

William P. Dillon

Shareholder

Tallahassee
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Practice & Industry Areas

- Government Affairs Law & Lobbying
- Health Care
- Technology Law
- Cyber Security and Data Protection
- Healthcare Transactions

Education

- St. Thomas University School of Law, J.D., *with honors*, 1998
- Florida International University, B.S., *cum laude*, 1994

Bar & Court Admissions

- Florida, 1998
 - Board Certified in Health Law, 2005
- U.S. District Court, Middle District of Florida, 1998
- U.S. District Court, Northern District of Florida, 2010

Overview

Bill Dillon formerly served as the firm's Tallahassee Office Managing Shareholder and is Board Certified by the Florida Bar as a specialist in the area of Health Care law. He is also certified by the Health Care Compliance Association in the area of corporate compliance (CHC) and the International Association of Privacy Professionals as an Information Privacy Professional for the U.S. Section (CIPP/US). Bill focuses his practice on assisting health care providers and entities to adhere to the complex regulatory requirements of the health care sector. Additionally, he also advises on data privacy and security issues in both the health care and non-health care sectors.

For nearly two decades, Bill has represented Federally Qualified Health Centers (not for profit and public entity federal grantees) in providing services to Florida's medically underserved populations. This representation has included assisting these entities in complying with federal and state grant requirements and other programs such as the 340B

Drug Discount Program. In addition to his representation of Federally Qualified Health Centers, Bill has represented health care providers and entities in structuring compliant business relationships, as well as in providing counsel regarding business operations.

In the area of data privacy and security, Bill has been involved in the areas of HIPAA and HITECH. He previously served as an outside consultant to Florida's Agency of Health Care Administration's Privacy and Security Project, which was part of the larger Health Information Security and Privacy Collaboration, funded by the federal Agency for Healthcare Research and Quality. During his work on the project, Bill assisted industry stakeholders in analyzing Florida laws relating to the exchange of health care information. In an effort to assist in the elimination of barriers to health information exchange, Bill assisted in the drafting of the Florida Electronic Health Records Exchange Act, which was passed into law in 2009.

Although Bill represents health care providers and entities in administrative and regulatory matters, his primary focus is on helping providers and entities to steer clear of activities that could be considered non-compliant. He continuously strives to help clients achieve compliant operations so that they can dedicate their time and resources to providing health care.

Representative Matters

- Assisted HIPAA covered entities and business associates in responding to data breach events
- Reviewed Clinical Trial Agreements for clinical research organizations
- Provided assistance to clients in matters relating to the 340B Discount Drug Program
- Assisted health care providers in responding to preliminary and final audit matters from the Agency for Health Care Administration
- Represented providers in Medicaid Program Integrity and Medical Fraud Control Unit matters
- Represented health care providers in EHR Meaningful Use audits and appeals
- Served as Health Law Consultant to the Florida Agency for Health Care Administration's Privacy and Security Project-HISPIC – 2006 to 2009
- Represented one of Florida's first successful health information exchanges
- Represented health information Technology Company specializing in the implementation of health information exchange organizations
- Represented facilities and individual health care providers in transactional issues related to health information technology
- Represents Federally Qualified Health Centers in various operational and management issues
- Represented Federally Qualified Health Centers in affiliation agreements, community benefit grants and GME programs with hospitals and health systems

- Represents physicians and physician practices in issues relating to employment contracting, income guarantee agreements, practice purchases, fraud and abuse compliance and other issues related to operating a medical practice
- Represents health care providers in health information technology issues, including the licensing of electronic medical records software and participation in regional health information organizations
- Provided representation to health care providers in administrative matters before the Departmental Appeals Board of the U.S. Department of Health and Human Services
- Provided representation to health care providers and other employers on the design and implementation of employee handbooks and employment policies
- Provided representation to employers in matters involving the Equal Employment Opportunity Commission and Florida Commission on Human Relations
- Provided representation to Federally Qualified Health Centers in matters involving intergovernmental transfers of local, state, and Federal matching funds
- Assisted health care providers in responding to investigations by the Office of Civil Rights for the U.S. Department of Health and Human Services relating to alleged HIPAA violations
- Assisted health care providers in responding Meaningful Use EHR Incentive Payments audits and appeals
- Provide assistance to health care providers in complying with employment and labor issues including FMLA, FLSA and employment terminations
- Provide assistance to not for profit organizations for corporate governance issues and executive compensation issues
- Represents health care providers contracting with managed care entities

Honors

- *The Best Lawyers in America*®, Administrative/Regulatory Law, 2023-24
- *Chambers and Partners*, “Leaders in their Field,” Health Care, 2021-23
- Distinguished BV rating as independently determined by Martindale-Hubbell
- *Florida Super Lawyers*®, 2010-17, 2019-23
- *Florida Trend*, “Legal Elite®,” 2011-15, 2019-22
- The Florida Bar, Health Law Section, Lifetime Achievement Award, 2021

Publications & Presentations

- “An Introduction to Privacy Regulation, Litigation, and Enforcement,” presenter, FSU College of Law Webinar, October 2023
- “Development and Enforcement of Weapons Policies for Community Health Centers,” speaker, Health Center Emergency Management Summit, May 2023

- “FTC’s enforcement action against GoodRx ‘a wakeup call’ for digital health,” *Digital Health Business & Technology*, quoted, February 2023
- Florida Privacy Laws,” Florida Bar Health Law Section Master Class 2022, speaker, October 2022
- “Physician Related Fraud Risk-Navigating Recent Enforcement Developments,” Clinical Practice Compliance Conference, speaker, October 2022
- “No Surprises Act and Good Faith Estimate,” FQHC Associates Webinar, panelist, March 2021
- “Seacoast Bank’s 6th Annual Cyber Symposium,” speaker, September 2021
- “HIPAA & Information Blocking – Impact on Patient Information Access Rights,” National Chiropractic Meeting, presenter, August 2021
- “Florida Law and Rules- HIPAA- Ownership and Control of Health Records,” National Chiropractic Convention, August 2019
- “Medical Records,” Florida Bar Health Law Section Board Certification Seminar, March 2018
- “Privacy and Security Concerns,” Florida Bar Health Law Section Masters Class on Telemedicine, March 2018
- “Without Security There Is No Privacy,” Florida Bar Health Law Section Compliance CLE, February 2018
- “Medical Records,” Florida Bar Health Law Section Board Certification Seminar, March 2017
- “Effective Corporate Compliance for Health Centers,” Florida Association of Community Health Centers Annual Meeting, August 2017
- “FTCA Compliance for Health Centers,” Florida Association of Community Health Centers Annual Meeting, July 2016
- “Medical Records,” Florida Bar Health Law Section Board Certification Seminar, March 2016
- “Corporate Compliance for FQHCs,” Health Choice Network, July 2015
- “Compliance 101 for Community Health Centers,” Health Care Compliance Association – Puerto Rico Regional Meeting, May 2014
- “EHR Pitfalls for Providers,” Health Care Compliance Association – South Atlantic Regional Meeting, February 2014
- “EHR Pitfalls for Providers,” Capital Medical Society, March 2014
- “Corporate Compliance for Federally Qualified Health Centers,” Health Care Compliance Association – Puerto Rico Regional Conference, May 2014
- “Responding to a Breach Under HIPAA and Florida Law,” Hospital Association Meeting, September 2013
- “RHIO and HIE Participation Agreements,” American Bar Association Health Law Section Emerging Issues Conference, February 2010
- “Use and Disclosure of Health Information in Florida,” Florida Bar Health Law Section Board Certification Review Seminar, March 2010

- “HIPAA/HITECH Resource Guide,” *American Health Lawyers Association*, contributing co-author, 2014
- “Federal Qualified Health Centers,” chapter 9, *Florida Practitioner’s Health Law Handbook*
- “The Quest for Interoperable Electronic Health Records – A Guide to Legal Issues Establishing Health Information Networks,” contributing co-author, *American Health Lawyers Association*
- “Physicians and RHIOs – Understanding the Use, Disclosure and Maintenance of Patient Information,” *Physician Organizations Newsletter*
- Numerous lectures in Florida and nationally on issues relating to HIPAA, corporate compliance and health information technology

Professional Associations & Memberships

- Florida Bar
 - Health Law Section
 - Former Chair, 2015
 - Executive Council, 2009-16
 - Health Law Certification Committee
 - Chair, 2022-Present
- American Health Lawyers Association
- Health Care Compliance Association – Certified in Health Care Compliance (CHC)
- International Association of Privacy Professionals – Certified in Information Privacy (CIPP/US)
- Agency for Health Care Administration
 - Health Information Exchange Legal Work Group, member, 2023-Present

Civic & Community Service

- Tallahassee Sports Council, appointed by Leon County Board of Commissioners, 2018
- Gulfwinds Triathletes
 - Past President
 - Board Member