Holland & Hart



PRACTICES

Corporate

INDUSTRIES

Healthcare

EDUCATION

Creighton University School of Law, J.D.
cum laude
Dean's Academic Scholarship

Colorado State University, B.A.

BAR ADMISSIONS

Colorado
Nebraska
Utah

Jake Walker

Associate

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Jake guides healthcare providers and facilities through compliance, transactions, and government enforcement—from risk assessment and policy development to investigations and remediation.

Jake advises healthcare providers and facilities on the regulatory, transactional, and enforcement issues that shape their operations. On the compliance side, he counsels clients on fraud, waste, and abuse questions under the Anti-Kickback Statute and Physician Self-Referral (Stark) Law, as well as health information privacy rules such as HIPAA, 42 CFR Part 2, the Information Blocking rules, the FTC Health Breach Notification Rule, and their state analogues. He also guides providers through licensing, credentialing, and other state and federal regulatory requirements.

His transactional practice supports mergers, acquisitions, practice sales, and other healthcare deals, from regulatory due diligence and deal structuring through contract negotiation. He also handles the corporate side of these transactions, including entity formation, governance, and related employment matters.

Jake also defends healthcare organizations in government enforcement actions, including False Claims Act investigations. He responds to Civil Investigative Demands, coordinates document production strategy, and negotiates with government representatives. In addition, he conducts internal investigations and advises on voluntary self-disclosures, report-and-repayment compliance, and audits under federal and state healthcare programs.

EXPERIENCE

Compliance & Privacy

- Anti-Kickback Statute and Physician Self-Referral law (Stark)
- Civil Monetary Penalties Law
- Fraud, waste, and abuse rules
- Licensing and credentialing
- No Surprises Act
- HIPAA
- 42 CFR Part 2
- Information Blocking rules
- FTC Health Breach Notification Rule

- State analogues of the same

Healthcare Transactions

- Healthcare M&A and due diligence
- Healthcare transaction notification laws
- Professional entity governance
- Service and provider agreements
- Employment agreements

Enforcement & Investigations

- False Claims Act defense
- DOJ and state AG Civil Investigative Demands
- Internal investigations and self-disclosure
- Report and repay analysis

CLIENT RESULTS

Healthcare

Navigated numerous healthcare organizations and providers through implementation of the No Surprises Act including development of policies and procedures addressing balance billing and handling self-pay and uninsured patients.

Counseled healthcare organization through reporting Provider Relief Fund Payments late and obtained favorable response resulting in organization being allowed to report such payments after the deadline.

Assisted numerous organizations with regulatory notifications triggered by M&A transactions.

Assisted healthcare organizations with implementation of programs and compliance structures to comply with specific Anti-Kickback Statute safe harbors and Stark Law exceptions including, but not limited to, development of a patient assistance fund, allowing for provision of local transportation to patients, and value-based care programs.

Assisted accountable care organization in development of agreements for compliance with third-party payor arrangement and Medicare Shared Savings Program rules.

Delivered training presentations to organizations, and their respective officers, on HIPAA obligations.

PUBLICATIONS

"Revamp of The No Surprises Act Federal Independent Dispute Resolution Process," *Health Law Update*, June 26, 2026

"Beyond HIPAA: Navigating the "More Stringent" Standard," *Health Law*

Update, February 3, 2026

"Information Blocking is in its Teething Stage," *Physicians Bulletin, Metro Omaha Medical Society* , September/October 2024

"AHLA Health Care Fraud Law – A 50-State Survey, First Edition," *AHLA Health Care Fraud Law: A 50 State Survey, First Edition, Chapter Author*, October 2022

BLOG POSTS

"Remote Monitoring Changes Under the CY 2027 Medicare Physician Fee Schedule Final Rule," *The Pulse*, November 11, 2026

"New Colorado Dental Practice Ownership Rules Starting January 1, 2027: What Dentists and DSOs Need to Know," *The Pulse*, October 30, 2026

"Proposed CMS CY 2027 Physician Fee Schedule Rule Tightens RPM Requirements," *The Pulse*, July 20, 2026

SPEAKING ENGAGEMENTS

"The No Surprises Act: A Compliance Refresher," *2026 Health Law Compliance Series*, September 17, 2026

PROFESSIONAL AND CIVIC AFFILIATIONS

- American Health Lawyers Association, Member
- International Association of Privacy Professionals, Member
- Nebraska State Bar Association Health Law Section, Former Executive Committee Member, 2022-2025