

Frank A. Mazzagatti Explains the Benefits of the DOJ's Healthcare Fraud Self-Disclosure Policy

In Modern Healthcare

In The News | 1 min read

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Hinshaw partner Frank A. Mazzagatti was quoted in a *Modern Healthcare* article discussing the US Department of Justice's (DOJ) new self-disclosure protocol for criminal healthcare fraud.

Frank told *Modern Healthcare* that the new policy will make the disclosure process clearer and easier for healthcare companies to navigate. He also said it could help companies stay ahead of prosecution and avoid high costs.

What the Policy Entails

The DOJ published a new protocol in a memorandum that changes how healthcare companies report criminal fraud against government programs. Key features include:

One Point of Contact

- Criminal fraud disclosures now go to the DOJ. Companies no longer have to report to the HHS Office of Inspector General (OIG) first. The OIG has updated its own policy to match

A Path to No Prosecution

- The government will not prosecute companies that voluntarily disclose, fully cooperate, fix the problem quickly, and have no "aggravating" circumstances.

Lower Penalties in Other Cases

- Companies whose disclosures do not count as voluntary may still be prosecuted, but they will face reduced penalties under the DOJ’s broader corporate reporting policy from March.

Reporting to the DOJ Matters

- Companies that report criminal fraud only to HHS-OIG, and not to the DOJ, will not receive a declination. A declination is a formal notice that prosecutors will not bring criminal charges.

Part of a Wider Crackdown

- The protocol is part of the broader anti-fraud campaign against healthcare companies that the DOJ announced on October 1.

[Read the full article](#)

- *Modern Healthcare*: “[Justice Department eases healthcare fraud self-disclosure](#)” (October 21, 2026)

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Frank A. Mazzagatti, PhD

Partner

📞 212-471-6203

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