



**Lara Compton**  
Partner

T: 310.728.1757  
F: 310.203.2727

[lcompton@nelsonhardiman.com](mailto:lcompton@nelsonhardiman.com)

### Admissions

State Bar of California

### Affiliations

American Health Lawyers Association

California Society for Healthcare Attorneys

LACBA-LACMA Committee on Biomedical  
Ethics

### Education

University of the Pacific, J.D., *with distinction*

University of the Pacific, B.A., *cum laude*

## PROFILE

In her role as outside general counsel for healthcare and life sciences clients, Lara Compton draws on her experience serving as in-house counsel for two nonprofit health systems, Sutter Health in Northern California and Community Medical Centers in Central California, and her experience at two global law firms, DLA Piper and King & Spalding. Her experiences working on a wide variety of matters instilled such deep versatility that colleagues describe Lara as the “Swiss Army Knife” when it comes to solving healthcare problems.

### “Swiss Army Knife” Versatility for Healthcare Solutions

Her versatility extends to advising clients on business planning and structuring, contract negotiations, and the broadest range of reimbursement and regulatory compliance and strategy. Lara has advised some of the largest technology companies in the world on HIPAA and other health data security and privacy matters. She has led HIPAA breach investigations and counseled on reporting requirements. She also has advised extensively on Anti-Kickback, Stark (self-referral), and other federal and state fraud and abuse issues. Lara combines familiarity with Medicare and Medicaid rules and regulations with parallel state laws, as well as licensing and operational requirements. She has overseen complex transactional matters, including mergers and acquisition and joint ventures. She regularly counsels clients in day-to-day operational risk and cost control management as well as creating, evaluating and implementing internal policies, compliance programs, and marketing and training initiatives.

### Focused on Broad Spectrum of Traditional and Emerging Healthcare Issues

Lara has represented traditional healthcare service providers (including physician organizations and IPAs, medical foundations and clinics, hospitals, behavioral healthcare, and long-term care providers), health plans, as well as health information technology and telehealth companies. Her life sciences experience includes work for medical device and pharmaceutical companies.

At Nelson Hardiman, Lara plays a leadership role in the firm’s regulatory practice, guiding clients not only on risk avoidance but also on essential challenges of growth, including the transition to value-based care arrangements and the development of new health technology and digital health-related products and services.

### Life Outside the Firm

Pro bono service is an important priority for Lara. In 2014, the American Health Lawyers recognized her as a Pro Bono Champion. Outside the office, Lara and her husband train as triathletes and are members of the LA Tri Club. Lara runs several triathlons a year and continues to compete in the 70.3-mile Half Ironman.

## EXPERIENCE

### Complex Business Planning and Negotiation

Represented California hospitals in evaluating, negotiating, and drafting physician agreements, including professional services agreements, administrative services agreements, call coverage, and hospital-based agreements.

Structured health technology business models to comply with healthcare laws and regulations.

Re-structured management services agreements to comply with California corporate practice of medicine prohibitions.

### **Disciplinary Action Defense**

Negotiated settlement of disciplinary action with the California Board of Pharmacy for a medical device wholesaler.  
Represented several telehealth and management company clients in responding to California Medical Board information requests and investigations.

### **Hospital Litigation and Operations**

Successfully defended a hospital in a million dollar dispute with the State of California over an incentive it had earned for being an early adopter of electronic health records (EHR). After a routine audit, the State alleged that our client had counted patients wrongly and should only have received \$3.27million of the \$4.21 million it had been paid. The discrepancy turned on complex definitions about what constituted a patient day. Specifically, the State alleged that psychiatric bed days were not eligible to be counted in the total bed days for EHR purposes. Nelson Hardiman, led by Rob Fuller and Lara Compton, argued that the billing and cost report reporting of the psychiatric bed days for our client were countable under the State's program. The administrative law judge agreed with our position and cut the refund request down to approximately \$192,000. Developed a toolkit to assist hospital client in managing patients who are refusing discharge or are otherwise difficult to place in an appropriate level of care. Developed business associate toolkit to assist hospital client in managing business associate relationships.

### **Marketing Campaign Compliance**

Evaluated medical device and biotechnology company marketing campaigns for compliance with the federal Anti-Kickback Statute and other fraud and abuse laws. Evaluated proposed marketing materials for stem cell products.

### **Mergers and Acquisitions**

Developed 50 state post-acquisition regulatory filing plan for large diagnostics company. Managed due diligence and pre-and post-acquisition notices for venture capital purchase of multiple ambulatory surgery centers and pain clinics. Performed regulatory due diligence for a large healthcare distribution company's purchase of a healthcare technology company. Managed regulatory due diligence in connection with the proposed sale of a telehealth provider.

### **Program Development/HIPAA/Privacy and Information Security**

Counseled providers, clinical trials companies, ancillary providers, technology start-ups, HMOs, insurance companies and others on HIPAA and state health information privacy laws and the development of privacy compliance programs. Structured joint patient assistance program to address health information privacy and security requirements.

### **Regulatory Compliance**

Provides ongoing healthcare regulatory advice to an electronic health records company. Investigated healthcare compliance implementation deficiencies for a hospital system and provided recommendations for improving compliance program.

### **Telemedicine and Healthcare Technology**

Advises telemedicine and other healthcare technology clients on business plan

development, providing expertise on telemedicine, corporate practice of medicine, the scope of practice, fee splitting, anti-kickback, and other healthcare regulatory issues. Advises human tissue product (e.g. stem cells) clients on FDA regulatory requirements and compliance.

Successfully negotiated a software development agreement with a large health care system for a software start-up client.

#### **Hospital Bankruptcy & Sale**

Lead regulatory counsel to a large health system in its Chapter 11 bankruptcy case, the largest hospital bankruptcy in U.S. history. The matter has involved corporate and regulatory support for the system's day-to-day operations as well as extensive regulatory work on the sale of the system's six hospitals, including counsel regarding California attorney general conditions and approval process.

Nelson Hardiman served as lead regulatory counsel for the \$235 million sale of two Verity Health System hospitals – O'Connor Hospital and Saint Louise Regional Hospital – to Santa Clara County.