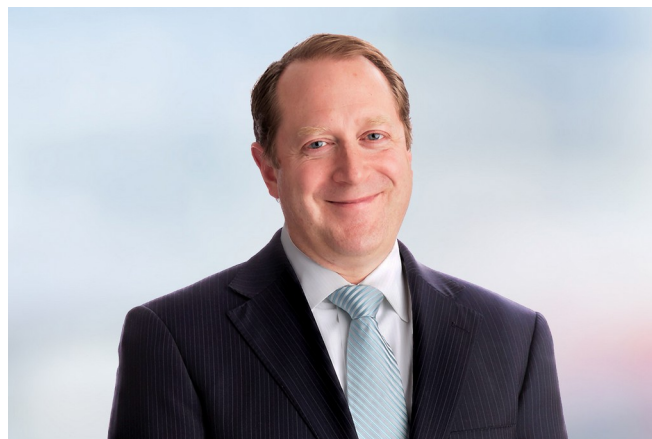


# Ross C. D'Emanuele

## Partner

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Minneapolis – 612.343.2161



Ross is committed to translating a complex healthcare regulatory environment into practical and concrete advice for his clients.

Ross works at the intersection of healthcare regulatory law and business strategy, advising medical specialty certifying board and academy client, as well as clients across the provider, payor, and drug and medical device segments of the healthcare industry. His practice covers the full compliance and transactional spectrum: healthcare fraud and abuse, the Stark Law and Anti-Kickback Statute (AKS), HIPAA and other privacy and security laws, reimbursement rules and appeals, clinical trial agreements, FDA regulation, open payments and state Sunshine Act laws, accountable care organizations (ACOs), value-based reimbursement, pharmaceutical and medical device licensing, co-development and supply arrangements, and telemedicine.

On the transactional side, Ross structures and negotiates pharmaceutical and medical device co-development, co-marketing, and supply arrangements in the U.S. and internationally. He has built corporate and contracting frameworks for complex healthcare ventures, including a national network of health system-based specialty pharmacies. He also advises on joint-venture hospital structures for physician groups and supports national pharmacy chains in major wholesaler contract renegotiations.

Ross advises a wide range of Covered Entities and Business Associates on HIPAA compliance programs and defends them in Office for Civil Rights (OCR) investigations arising from data breaches. His privacy work extends beyond HIPAA to emerging state-level health privacy laws and Federal Trade Commission (FTC) enforcement — areas where the regulatory landscape is shifting rapidly and the stakes for healthcare organizations are high.

Ross also designs and updates corporate compliance programs for healthcare providers and medical device manufacturers, helping organizations build the internal infrastructure

## Education

- University of Virginia School of Law (J.D., 1996)
  - *Journal of Law and Politics*
- Syracuse University (B.A., Political Science, 1989)
  - *magna cum laude*
  - Phi Beta Kappa

## Bar Admissions

- Minnesota

to identify, address, and prevent regulatory risk before regulators come knocking.

## Select Experience

- Represented hospital system in defending Department of Justice allegations of billing fraud, resulting in no claims or action taken.
- Creates national networks of physician practices and management relationships for telemedicine networks.
- Successfully appealed various Medicare contractor overpayment determinations.
- Represents wide range of Covered Entities and Business Associates in OCR investigations arising from data breaches.

## Court Admissions

- U.S. Supreme Court
- U.S. District Court for the District of Minnesota

## Professional Affiliations

- Member, American Health Law Association (AHLA)
- Board Member, Twin Cities Diversity in Practice, 2018 - 2026
- Member, Board of Directors, Courage Kenny Foundation, 2015 – 2018

## Accolades

- *Chambers USA*, Healthcare, Minnesota, 2025-2026
- *Best Lawyers in America*®, Health Care Law, 2017-2027
- *Best Lawyers*® *Lawyer of the Year*, Healthcare Law, 2020
- *Minnesota Super Lawyers*®, "Rising Star," 2002, 2004, 2006

## Select Presentations

- *Sweeping Changes to the Stark and Anti-Kickback Regulations: Final Rules for Hospitals* (January 2021)

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# Dorsey Health Law

March 19, 2026

## **Discounting the Risk of Discounts?**

June 25, 2025

## **Oregon Expands Prohibition on the Corporate Practice of Medicine, Severely Restricting Management Services Organizations**

April 29, 2024

## **Significant New Healthcare Privacy and Cybersecurity Developments**

October 27, 2023

**Minnesota Supreme Court Holds That The Minnesota Health Records Act Allows Release of Health Records For Permitted Purposes Under HIPAA**

May 24, 2023

**Broad New Washington Privacy Law Requires Immediate Compliance Action**

March 15, 2023

**Tracking Online User Activity: HIPAA and Other Legal Risks**

February 15, 2023

**FTC Takes First Enforcement Action for Violation of the Health Breach Notification Rule – A Federal Health Privacy Rule Beyond HIPAA**

October 19, 2022

**Recent DOJ Settlements Involving DME Manufacturers Highlight Important Anti-Kickback Considerations**

April 15, 2022

**How EKRA and AKS Impact Laboratories and Commission-Based Compensation**

August 2, 2021

**HHS Gives Guidance to Providers on the No Surprises Act in Interim Final Rule**

January 5, 2021

**White Papers: Understanding the Final Rules to Revise the Stark Law, Anti-Kickback Statute and Beneficiary Inducement Civil Monetary Penalty Regulations**

November 25, 2020

**OIG Skeptical of Medical Device and Pharmaceutical Speaker Programs**

September 11, 2020

**CMS Issues Interim Final Rule to Enforce COVID-19 Reporting Requirements**

May 7, 2020

**False Claims Act Exposure for Beneficiaries of the Public Health and Social Services Emergency Relief Fund: Mitigating Risks of Ambiguous Terms & Conditions**

May 5, 2020

**CMS Expands Emergency Declaration Blanket Waivers for Health Care Providers**

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## Insights

May 24, 2023

**Broad New Washington Privacy Law Requires Immediate Compliance Action**

February 16, 2023

**FTC Takes First Enforcement Action for Violation of the Health Breach Notification Rule – A Federal Health Privacy Rule Beyond HIPAA**

May 27, 2021

**Meet our Board Co-Chair, Ross D'Emanuele!**

January 5, 2021

**White Paper: Understanding the Final Rules to Revise the Anti-Kickback Statute and Beneficiary Inducement Civil Monetary Penalty Regulations**

January 5, 2021

**White Paper: Understanding the Final Rules to Revise the Stark Law Regulations**

January 5, 2021

**White Papers: Understanding the Final Rules to Revise the Stark Law, Anti-Kickback Statute and Beneficiary Inducement Civil Monetary Penalty Regulations**

May 6, 2020

**False Claims Act Exposure for Beneficiaries of the Public Health and Social Services Emergency Relief Fund: Mitigating Risks of Ambiguous Terms & Conditions**

March 27, 2020

**CARES Act Summary of Provisions that Support America's Health Care System**

January 1, 2020

**Dorsey Partner Ross D'Emanuele Discusses Healthcare Price Transparency**

November 19, 2019

**Sweeping Proposals Issued By CMS To Revise Stark Law Regulations**

November 18, 2019

**Dorsey Partner Ross D'Emanuele Discusses Healthcare Price Transparency Rules**

November 1, 2019

**Sweeping Proposals Issued By OIG To Make Changes To The Anti-Kickback Statute Safe Harbors And Add An Exception To The Civil Monetary Penalty Law Governing Beneficiary Inducements**

July 21, 2017

**Dorsey Partner Ross D'Emanuele Discusses Healthcare Cybersecurity**

