practice Guides, Healthcare AI 2025*
- “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**

- “The Strategic Imperative of Curating Health System Board Materials,” *The Governance Institute*, March 2026
- “FTC Hosts ‘Health Check on COPAs: Assessing the Impact of Certificates of Public Advantage in Health Care Markets,’” July 9, 2019
- “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 (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

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A dual citizen of the United States and United Kingdom, Douglas spends his time with his wife, Milena, and their family. A former member of numerous bands, Douglas is passionate about music of all kinds and has released six solo albums of guitar and electronic music.

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### Bar Admissions

[District of Columbia](#)

[Texas](#)

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### Court Admissions

[Supreme Court of the United States](#)

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