



→ Gregory R. Smith

Partner

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Greg Smith has served as a trusted advisor to healthcare organizations for the past 25 years, focusing his practice on regulatory compliance and risk management. With deep experience guiding providers through the continually evolving landscape of healthcare regulation, Greg helps clients anticipate issues, solve problems, mitigate risk and maintain operational integrity.

Whether guiding organizations through high-stakes regulatory matters, designing compliance programs, or appealing government audit or survey findings, Greg provides clear guidance and practical solutions by drawing on his comprehensive understanding of the law and the complex realities of healthcare operations.

Regulatory Compliance

Greg brings a pragmatic approach to advising health care providers seeking to understand and comply with federal and state regulatory requirements. Clients – including health systems, hospitals, skilled nursing facilities, laboratories, pharmacies, behavioral health agencies and physician groups, among others - turn to Greg for comprehensive support with:

- Challenging Medicare, Medicaid, and commercial payer audits and appeals
- Managing voluntary self-disclosures to federal and state agencies
- Complying with Medicare and Medicaid documentation and billing requirements
- Structuring transactions and compensation arrangements in compliance with fraud and abuse laws, including the federal Stark law, Anti-Kickback Statute and Civil Monetary Penalties Law
- Adopting, implementing and maintaining effective compliance programs
- Complying with State law restrictions regarding the corporate practice of medicine
- Navigating federal and state exclusion actions and issues
- Complying with Corporate Integrity Agreements

Greg frequently collaborates with his partner Lourdes Martinez in the representation of skilled nursing facilities, which are subject to a complex web of federal and state regulatory requirements. Greg and Lourdes have decades of experience supporting facilities in their day-to-day operations, including appeals of CMS survey deficiencies through Informal Dispute Resolution and administrative hearings before the U.S. Department of Health and Human Services.

Healthcare clients also trust Greg to help them design, update, and implement effective compliance programs that not only meet federal and state requirements but also add value by establishing a culture of compliance and innovation. Greg collaborates closely with leadership and compliance officers to conduct training, investigate potential issues, and establish policies, procedures and protocols that help mitigate risk in a dynamic and rapidly evolving legal environment.

National Resources, Strategic Solutions

Greg is recognized for delivering strategic, actionable advice tailored to the business realities of healthcare. Leveraging Sheppard Mullin's national, multidisciplinary team - one of the largest healthcare practices in the country - as well as the firm's full-service capabilities and commitment to value, allows Greg to provide innovative solutions to his clients.

Honors

Best Lawyers in America: Health Care Law, *Best Lawyers*, 2025-2026

Articles

- Private Equity Faces Heightened FCA and Antitrust Scrutiny
PE Hub, 03.24.2023
- Authored chapter entitled "Billing and Reimbursement Issues for the Physician Office" and co-authored "Life-Sustaining Treatment Decisions" in the Legal Manual of New York Physicians (Sixth Edition)
- Co-author, An Uncertain Future: Examining Two Proposals for Health Care Reform, AHLA Connections, March 2017
- Co-author, Chapter 1 of the LUGPA Practice Management Playbook, entitled Legal and Economic Issues in Forming a Group Practice, 2017
- The Sunshine Act: How to Ensure the Accuracy of Your Disclosures, Medical Economics, March 20, 2014
- Key Provisions of the Patient Protection and Affordable Care Act, Journal of the American College of Radiology, January 2011
- Looking Ahead: 2010 OIG Work Plan, Journal of the American College of Radiology, February 2010

Healthcare Law Blog

- "Deadline Quickly Approaching for NY Nursing Homes and Owners/Operators Regarding CMS Star-Rating Postings," December 19, 2024
- "DHHS Bolsters Non-Discrimination Protections for Recipients of Covered Health Care Services and Activities," May 16, 2024
- "CMS Finalizes Federal Minimum Staffing Standards for Nursing Homes," April 25, 2024
- "CMS Issues a Final Rule Requiring Nursing Facilities and Other Providers and Suppliers to Disclose Additional Ownership Information," November 16, 2023

- "Long Term Care Facilities Face Mandatory Minimum Staffing Requirements," September 6, 2023
- "OIG's Modernization of Compliance Program Guidance: What to Expect," May 11, 2023
- "CMS Issues Proposed Rule Requiring Nursing Homes to Disclose Additional Ownership Information, Including Ties to Private Equity and REITS," February 27, 2023
- "Nursing Homes Brace for Reforms and Heightened Government Scrutiny," January 17, 2023
- "Long Term Care Update: CMS Revises Criteria for its Special Focus Facility Initiative," October 27, 2022
- "U.S. Congressional Committee Takes Aim at For-Profit Nursing Homes," September 30, 2022
- "CMS Issues a "Roadmap" for the End of the COVID-19 Public Health Emergency and Blanket Waivers," September 6, 2022
- "Nursing Homes Beware: the Government has Increased Its Scrutiny of Related Parties," August 22, 2022
- "OIG Warns Physicians About Entering into Arrangements with Telemedicine Companies," July 25, 2022
- "CMS Adopts Major Changes to LTC Facility Surveyor Guidance," July 5, 2022

Media Mentions

HHS Releases Nursing Home Owner, Manager Disclosure Rule
Law360, 11.15.2023

Rising focus on False Claims puts skilled nursing providers in crosshairs, attorneys warn
McKnights Long-Term Care News, 08.09.2023

Speaking Engagements

- "Private Equity Firms Facing Heightened False Claims Act and Antitrust Risks," ABA's Health Law Roundtable, January 25, 2024
- "Focusing on Quality and Compliance," Greater New York Health Care Facilities Association, March 6, 2019
- "Federal and State Stark and Anti-Kickback Laws 'Decision Tree'," New York State Bar Association Health Law Section, Fall Meeting, October 26, 2018
- "Year End Audit Update and Trending Topics for Physicians and Hospitals," Sunshine Act and Conflict of Interest, Healthcare Financial Management Association, November 21, 2013

Events

The Big, Beautiful Webinar Series: Strategic Planning for Post-Acute/LTC Providers
10.20.2025

The Big, Beautiful Webinar Series - Part One: An Introduction to the One Big Beautiful Bill Act
07.21.2025

Preparing for Change: New CMS Survey Guidance Effective March 24, 2025
02.18.2025

Tips for Evaluating the Effectiveness of your Compliance Program
Webinar, 03.20.2024

CMS Proposes Minimum Staffing Requirements for Skilled Nursing Facilities
Webinar, 09.27.2023

Discussion of How Home Health Agencies, Skilled Nursing Facilities Face Increased False Claims Act
Enforcement Risk
Webinar, 08.02.2023

Beware: Private Equity Firms Facing Heightened False Claims Act and Antitrust Risks
Webinar, 04.26.2023

Essential Updates for Nursing Homes
Webinar, 03.22.2023

New York State OMIG Publishes New Guidance on Health Care Compliance Programs, Self-Disclosures and
Medicaid Managed Care Fraud, Waste & Abuse Prevention
Webinar, 02.22.2023

Preparing for 2023: Nursing Homes Brace for Reforms and Heightened Government Scrutiny
Webinar, 01.19.2023

SNF Updates Including Implementation of Phase 3
Long Island Marriott, 09.14.2022

Memberships

American Health Care Association
National Center For Assisted Living
American Health Lawyers Association
New York State Bar Association
Health Care Compliance Association

Podcasts & Webinars

The Big, Beautiful Webinar Series: Strategic Planning for Post-Acute/LTC Providers
10.20.2025

The Big, Beautiful Webinar Series - Part One: An Introduction to the One Big Beautiful Bill Act
07.21.2025

Preparing for Change: New CMS Survey Guidance Effective March 24, 2025
02.18.2025

Tips for Evaluating the Effectiveness of your Compliance Program (and Why it Matters)
03.20.2024

CMS Proposes Minimum Staffing Requirements for Skilled Nursing Facilities
09.27.2023

Home Health Agencies, Skilled Nursing Facilities Face Increased False Claims Act Enforcement Risk
08.02.2023

Beware: Private Equity Firms Facing Heightened False Claims Act and Antitrust Risks
04.26.2023

New York State OMIG Publishes New Guidance on Health Care Compliance Programs, Self-Disclosures and Medicaid Managed Care Fraud, Waste & Abuse Prevention
02.22.2023

Preparing for 2023: Nursing Homes Brace for Reforms and Heightened Government Scrutiny
01.19.2023

Practices

False Claims Act
Governmental
Healthcare

Industries

Healthcare

Education

J.D., Hofstra University School of Law, 1999, with distinction
B.A., State University of New York at Plattsburgh, 1993

Admissions

New York