ArentFox Schiff LLP
Attorneys

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
— Government Investigations
— Medicare Certification, Compliance & Enforcement Defense
— Provider-Payor, Health Plan & Managed Care Disputes
— Health Care AI
— Health Care Transactions
— Telemedicine & eHealth
— Health Privacy, Security & HIPAA
Life Sciences
AI & Emerging Technologies
Long Term Care & Senior Living
— Health Care Advisory & Strategic Transactions
Nonprofits & Associations

Practices

False Claims Act Investigations & Litigation
Government Enforcement & White Collar
Food, Drug, Medical Device & Cosmetic
Government Relations

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	Phone	Email
Washington, DC	202.857.6370	Douglas.Grimm@afslaw.com

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.

Representative Engagements

Douglas's recent client engagements include:

— Advised a multi-billion-dollar global retail company in establishing clinical laboratories across the United States.

— Advised an acute care hospital chain regarding establishment of a national network of ambulatory surgery centers.

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Represented hospitals, specialty providers, and physician groups in Medicare and Medicaid payment disputes involving RACs, UPICs, and ALJs.

- 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, Anti-Kickback Statute, and Stark Law investigation resulting in no adverse findings against the provider.
- Advised and defended 340B covered entities in connection with HRSA compliance audits and pharmaceutical company discount disputes.
- 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 chain of specialty surgical hospitals 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.
- Represented an integrated 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.
- Advised a large academic medical center on the development and implementation of compliance programs across all departments.

Professional Activities

- Member, Health Policy and Management Executive Council, 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 Law Association
- Member, Healthcare Financial Management Association
- Member, Health Care Compliance Association

Publications, Presentations & Recognitions

Douglas's recent articles and speaking engagements include:

Artificial Intelligence (AI)

- "AI in Health Care: *Winters v. OpenAI, Inc. et al.* and the Expanding Liability Landscape," *Health Care Counsel*, July 27, 2026
- "Beyond the Algorithm: How Lifecycle Regulation Is Building Entry Barriers and Concentrating the Healthcare AI Market," *TechREG Chronicle*, May 2026
- "AI Service Agreements in Health Care: Indemnification Clauses, Emerging Trends, and Future Risks," *Health Care Counsel*, July 23, 2025
- "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

340B

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"2027 OPPS and ASC Proposed Rule: CMS Proposes Deep 340B Payment Cuts," *Health Care Counsel,* July 28, 2026

- 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
- "The 340B 'Saga' Continues: As More States Pass 340B Contract Pharmacy Laws, More Lawsuits Follow," *Health Care Counsel,* September 3, 2024

Compliance/Fraud and Abuse

- Panelist, "Noncompetes in Health Care: Legal Developments in 2025 & Practical Guidance for 2026," ArentFox Schiff Webinar, March 11, 2026
- "OIG Issues Special Advisory Bulletin on DTC Prescription Drug Sales to Federal Health Care Program Enrollees," *Health Care Counsel,* February 2, 2026
- "Understanding OIG Advisory Opinion 25-09: Compliance Guidelines for Physician-Owned Medical Device Companies," *Health Care Counsel,* August 18, 2025
- Panelist, "Health Care Regulation After *Loper Bright* and *Corner Post*: Agency Implications, Litigation Challenges, Client Impact," Strafford CLE Webinar, September 12, 2024
- "Post-Chevron Health Care Regulations: The Dawn of a New Day," *Health Care Counsel,* July 12, 2024

Medicare Reimbursement

- "Proposed Health Care Supports in the 2027 DC Budget," *Health Care Counsel,* July 10, 2026
- "OMB Proposed Rule Would Codify Trump Administration Policy Requirements for Federal Financial Assistance," *Health Care Counsel,* June 4, 2026
- "CMS National Enrollment Moratorium on Hospice and Home Health Agencies," *Health Care Counsel,* May 18, 2026
- "CMS ACCESS Model Update: Payment Rates and Performance Targets Released for 2026-2027," *Health Care Counsel,* February 19, 2026
- 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

Digital Health & Telemedicine

- "CMS Innovation Center Unveils ACCESS Model to Expand Technology-Supported Care for Chronic Disease," *Health Care Counsel,* December 23, 2025
- "Telehealth Staffing and Administrative Services Gain Favorable Advisory Opinion From OIG," *Health Care Counsel,* June 27, 2025
- 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
-

"Private Equity Investment in Health Care Providers and Technology – 2025 Midyear Outlook," *Health Care Counsel*, June 18, 2025

- "What Private Equity Investors and Real Estate Investment Trusts Need to Know About the Newly Enacted Massachusetts Health Oversight Law," *Health Care Counsel*, January 9, 2025
- Panelist, "Healthcare M&A and Restructuring Outlook," ArentFox Schiff Webinar, December 1, 2021

HIPAA/Privacy

- "Proposed Changes to the HIPAA Security Rule: What Regulated Entities Need to Know," *Health Care Counsel*, February 7, 2025
- Speaker, "Cyber Vulnerabilities: What to Know and What to Do," Healthcare Group Purchasing Industry Initiative, May 16, 2019

Research

- *Informed Consent for All! No Exceptions*, 37 New Mexico L. Rev. 39 (2007), *available at* https://digitalrepository.unm.edu/nmlr/vol37/iss1/4
- *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

In The News

Douglas is regularly quoted by industry publications and news outlets.

- "Hospitals Take A Hit As ACA Headwinds Build," *Law360*, August 11, 2026
- "Healthcare AI Rules Shift Risk From Regulators to Hospitals," *PYMNTS*, August 4, 2026
- "Healthcare Attys Become 'Producers' to Seal Provider Deals," *Law360*, July 14, 2026
- "Joint Operating Deals Get Another Look in Hospital Tie-Ups," *Law360*, November 11, 2025
- "Immigration crackdown sets off alarms in hospitals," *Axios*, October 14, 2025
- "As Shutdown Continues, Hospital Attys Face Tired Clients," *Law360*, October 7, 2025
- "More time, less paperwork: The quiet revolution in primary care," *Modern Healthcare*, August 6, 2025
- "Effects of Loper Bright Uncertain One Year After Ruling," *Healthcare Risk Management*, May 1, 2025
- "Immigration Enforcement Worries Healthcare Leaders," *Healthcare Risk Management*, April 1, 2025
- "Hospitals Brace For Immigration Agents, Legal Clashes," *Law360*, January 28, 2025
- "Healthcare's AI Integration Is In Limbo As Laws Lag Behind," *Law360*, September 24, 2024
- "States build momentum to protect 340B drug discounts – for now," *Modern Healthcare*, June 26, 2024
- "Fast Appeal In Hospital Merger Row A Sign Of Determined FTC," *Law360*, June 11, 2024
- "HHS Issues HIPAA Best Practices for Telehealth," *Healthcare Risk Management*, March 1, 2024
- "States are ramping up scrutiny of health transactions, as more provider groups look for buyers," *STAT News*, February 12, 2024
- "Healthcare AI Regulations and Ethics – 2024 Health IT Predictions," *Healthcare IT Today*, January 12, 2024

Life Beyond the Law

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.

Bar Admissions

District of Columbia

Texas

Court Admissions

Supreme Court of the United States

US District Court, District of Columbia

US Court of Appeals, 9th Circuit