



## Sanford V. Teplitzky

Senior Counsel

Baltimore | 410.862.1100 | [steplitzky@bakerdonelson.com](mailto:steplitzky@bakerdonelson.com)

Sanford V. Teplitzky is a health care regulatory attorney, with a practice that has emphasis on fraud and abuse, and health care investigations.

Mr. Teplitzky represents large health care companies and delivery networks that rely on his experience and deep knowledge of the health care industry to identify and resolve fraud and abuse issues, and to represent them in federal and state investigations.

He advises medical professional and trade associations, negotiates with state and federal authorities, and provides counsel with respect to a broad range of regulatory and legislative issues facing health care clients.

Mr. Teplitzky's practice primarily focuses on fraud and abuse issues. He has extensive experience in the development and implementation of corporate compliance programs; internal reviews and investigations; due diligence reviews for acquiring and acquired entities; voluntary disclosures; and federal and state governmental investigations arising from False Claims Act whistleblower actions. He is recognized as one of the country's top attorneys on issues related to the federal Anti-Kickback Statute and the Stark Self-Referral Law.

His clients include hospitals (including for-profit, not-for-profit, chains and independent hospitals, as well as major academic medical centers), nursing homes, home health agencies, institutional and retail pharmacies, medical device manufacturers, and individual and large physician practices.

Noted by both clients and colleagues for his exceptional, consistent service, Mr. Teplitzky has been selected for BTI Consulting Group's Client Service All-Stars for Law Firms seven times. In 2013, he was named a "Client Service All-Star MVP."

Prior to entering private practice, Mr. Teplitzky served as an attorney for the Office of the General Counsel of the Department of Health, Education and Welfare, where he provided legal advice to the Health Care Financing Administration on fraud and abuse, reimbursement and other regulatory issues under the Medicare and Medicaid programs. Mr. Teplitzky had primary responsibility for developing policies and regulations to implement the Medicare and Medicaid Anti-Fraud and Abuse Amendments of 1977. Instrumental in working with members of Congress to create the OIG advisory opinion process, he is often credited with being the "father" of that process. As a representative of the American Health Law Association, Mr. Teplitzky worked with the OIG and other national organizations to develop guidelines for members of boards of directors with respect to health care compliance.

Mr. Teplitzky is a prominent member of numerous professional and civic associations. He has served on the board of directors of several Baltimore-area organizations, and served ten years on the Baltimore County Schools Board of Education. He is a former adjunct professor at the University of Maryland School of Law, where he taught a seminar on fraud and abuse for more than ten years.

### Representative Matters

- Handled dozens of OIG and CMS voluntary disclosures for both large and small clients on issues relating to the Anti-Kickback Statute, and Stark Law, as well as billing and other regulatory non-compliance.

- Served as a CIA compliance expert for a large publicly traded company pursuant to its Corporate Integrity Agreement addressing compliance with the CIA and more generally applicable laws.
- Negotiated numerous settlement agreements under the Federal FCA on issues related to the Anti-Kickback Statute, Stark Law and other health care fraud allegations, including billing and reimbursement issues.
- Negotiated dozens of corporate integrity agreements with the OIG.
- Active in creating and implementing corporate compliance programs, in addition to developing a program for clients to conduct corporate compliance effectiveness reviews.
- Counseled multiple clients relating to the application to propose transactions, including contractual relationships and joint ventures, and specifically, any implications under the Anti-Kickback Statute or Stark Law.
- Led multiple due diligence efforts for clients acquiring and being acquired, with a specific focus on health care compliance and fraud and abuse issues.
- Worked as the AHLA representative to the workforce with the OIG and other national organizations to develop guidelines for members of boards of directors with respect to health care compliance.
- Instrumental in working with members of Congress to create the OIG advisory opinion process – credited with being the "Father of that process."
- Led the health care regulatory and compliance due diligence efforts for a national health care system's \$1.1 billion acquisition of an ambulatory surgical center (ASC) development company and over 80 individual ASCs.



## Professional Honors & Activities

### Professional Memberships

- Member – American Bar Association
- Member – [American Health Law Association](#)
  - Founding Fellow (2005)
  - Chair, Fraud and Abuse Program (1992 – 2000)
  - Board of Directors (1986 – 1995)
  - President (1993 – 1994)
  - Mentoring Program
  - Public Interest Contributor
- Member – Maryland State Bar Association

### Community Service

- Simon Wiesenthal Center
  - Board of Trustees (2022 – present)
  - Recipient (along with wife, Karen) – Spirit of Courage Award
- Member – Baltimore Jewish Council (1982 – present)
  - Board of Directors
  - President (1992 – 1994)
- Member – The Jewish Federations of North America
  - National Health and Long Term Care Work Group
  - Co-Chair (2012 – 2015)
- Adjunct Professor – University of Maryland School of Law (2005 – 2014)
- Board of Directors – Baltimore Reads (2009 – 2014)
- Board of Directors – Homeless Persons Representation Project
  - Chair of the 2012 and 2013 Annual Campaigns to End Homelessness
- Special appointment to the inquiry panel investigating the financial practices in the Baltimore City Public School System, 2004
- Member – Baltimore County Board of Education (1993 – 2003)
- Board of Directors – Center for Poverty Solutions (1998 – 2000)

- Member – Action for the Homeless (1995 – 1998)
  - President (1989 – 1992)

### Honoraries

- Fellow – Maryland Bar Foundation
- Listed since 1991 in *The Best Lawyers in America*® for Health Care Law
- Listed in *Maryland Super Lawyers*, Health Care (2007 – 2024)
- Listed in *Chambers USA* as a leading Health Care lawyer in Maryland (2008 – 2024); Health Care lawyer Nationwide (2011 – 2019)
  - Recognized as a "Star Individual" (2016 – 2020)
- Listed in *Who's Who Legal* in Healthcare (2020)
- Listed in *The Legal 500* (2012, 2014, 2015), "Leading Lawyer in Health Care" (2015)
- Listed in BTI Consulting Group's *Client Service All-Stars for Law Firms* (2008 – 2013, 2015, 2020, 2022)
- Listed in *Expert Guides to the Leading Lawyers – Best of the Best USA*, Healthcare Category (2007, 2011 and 2013 – 2014)
- Selected by *Nightingale's Healthcare News* as one of the "Outstanding Fraud & Compliance Lawyers" (2004 and 2009)
- Recipient – David J. Greenburg Award, American Health Law Association (2008)
- Recipient – Leadership in Law Award, *The Daily Record* (2005)
- AV® Preeminent™ Peer Review Rated by Martindale-Hubbell



### Professional Background

- Office of the General Counsel of the Department of Health, Education and Welfare



### Publications

- "CMS Approves New Group Information Form under Self-Referral Disclosure Protocol," republished March 7, 2023, in *Physicians Practice* (March 2023)
- "OIG Issues Favorable Advisory Opinion for Hospital's Provision of Nurse Practitioner Services" (January 2023)
- "CMS Requests Comments on Proposed Changes to Stark Law Self-Referral Disclosure Protocol Forms" (July 2022)
- "Baker's Dozen – Tips and Insights on Partnering to Advance Women," *Women's Initiative Newsletter* (October 2021)
- Co-author – "The False Claims Act – What to Expect," *AHLA Weekly* (April 2017)



### Speaking Engagements

- Presenter – "The Legacy of Enforcement of the Anti-Kickback Statute," ABA Healthcare Fraud Institute 2024 (May 2024)
- Presenter – "GS4 Anti-kickback Statute 50 Year Anniversary," Health Care Compliance Association Healthcare Enforcement Compliance Conference (November 2023)
- Presenter – "Regulatory Fraud and Abuse Update," 33rd Annual Tennessee Bar Health Law Forum, Virtual (October 2021)
- Presenter – "Stark Law: Compliance Challenges," Illinois Association of Healthcare Attorneys (IAHA) 36th Annual Health Law Symposium (November 2018)
- Presenter – "2018 Update on Fraud and Abuse Developments," 30th Annual Tennessee Bar Association Health Law Forum, Nashville, Tennessee (October 2018)
- Presenter – "Self-Disclosure Assessment in the Era of the 60 Day Rule: No Good Deed Goes Unpunished," Illinois Association of Healthcare Attorneys (IAHA) Quarterly Lecture, Chicago, IL (December 2017)

- Presenter – "Avoiding Criminal and Civil Liabilities for Overpayments," HCCA'S 3rd Annual Healthcare Enforcement Compliance Institute, Washington, D.C. (October 2017)
- Presenter – "The Stark Law: What Has Changed, What Remains the Same, and What Might Come Next," ABA Health Law Section 2017 Physicians Legal Issues Conference (June 2017)
- Presenter – "Trends in Current Health Care M&A Deals: An Update from the Field," Evolution of a Health Care Deal, Ober|Kaler and Bloomberg BNA (2016)



## Education

- Tulane University School of Law, J.D., 1975, with honors
  - Associate Editor – *Tulane Law Review*
- Washington University, A.B., 1972



## Admissions

- Illinois
- Maryland
- Court of Appeals of Maryland
- U.S. Court of Appeals for the District of Columbia Circuit
- U.S. Court of Appeals for the Eleventh Circuit
- U.S. Court of Appeals for the Fourth Circuit
- U.S. Supreme Court