

## False Claims Act - 2025 Mid-Year Update

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**PRACTICES** Healthcare and Life Sciences, Litigation, False Claims Act and Qui Tam Defense

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The False Claims Act continues to be one of the most commonly used weapons in the government's enforcement arsenal to address various forms of fraud. In addition to our "[Year in Review](#)" publication providing an overview of the previous year's developments, we are issuing a "Mid-Year Update" for the first time to highlight some of the key developments relating to the FCA from the first half of calendar year 2025. They include:

- The government announcing its intent to use the FCA to target new enforcement areas, such as customs fraud and illegal discrimination.
- Congress enacting a new law that significantly expands the types of false claims federal agencies can pursue administratively.
- Continued judicial efforts to interpret the substantive elements of an FCA claim, including what it means for a claim to be submitted "knowingly," what it means for noncompliance or a violation to be "material," and what it takes to plead a claim with particularity under Rule 9(b)'s heightened pleading standard.
- Significant judicial decisions regarding whether reimbursement requests for a government program administered by a private corporation constitute "claims," what requirements the government must satisfy to move to dismiss an FCA case over a relator's objection, and when an FCA claim "results from" a kickback violation, among other issues.

In the first half of 2025, Haynes Boone represented healthcare providers, defense contractors, and individuals in FCA investigations and lawsuits. We successfully resolved matters before lawsuits were filed, negotiated favorable settlements at all stages, and defended our clients in active litigation and appeals. We also advised many healthcare providers and contractors regarding FCA compliance and other related issues.

[View the False Claims Act - 2025 Mid-Year Review](#)

If you have any questions about the issues or cases covered in this Mid-Year Update, please let us know. We look forward to working with our friends and clients for the remainder of this year and beyond.