

A Look at a First-of-Its-Kind Life Sciences & Healthcare Consulting Group Within a Law Firm



Roy Snell is the co-founder and former CEO of the Health Care Compliance Association and the Society of Corporate Compliance. Roy is also the author of *IntegrityWorks* and the *Accidental Compliance Professional*.

This issue's interview was a first for us in that we interviewed three separate members of Paul Hastings LLP. The interviewees answered some of the questions individually, and some were discussed as a group. We hope you enjoy this informative discussion of life sciences and healthcare issues and compliance, and how consultants and attorneys work together to serve the needs of their clients.

Gary Giampetruzzi is a partner in the firm's litigation department and chair of the Litigation Life Sciences practice. BJ D'Avella is the group leader and founder of the Life Sciences & Healthcare Consulting Group. Dhara Satija is a managing director of the firm's Life Sciences & Healthcare Consulting Group.

Snell: Thank you all for agreeing to be interviewed. My first question is for all of you. Please tell me about Paul Hastings' broader life sciences and healthcare platform.

Group: Our global life sciences and healthcare platform offers comprehensive transactional, regulatory, and litigation counsel and consulting services to companies at all stages in their life cycle. The cross-disciplinary team is comprised of industry-recognized lawyers and consultants with former in-house and government experience as well as advanced technical degrees in life sciences, healthcare, business management, engineering, and chemistry.

Most recently the platform has broadened and deepened its offerings with the arrival of additional partners who provide legal services in the areas of privacy, FDA regulatory, intellectual property, emerging companies and venture capital, antitrust and private equity, adding invaluable industry knowledge and insight.

Snell: Gary, we share 455 connections on LinkedIn. Many of these individuals are practicing compliance

and ethics professionals. Please describe some of the characteristics and traits of compliance and ethics professionals that you think make them successful and effective in their jobs. Please share with our readers what interpersonal skills are most important for success. Also, what education or work experience is most helpful? And finally, if you could only gather information on the interpersonal skills, educational background, or work experience of an individual prior to hiring for a compliance and ethics job, which one of those three categories of information would you ask for information on?

Giampetrucci: The characteristics of an effective compliance professional are not really all that different from the characteristics of any other effective gatekeeper in an organization. While there may be certain more nuanced characteristics to fulfill the role more effectively, at the core, an effective compliance professional needs to have sufficient awareness of the needs of his or her stakeholders and the organization that he or she serves. That awareness, coupled with EQ, is necessary to be able to navigate the inevitable myriad issues presented day in and day out with no clear path at times, but solutions are nonetheless needed.

It is cliché to speak in terms of being a business partner in a compliance role. Perhaps it's more about being an organizational partner. When you think about the compliance role being tagged as a police role, which it should never be, it is certainly about problem solving rather than just problem generation.

The people most likely to be able to fulfill this role effectively are those with the inherent capabilities (that's just a reality, in my opinion, no different than some athletes having better genes for their jobs than other athletes), as well as those with broad ranges of experience—people who over the course of their careers have flexed into different directions and gained the different kinds of experiences that enable

them to be more effective, more holistically, than others. There is no substitute for environmental shaping, done right.

Snell: Gary, you are on the board of HERhealthEQ. Please tell us a little bit about that organization and how that experience has helped you gain a different perspective on how healthcare operates. I moved around quite a bit during my career and I did some volunteer work. It seemed to me that gaining different perspectives really helped later on in my career. What would you tell younger people about seeking those kinds of opportunities to broaden their perspective and increase their learning experience?

Giampetrucci: HERhealthEQ, established in 2016, was born out of a need to reduce the equity gap in access to healthcare for women around the world. The CEO and founder, Marissa Fayer, is a trailblazer who is making a tremendous difference and I am honored to be part of it. What began as a singular donation of a mammogram machine to a Costa Rican hospital, has now grown into an international web of healthcare solutions. The goal is simple: we need to have fewer women face the choice between their own healthcare and putting food on the table for their families. HERhealthEQ does that and obviously focuses a lot of its efforts in developing countries by expanding access to medical devices and equipment to create an equitable standard of care. I sit on the board, and Paul Hastings provides corporate, compliance and other support to these efforts. I'm beyond proud to play a small part in this. For junior and senior people alike—and I recognize how busy we all are with our jobs and personal lives—we can make a big difference. It takes all of us, and it is well worth it.

Snell: Gary, please tell us a little bit more about your role at Paul Hastings as the Chair of Life Sciences Litigation. What sort of services does your group provide?

Giampetrucci: After spending 14 wonderful years at Pfizer, I now find myself in year 14 at Paul Hastings. It has been an incredible journey thus far and I've seen the firm climb the ranks to become one of the most successful firms in the world. I have also seen the Life Sciences practice, which was a bit more nascent when I joined the firm in 2013, increasingly become a more dominant force across all disciplines.

The most enjoyable part of my role as a partner in a major law firm at this later stage of my career is helping orchestrate, along with our incredible Chairman of the firm, Frank Lopez, and others, and bring together in a very deliberate and thoughtful fashion the right pieces to make this a most complete and unprecedented life sciences practice offering.

While my own personal practice has long focused on compliance, investigations, and government defense, in recent years, through the leadership of Frank and others, the firm has been able to attract incredible talent from the top law firms and practices around the world. Paul Hastings and Paul Hastings Life Sciences and Healthcare have become a destination. We increasingly have some of the best lawyers in the capital markets, corporate transactions, private equity and regulatory spaces, as well as AI, cyber security and privacy, to support the ever-changing needs of companies in the life sciences and healthcare sectors.

When I joined Pfizer in 2000, Doug Lankler, now the company's long-time general counsel, and I had an understandably more modest compliance program and organization. When I left the company almost 14 years later, it was incredibly satisfying to see Pfizer have arguably the best compliance department and program not just in the life sciences sector, but across industries. Now, 14 years later at Paul Hastings, I see the same thing. I see life sciences and healthcare practice

offerings that work holistically together to provide an incredible level of support and partnership with the very best clients, small and large, in the United States and globally.

Snell: Gary, you are part of the program faculty at Seton Hall Law School. What can you tell us about the interests and perspectives of the current generation of students? What are their concerns? How is their perspective different from someone who has spent many years in the workplace?

Giampetrucci: I think that the interests, if not the perspectives, of the students at Seton Hall Law School today are probably not a whole lot different from those of the students in the past. The students associated with the healthcare compliance program that I have taught for somewhere between 15 and 20 years are the same type of students thirsting for learning, albeit in a fairly new curriculum built around a relatively new area of expertise known as corporate compliance.

The Seton Hall Law School Healthcare Compliance Program, currently led by Jake Elberg, a former federal prosecutor out of the District of New Jersey, is among the best baseline and advanced offerings in the compliance arena. Students benefit tremendously from hearing from us instructors, but alongside former federal regulators and prosecutors and industry insiders alike. I'm truly thankful to my sector industry peers who take the time to co-teach these courses with me.

In terms of the concerns of the students of today, I would guess that they are not a lot different from the concerns we all shared back in the day. They want to succeed in school. They want to develop meaningful careers, perhaps more so than just making money, and want to make a genuine difference. To the extent they are attending this healthcare compliance

program, they obviously have a particular interest and have likely found what they most want to do. Life sciences and health-care is a special sector to those operating in it.

Snell: And finally, Gary, as a former compliance professional and current lawyer at Paul Hastings, what one piece of advice would you give compliance professionals to help them be more successful?

Giampetrucci: If I were to give compliance professionals just one bit of advice, I would go back to the work I did with former New York Governor Mario Cuomo in the 1990s when I was an associate at an international law firm.

When I was leaving law firm life for the first time, and joining the incredible Pfizer organization to help Doug Lankler establish a best-in-class compliance organization, Governor Cuomo gave me some simple but important advice for that next step in my professional journey. Among other things, he advised me to take the time and get to know the organization as deeply as possible—to get to know what the company does, who does it, and their needs. Only then, he advised, would I have any chance of being an effective partner in the compliance role in that organization.

He also advised me to keep my mouth shut unless I had something intelligent to say, but that was a fair enough point! I think that advice still holds true. It takes time and energy to get to know your company, your colleagues, and their needs, but doing so will most certainly enable you to be more effective.

Snell: BJ, you helped launch the Life Sciences & Healthcare Consulting Group for Paul Hastings in 2020. That was a challenging time to start. They say what doesn't kill you makes you stronger. How are you stronger from starting with the group during COVID? What did you learn from that experience?

D'Avella: Launching the Life Sciences and Healthcare Consulting Group during COVID was definitely a challenge, but in hindsight it really accelerated our growth in ways that would have taken far longer under normal conditions.

We were offering a new value proposition at a moment when our clients faced unprecedented operational disruption, heightened regulatory scrutiny (the U.S. DOJ announced a near-record \$5.6 billion in False Claims Act settlements during our first year of existence), and significant uncertainty about what “normal” would look like going forward. That environment forced clarity very quickly—about our purpose, our model, and how we needed to show up for clients.

The urgent new challenges our clients faced also helped us work more quickly and with greater focus on integrating the consulting and legal teams' ways of working together. As our clients' questions and needs unfolded in real time, the time and effort required to coordinate among outside legal and consulting advisors and managing handoffs between separate firms became a luxury that they could do without. Our being embedded within the firm's broader life sciences and health-care platform enabled us to operate as one coordinated team from the jump—consultants and attorneys working side by side to help clients make decisions quickly, defensibly, and with an eye toward both immediate risk management and long-term operational excellence.

Our consulting roots meant we were comfortable moving quickly and nimbly from strategy to implementation, while the firm's best-in-class legal depth ensured that execution was aligned with regulatory expectations and enforcement realities. Starting during COVID relied upon and reinforced the immense values of trust, collaboration, and transparency—both internally and with our clients. That mindset has stayed with us as we've grown and as the firm has continued to invest in

a comprehensive life sciences and health-care platform. The result was, and continues to be, a team that is comfortable operating in uncertainty and well-positioned to help life sciences and healthcare compliance leaders navigate whatever comes next.

As a more practical matter, prior to COVID, we would have had to go on a long “road show” to meet with existing and prospective clients to discuss this new value proposition and work with them to help solve their problems. Instead, with Zoom, the instantly-preferred “socially distant” mode of meetings, we filled our calendars with live face-to-face discussions. And with calendars generally empty as our friends and colleagues adjusted to the new normal, it wasn't difficult to achieve both broad reach and conversational depth. This was true both in terms of market development for our services and in terms of recruiting.

Snell: BJ, we share an interesting background together. We both worked for Deloitte and PriceWaterhouseCoopers. You had the additional experience of Huron consulting. Tell us a little bit about the difference between large firms versus smaller firms and consulting firms versus law firms. What are some of the advantages and disadvantages related to size and type of organization when providing products and services to customers?

D'Avella: Having worked across large global consulting firms, boutique advisory practices, and now within a top global law firm, I've seen firsthand that size and structure each bring real advantages—and real tradeoffs—when serving clients. Large organizations offer scale, depth, and institutional credibility, but they can sometimes struggle with agility. Smaller firms can move quickly and innovate, but may lack the breadth needed to support clients as issues evolve or escalate.

The same dynamic exists between traditional consulting firms and law firms. Consultants are trained to diagnose problems, design solutions, and help organizations navigate change. Law firms like Paul Hastings bring deep legal judgment, regulatory insight, and experience navigating enforcement and investigations. Historically, clients had to choose between the two—or hire both separately—and manage any incongruities or inefficiencies themselves.

What's compelling about our model is that it intentionally combines the strengths of the respective models and practitioners without forcing convergence where it doesn't belong. Consultants are thriving as consultants, attorneys are thriving as attorneys, and we deliver to our clients as one integrated team. That structure allows us to bring the right expertise at the right moment, without duplication or artificial boundaries.

Being part of the firm's broader life sciences and healthcare platform matters here as well. As clients grow, enter new markets, adopt new technologies, or face increased scrutiny, their needs change. Our comprehensive platform approach empowers us to support clients across that lifecycle—from compliance program design to regulatory strategy to high-stakes investigation defense—without disrupting relationships or having to start from scratch. For life sciences and healthcare compliance leaders that translates into continuity, efficiency, and advice that is both practical and defensible should enforcement bodies ever come calling.

Snell: BJ, I learned quite a bit when I was a consultant about how some clients were able to effectively use consulting services and how others did not seem quite as efficient or effective in their role as the client. If you were to move in-house, what sort of principles would you take with you as you work with outside consultants and

attorneys? How would you make sure that the engagement was as effective as possible as a client?

D'Avella: In full disclosure, I've never been on the in-house side of the table, so I may not be the best suited to answer this question. But I'll take a shot. If I were sitting in-house today, the principles I'd bring to working with outside consultants and attorneys would be grounded in clarity, alignment, and accountability. The most effective engagements I've delivered have started with a shared, holistic understanding of the problem to be solved, rather than just the work to be performed. When consultants and attorneys are aligned with the client on what the problem is and how to solve it, clients can spend less time managing their advisors and more time leading their organizations.

In practice, that means being explicit about objectives, roles, key assumptions, and decision-making authority before the engagement letter is signed. Too often, inefficiency can creep in when separate advisors operate in parallel or when legal and compliance practitioners aren't aligned on such items. I'd prioritize working with risk management partners who are comfortable collaborating across disciplines, who understand how their work fits into my broader business objectives, and who share my values—including having a good sense of humor, which (when flexed appropriately) helps lighten the mood in the face of what can often be very serious subject matter.

I'd also prioritize working with advisors who are willing to move beyond advice into action. I'd look for project teams that understand the realities of compliance leadership and practicalities of turning advice and ideas into repeatable action. GCs and CCOs balance regulatory expectations, business objectives, and resource constraints every day; the least our advisors can do is both understand that and

act upon that understanding. The value of Paul Hastings' integrated life sciences and healthcare platform is that it improves our ability to do so across all functional areas within a given company—from early stage, pre-commercial companies to the largest companies in the world.

Snell: BJ, you have been very active in your community. You have been an Assistant Fire Chief, President/Trustee, Councilman and a Treasurer in four different organizations. How would you explain to someone in their 20s or 30s about these sorts of volunteer experiences and why they might consider doing something similar? What did you learn from volunteering that you don't think you got during your education or work life experience?

D'Avella: My leadership and volunteer roles in the Essex Fells community—where I had the good fortune of growing up—have shaped how I think about leadership in ways that formal education and professional experience alone never could have. Serving in volunteer roles teaches accountability in a very real sense. Whether leading in my role as an officer at the fire department as we put out a neighbor's house fire, or making critical decisions that impact the consistent delivery of clean water to the families in town, I've been responsible for very real outcomes that affect my friends and neighbors' lives in tangible ways—often with limited resources and no margin for error. As difficult and complex as some of my clients' issues can be to solve, experiences like those I've had in town can make some client issues seem relatively easy to solve in comparison.

For someone in their 20s or 30s, I'd describe these experiences as opportunities to develop judgment under pressure. I've learned how to make important decisions with incomplete information, how to communicate clearly and effectively in high-pressure situations, and

how to earn trust without relying on title or authority. Those skills translate directly into my professional life, particularly in fields like compliance and risk management.

Volunteer leadership also reinforces the importance of service—something that's been inculcated in me from a very young age. The Benedictine monk that married my wife and me was someone I'd known since I was twelve years old. He was a legendary leader at my school and had a favorite saying—"The Other Guy First"—which he used to hand out on printed cards. He's since passed, but I still have the card he gave me with that saying on it; it sits on my desk, and I look at it multiple times each day. It serves as a brilliant reminder each time I see it that while it's easy to focus on expertise, titles, or credentials, leadership is ultimately about responsibility to others. That perspective carries into how you build teams and serve others in both professional and community contexts—especially during challenging times.

Within our consulting group and the broader life sciences and healthcare platform here at Paul Hastings, that mindset matters. Our clients often come to us during critical moments for their companies, so approaching those engagements with humility, accountability, and a service-oriented mindset helps ensure we're not just solving problems, but supporting leaders who are making consequential decisions for both themselves and those with whom they work.

Snell: BJ, I ran an organization for 20 years and felt that marketing was one of our top five keys to success. I had difficulty convincing others how important marketing was. You have an MBA in marketing from Georgetown. How would you describe the importance of marketing to the success of a group within an organization and the organization has a whole?

D'Avella: Marketing is often misunderstood as promotional gimmickry when in reality it's about fostering clarity and building trust. At its best, marketing helps an organization articulate who it is, what it stands for, what it delivers, and how it creates value—internally as much as externally. Clarity and trust are essential for growth, particularly within complex organizations like a global law firm with a consulting practice embedded within it.

For our consulting group, marketing as defined above has played a critical role in alignment with and augmentation of the broader firm platform. It helps new partners and their inbound teams understand how we can work together to execute the firm's broader strategy in life sciences and healthcare and enables collaboration across practices. When people share a common narrative about who you are, what you stand for, and what you deliver, it becomes easier for everyone to identify opportunities, serve clients as one team, and invest in the right capabilities.

At the organizational level, effective marketing ensures that our clients experience Paul Hastings as a platform rather than a collection of silos. In life sciences and healthcare, where issues often span regulatory, compliance, privacy, transactional, and enforcement considerations, that coherence matters. Clients want partners who understand their unique circumstances within the industry and can anticipate their needs—rather than just reacting to them.

For our consulting group, marketing has helped communicate a simple but powerful idea: that integrated legal and compliance services can be delivered more efficiently and more effectively under one roof. As the firm's life sciences and healthcare platform has expanded significantly over the past couple of years, that message has resonated because it reflects how clients actually want to engage with us. In that sense, marketing hasn't been

an “add-on”—it’s been an intentional, strategic enabler of our rapid growth in the marketplace.

Snell: Dhara, you have five different certifications, including two of my favorites, Certified in Healthcare, Compliance and Certified Fraud Examiner. You also have a certification in project management from Harvard. It seems like a wonderful diversity of certifications. Please tell us a little bit about why you think certifications are helpful and tell us about a couple of the certifications that you feel are most helpful in your current role.

Satija: I have always viewed certifications as more than credentials—they signal a commitment to the profession and to continuous learning in a field that is constantly evolving. Healthcare compliance and risk management are complex and dynamic, and certifications help establish a shared foundation of knowledge, ethical standards, and industry best practices that benefit not only the individual, but also the organizations and clients we serve.

Two certifications that are particularly helpful in my current role are the Certified in Healthcare Compliance (CHC) and the Certified Fraud Examiner (CFE). The CHC provides a strong foundation in compliance program design and regulatory frameworks. The CFE complements that foundation by sharpening the investigative and analytical lens I bring to client engagements.

As we collaborate with clients to design and enhance compliance and risk programs, our approach is grounded in operational reality—not just how programs look on paper. A risk-based, practical mindset resonates with compliance leaders who are balancing regulatory expectations, operational challenges, business realities, culture, and talent.

Being part of a broader life sciences and healthcare platform also allows us to

collaborate closely with legal colleagues in litigation, enforcement, and investigations. Continuous learning, on-the-job experience, and formal education together support the integrated, holistic approaches we bring to our clients every day.

Snell: Dhara, you were a Residence Assistant (RA) at the University of Massachusetts Amherst. I too was a Residence Assistant in college. I don’t think people really understand how great an experience being an RA is. It’s particularly helpful to have a decent amount of responsibility for “managing people” at such a young age. I brought a lot of that experience and hard lessons forward into my career. What do you recall from that experience and what you learned as an RA. Would you advise young people to seek out that opportunity?

Satija: Being an RA was one of the most formative leadership experiences of my early career. It handed me real responsibilities at a very young age. Similar to the challenges faced by our healthcare compliance leaders, you are not managing hypotheticals—you are managing people, expectations, conflict, change, safety, reputation, and uncertainty, often with incomplete information and in real time.

What stands out most is how quickly I learned that there is no single approach to managing people or solving a problem or challenge. People management is a critical and crucial component of my role then and now. As an RA, one is responsible for individuals with different personalities, backgrounds, stressors, and communication styles. You are often navigating situations where emotions are high and the “right” answer is not immediately clear. This forces you to think critically, manage ambiguity, assess risk, weigh pros and cons, and make judgement calls while balancing empathy, accountability, and expectations. These are skills I am grateful to have learned early on as they

are still required daily in my role at the firm and in my role as the chapter president of a not-for-profit healthcare industry organization (the MA-RI chapter of the Healthcare Financial Management Association (HFMA)).

All the roles I have performed to date (RA, not-for-profit board member/officer, and consulting leader) reinforce the importance of leading by example. One's credibility is not based on authority alone—it is earned through consistency, integrity, competence, and clear communication. The awareness from others watching how you handle pressure, conflict, mistakes, failures and successes shapes how you show up as a leader later in your career. I strongly encourage young leaders to seek out opportunities like being an RA or getting involved in a leadership role for a not-for-profit organization.

The foundational skills developed from these experiences are very relevant to the work I do in healthcare compliance and risk management today, where navigating gray areas, managing difficult situations, critically thinking through a challenge, strategically leveraging opportunities, and being a trusted partner are essential.

Snell: Dhara, please tell us a little bit about your Managing Director role at Paul Hastings. Tell us about the Life Sciences and Healthcare Group. What is your favorite part of being on this team?

Satija: Our first-of-its-kind consulting group within the law firm serves life sciences and healthcare clients by working both independently and arm-in-arm with our top-tier legal colleagues to design, build, implement, and operate effective compliance and risk management programs—as well as the organizational constructs, data analytics, and resource models that support those programs across the enterprise.

In my current role as Managing Director, I lead our healthcare consulting services for

hospitals, health systems, physician practices, healthcare investors, and healthcare products/service providers. I support clients in enhancing, developing and implementing compliance programs especially in response to government resolution activity, such as Corporate Integrity Agreements. Our work includes compliance audits, investigations, and corrective action plans and collaboration with legal teams on government inquiries, self-disclosures, and litigation matters. A key focus of my role is driving cross-practice collaboration across litigation, data privacy, cybersecurity, antitrust, corporate, and private equity to deliver integrated solutions to our clients.

I also co-lead a number of our integrated risk management, investigation, and litigation projects for medical device and life sciences clients. One of our differentiators is our integrated risk management (iRM) methodology. Too often, risk assessments occur in silos across compliance, privacy, quality, internal audit, and cybersecurity. We focus on aggregating risk inputs across verticals, creating and aligning governance structures, and translating those insights into enterprise-level decision-making. When done well, risk management becomes strategic rather than reactive.

One initiative I particularly value is co-leading our Medical Device Working Group, where legal and compliance leaders share insights, benchmark practices, and collaborate on industry challenges. My favorite part of this role is the people—our team and our clients. I am energized by leading through change, aligning teams around purpose, and partnering with clients to navigate complex regulatory environments and evolving business opportunities. The variety, pace, and opportunity to build trust through collaboration are what motivate me most about consulting.

Snell: Dhara, please tell our readers about one of your most rewarding engagements

at Paul Hastings. We don't necessarily need to know the name of the client but rather why it was such a rewarding experience and what special connection did you make with the people involved? What did they do that was more effective as their role in the partnership? Why was it so effective? How was it different? What advice would you give to compliance professionals about their role in making sure that they have a rewarding experience with outside consultants and attorneys?

Satija: The most rewarding... that is a tough one. It is hard to just pick one as my overall experience at the firm has been very rewarding.

I was brought on by Gary and BJ to build and lead healthcare consulting services. I made a bet on myself and took on the challenge of stepping outside of the comfort of a traditional consulting set up (at my former employer, Deloitte) to explore a new model. There is uncertainty and risk in everything we do, but by leveraging my multidisciplinary consulting experience with a focused business development acumen I was able to establish trust, credibility, and a foundation for successful collaboration across the firm to dramatically increase our footprint in the marketplace.

Over the past 12 months I led the transformation of our healthcare services into one of our most dynamic offerings. I co-led efforts that secured numerous new healthcare clients—opening new paths to growth for the Consulting Group and the firm. Today, in addition to our core

Consulting Group services, our firm represents healthcare provider clients, including top 25 hospitals and health systems, in antitrust litigation, M&A transactions, data privacy and cybersecurity, employment law, private equity, corporate finance, and healthcare regulatory, compliance and litigation matters, and much more.

This success has been the most rewarding given impact, scale, and a true collaborative approach across our legal and consulting teams. We have a clear vision, goal, and purpose that has led to an effective execution and successful delivery of our services.

The most effective and rewarding engagements are grounded in transparency, collaboration, and shared commitment. We often support our clients in navigating significant regulatory scrutiny while also trying to strengthen their compliance and operational infrastructure. Our partnership is meaningful and effective when there is shared accountability. When clients partner with us early and remain engaged throughout the project life cycle, we see a lot of success in collaboration, level of trust and impactful results.

For compliance professionals seeking rewarding experience with outside consultants and attorneys, my advice is to invest in partnerships. Be clear about your objectives, provide context openly, and welcome candid feedback.

Snell: Thank you very much for your time. It was great to talk with all of you.

Reprinted from *Journal of Health Care Compliance*, Volume 28, Number 2, March–April 2026, pages 33–42, with permission from CCH and Wolters Kluwer.
For permission to reprint, e-mail permissions@cch.com.
