

# Health-Care Employers Must Strengthen Internal Compliance Programs to Respond to DOJ and SEC Enforcement Initiatives

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**PRACTICES** Government and Public Policy, Healthcare and Life Sciences

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Health-care organizations, physicians, and counsel should carefully reflect on the year 2015 and its health-care fraud and abuse policy implications moving forward. Several important enforcement actions and policy announcements demonstrated the necessity of increasing attention to internal compliance programs, including self-policing and reporting to regulators.

First, the U.S. Department of Justice (DOJ) issued a memorandum requiring its prosecutors to identify and prioritize the criminal accountability of individual executives and employees in corporate misconduct cases. Under the policy, corporations must disclose all relevant facts about individual misconduct to be eligible for cooperation credit.

Second, the DOJ's stated enforcement priorities against certain health-care fraud schemes indicated that a company may benefit from an internal compliance program with similar priorities.

**Excerpted from *Bloomberg BNA Health Law Reporter*. This article is a winning entry in the 2016 Bloomberg Law Write-On Competition. To read the full piece, please [click here](#).**