

Press Coverage | May 19, 2025

DOJ Sweetens Self-Disclosure Pot; Health Fraud Ranks High in White-Collar Enforcement Plan

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Cal Stein, a partner with Troutman Pepper Locke, was quoted in the May 19, 2025 *Report on Medicare Compliance* article, [“DOJ Sweetens Self-Disclosure Pot; Health Fraud Ranks High in White-Collar Enforcement Plan.”](#)

The promise of a declination to prosecute is significant, said attorney Callan Stein, with Troutman Pepper Locke. The previous “presumption” language was “squishier.” Otherwise, the changes are variations on a theme. “Clients are hesitant to make self-disclosures without something close to a guaranteed benefit and forever there was no guaranteed benefit. No promised quid pro quo. It was different versions of ‘if you do a full and timely self-disclosure, we will take it into account. Trust us.’ That wasn’t enough.” With the exception of a declination promise, Stein thinks the revised CEP hews to the “trust us” paradigm.

But the CEP, which is in the Justice Manual, ups the ante for compliance programs, Stein said. “What becomes more important is internal reporting and investigating functions to reap the benefits of this new policy.”

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