



→ Kathleen M. Stratton

Special Counsel

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Kathleen Stratton is special counsel in the Governmental Practice in the firm's Washington, D.C. office.

Areas of Practice

Kathleen represents healthcare industry clients in matters focusing predominantly on regulatory compliance, licensure, certification and operational issues facing a vast array of provider types. Over the past 30 years, her provider clients have included hospitals, specialty pharmacies, ambulatory surgery centers, durable medical equipment suppliers, skilled nursing facilities, primary care clinics, individual physicians and physician group practices.

Representing such a wide variety of health care providers, Kathleen has had the opportunity to counsel her clients in numerous matters providers face every day. She assists providers in defending against False Claims Act and other government investigations, advises them on issues involving health care fraud and abuse laws and is often integrally involved in the implementation and monitoring of corporate compliance programs. Kathleen has had the unique experience of serving as an IRO for a pharmaceutical company subject to a corporate integrity agreement. Finally, she has significant experience in the specialty area of certificate of need law.

Articles

Healthcare Law Blog Posts

- "CMS Proposes to Amend Overpayment Rule-Questions Remain Regarding How the Rule Will be Implemented Should CMS Adopt the False Claims Act's "Reckless Disregard or Deliberate Ignorance" Standard," July 22, 2024
- "CMS Proposes to Amend Overpayment Rule, Remove Potential Overpayment and False Claims Act Liability for Mere Negligence," December 27, 2022
- "Supreme Court To Review DOJ's Authority to Dismiss Qui Tam FCA Suits Over Objections From Relators," June 30, 2022
- "OIG Issues Favorable Advisory Opinion for Physician-Owned Medical Device Company," June 27, 2022
- "CMS Loosens Restrictions on Co-Located Healthcare Providers; Enforcement Interpretation Still to Be Determined," December 3, 2021
- "Executive Order on Promoting Competition in the American Economy: The Biden Administration Considers Drug Pricing Strategies While Keeping the "Most Favored Nations" Drug Reimbursement Program on the

Sidelines," August 20, 2021

- "Medicare Part B Most Favored Nation Drug Pricing Model: New Rules, New Lawsuits, New Tweets," December 21, 2020
- "CMS Finalizes Medicare Advantage Price Transparency Requirements, Despite Industry Criticism," September 11, 2020
- "CMS Issues Temporary Waivers in Broad Coronavirus Response," April 2, 2020
- "Key Health Care Provisions of the Coronavirus Aid, Relief, and Economic Security Act (the "CARES Act")," March 30, 2020

- "Surprise Billing Initiatives Face Not-So-Surprising Resistance," December 13, 2019
- "Quality Improvement Programs," November 1, 2018

False Claims Act Defense Law Blog

- "OIG Report on Topical Compounded Drug Prescribing, Marketing and Billing Practices Signals Heightened Administrative and Enforcement Scrutiny," November 2, 2018

Events

Women in Healthcare Leadership Collaborative (WHLC) Presents: A View from the Capitol
2020 Healthcare Policy, Legal and Regulatory Predictions
Sheppard Mullin, New York and Sheppard Mullin, San Francisco, 01.23.2020

Healthcare - What You Need to Know in 2020
Roundtable and Networking Event
Sheppard Mullin, Washington D.C., 12.05.2019

Practices

Corporate
Governmental
Healthcare

Industries

Healthcare

Education

J.D., Indiana University, 1984

B.A., Hope College, 1981

Admissions

District of Columbia