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Bar Admissions
District of Columbia

Maryland

Pennsylvania

Court Admissions
Court of Appeals of Maryland

Court of Appeals of the District of Columbia

Supreme Court of Pennsylvania

Education
Case Western Reserve University School of Law (J.D., *summa cum laude*, 1994)

- Order of the Coif
- Case Western University School of Law Jackson B. Morris Scholarship
- *Case Western Reserve Law Review,* Notes Editor

University of

JULIE E. KASS

Experience

Julie E. Kass, a principal in the Ober|Kaler Health Law Group, focuses her practice on the fraud and abuse aspects of Medicare and Medicaid, including the federal Stark and antikickback laws, OIG exclusion authorities and civil money penalties. In addition, Julie is a leader in the firm's ACO working group, assisting various clients in navigating CMS' ACO rules and application procedures. She represents a variety of health care entities, including hospitals, large physician practices, physical therapy companies, and long-term care facilities.

Julie is among the country's leading authorities in the Stark and antikickback laws. She also has a deep knowledge of issues pertaining to Medicare coverage and reimbursement. Julie serves her clients with the belief that without knowing the fundamentals of reimbursement and how the money flows, it is difficult – if not impossible – to understand the incentives creating potential fraud and abuse issues in this complex regulatory environment. This knowledge also serves her well in helping entities create new models for hospital/physician integration, such as ACOs.

At the U.S. Department of Health and Human Services, Office of Counsel to the Inspector General, Julie was responsible for writing advisory opinions, fraud alerts and safe harbor regulations. This experience makes her uniquely qualified to guide her clients through the complex Stark and federal antikickback regulatory environment. She has helped her clients structure arrangements to fall within the in-office ancillary services exception and restructure arrangements to comply with the constantly changing regulations. She has successfully sought and received advisory opinions from the OIG on behalf of her clients. A highly collaborative and intuitive problem solver, Julie works tirelessly with her clients to develop solutions within the limitations of the broad prohibitions of these laws.

Julie also serves as defense counsel and in that capacity has helped clients to deal with unintended violations of the fraud and abuse laws. She regularly represents clients before the OIG and DOJ in resolving civil money penalty administrative actions. In addition, she has assisted with internal investigations of Stark and antikickback issues for major health care systems. Clients often seek Julie's guidance in determining how to remediate the issues, including assistance with voluntary disclosures to the OIG.

Julie has authored many articles for professional journals, including several in-depth examinations of Stark regulatory compliance and self-referral prohibitions. Most recently, she authored "Fostering Health Care Reform through a Bifurcated Model of Fraud and Abuse Regulation."

Well-known as one of the nation's leading attorneys in the field of fraud and abuse laws, *Nightingale's Healthcare News* named Julie as one of the "Outstanding Fraud and Compliance Lawyers" for 2006 and one of the "Outstanding Young Healthcare

Pennsylvania (M.A., 1991)

University of Pennsylvania (B.A., *cum laude*, 1991)

Lawyers" for 2004.

Professional Memberships

- American Bar Association
- American Health Lawyers Association
  - Physician Organizations Practice Group
    - Chair, 2013-2014
    - Vice Chair, 2009-2012
  - Fraud & Abuse Practice Group
    - Advisory Opinion Task Force
  - Mentoring Program
  - Public Interest Contributor

Honoraries

- Listed in *The Legal 500,* 2012
- Selected by *Nightingale's Healthcare News* as one of the Outstanding Fraud and Compliance Lawyers for 2006
- Selected by *Nightingale's Healthcare News* as one of the Outstanding Young Healthcare Lawyers for 2004

Professional Background

- Formerly Senior Counsel, U.S. Department of Health and Human Services, Office of Counsel to the Inspector General, Industry Guidance Branch

Publications & Presentations

- Presenter, "Fraud and Abuse Update," Annual Health Law Forum, Tennessee Bar Association, 2012, 2013
- Presenter, "The Ins and Outs of Exclusion and Revocation," Annual Meeting, American Health Lawyers Association, 2013
- Presenter, "The Anatomy of Physician Integration-- Part III: Fraud and Abuse," Physician Organizations Bootcamp Webinar and Roundtable Discussion Series, American Health Lawyers Association, 2013
- Presenter, "A 12-Step Program to Better Compliance: A Practical Approach," Physicians and Physician Organizations Law Institute, American Health Lawyers Association, 2013
- Presenter, "The Stark Battle: Outside Counsel and Compliance – A Team Approach," Fraud and Compliance Forum, American Health Lawyers Association, 2012
- Presenter, "Nuts and Bolts of Accountable Care Organizations," Annual Meeting, American Health Lawyers Association, 2012
- Co-author with John S. Linehan, "Fostering Healthcare Reform through a Bifurcated Model of Fraud and Abuse Regulation," *Journal of Health & Life Sciences Law*, 2012
- Co-presenter, "Stark Law: Soup to Nuts," Healthcare Fraud and Abuse Bootcamp Webinar Series, American Health Lawyers Association, 2012
- Co-presenter, "Beyond the Cover Story Part 2: The Final ACO Regulations," Webinar, Ober|Kaler, 2011
- Co-author, "CMS Provides Final Framework for ACO and Shared Savings Program Rules: ACO Participants Get Greater Flexibility," Ober|Kaler ACO Update, 2011
- Co-presenter, "Bradford Case's Impact on Hospital-Physician Arrangements," American Health Lawyers Association, 2011

- Co-presenter, "ACO Formation and Implementation from the Physician Perspective, With Comments from the Hospital Perspective," American Health Lawyers Association, 2011
- Co-presenter, "Fraud and Abuse Fundamentals, Part I: Anti-Kickback," American Health Lawyers Association, 2011
- Speaker, "What Physician Counsel Need to Know about Healthcare Reform," Physicians and Physician Organizations Law Institute, American Health Lawyers Association, 2011
- Co-presenter, "Beyond the Cover Story: A Focused Overview of the Key Provisions of the ACO Regulations," Webinar, Ober|Kaler, 2011
- Co-author, "CMS Proposal Provides Framework for ACO and Shared Savings Program Rules," Ober|Kaler ACO Update, 2011
- Presenter, "What Physicians Should Know About Healthcare Reform for Their Practices," American Health Lawyers Association, 2010
- Co-presenter, "The Changing Face of Physician Practice Models after Healthcare Reform," Healthcare Reform: The Law and Its Implications Conference American Health Lawyers Association, 2010
- Co-presenter, "The New Reality of Stark Self-Disclosures: What to Do and Not Do," American Health Lawyers Association, 2010
- Co-presenter, "Stark in the Dark and Out of the Closet: The Discovery of Unintentional Violations and the New Potential for Voluntary Disclosure," AHLA/HCCA Fraud and Compliance Forum, 2010
- Presenter, "Medicare Changes on the Horizon: Assessing the Potential Impact on Labs, Pathologists & Imaging Providers," G2 Intelligence, 2010
- Presenter, "Medicare Changes in the Works: What They Mean for Labs, Pathologists, and Diagnostic Imaging Providers," Webinar, Washington G-2 Reports, 2009
- Co-author with Joshua J. Freemire, 'Concierge' Medicine – Best Practices and Common Pitfalls," *Health Law Handbook,* 2009
- Presenter, "Stark Provisions in 2009 Inpatient Prospective Payment System Rule Will Lead to Major Changes for Physician Joint Ventures," American Health Lawyers Association, 2009
- Presenter, "Physician Self-referral: The Year in Review," Fraud & Compliance Forum, American Health Lawyers Association, 2008
- Presenter, "Remaining Compliant: What PTs Need to Know," American Physical Therapy Association, 2008
- Presenter, "Stark in 2008 and Beyond," Tennessee Bar Association, 2008
- Presenter, "Concierge Medicine; How to Do it and Stay Out of Trouble; Best Practices & Common Pitfalls," Society for Cardiovascular Angiography & Interventions, 2008
- Presenter, "Key Regulatory Issues for Healthcare Transactions," First Annual Southwest Healthcare Transactions Conference, Renaissance American Management, Inc. & Beard Group, 2008
- Presenter, "The Future of In-Office Ancillary Services," American Urological Association, 2008
- Presenter, "Stark Law Straight From the Top," New Hampshire Bar Association, 2008
- Author, "Proposed Rule Requires Physicians and Non-Physician Practitioners to Enroll as IDTFs," *Payment Matters,* 2008
- Co-author with William T. Mathias, "Big Changes to physician Diagnostic Testing Under 2008 Medicare Physician Fee Schedule," *G-2 Compliance Reports,* 2008
- Author, "Far Reaching Implications for Physician Diagnostic Testing Arrangements

Under the 2008 Physician Fee Schedule Rule," *Payment Matters,* 2007

- Author, *Health Law Handbook* 2007 Edition, Chapter 10: "Distinctions Without Differences: An Examination of Protected and Prohibited Physician Ownership Arrangements Under the Stark and Anti-Kickback Statutes," 2007
- Co-author with William T. Mathias, "Stark II, Phase III Final Regulation: Changing the Compliance Landscape," *G-2 Compliance Reports,* 2007
- Co–author with William T. Mathias, "2008 Medicare Physician Fee Schedule: Stark Physician Self-Referral Provisions & Related Policy Changes," *G–2 Compliance Report,* 2007