DOJ’s National Fraud Enforcement Division Announces Five Priority Areas — What Companies Need to Know

Sean M. Farrell, Thomas F. Rybarczyk

August 24, 2026

Earlier this month, Assistant Attorney General Colin M. McDonald issued a memorandum outlining the enforcement priorities of the Justice Department’s newly created National Fraud Enforcement Division. Included in the memorandum was also DOJ’s plan to consolidate fraud-enforcement capabilities under a centralized, national structure with approximately 500 attorneys and staff with plans to “rapidly grow.” These identified priorities and structural shift provide companies important insights on where DOJ intends to concentrate its expanding fraud-enforcement resources and reinforces that federal white-collar enforcement remains active. Companies in affected sectors should evaluate their compliance programs, particularly those involved in government contracting, health care, and global trade where this administration has already signaled enhanced enforcement. Such self-evaluation may help those companies that identify potential issues to adequately consider the Justice Department’s self-disclosure benefits, which the memorandum reinforced by highlighting that it will “reward[] those that voluntarily self-disclose, cooperate, and remediate.”

Five Principal Enforcement Priorities

The memorandum identifies five principal areas of enforcement:

- **Public Trust and Financial Integrity:** Consistent with the Fraud Division’s “core mission”, the Fraud Division’s top priority is investigating various forms of fraud affecting the public fisc, including bid rigging, bribery, defective pricing, billing fraud, and fraud involving federal benefit and grant programs.

- **Health care fraud:** As this administration has made clear, prosecuting health care fraud remains a priority, including fraud involving Medicare and Medicaid funds, telemedicine, home health and hospice services, controlled substances and the deceptive marketing of health care products and services.

- **Criminal Tax Fraud:** Upon its creation, the Fraud Division took over the Criminal Division Tax’s Section. Priorities now include prosecuting fraudulent tax return preparers and those who sell unsuspecting clients on illegal tax schemes.

- **Global Trade and Commerce:** The Fraud Division will prioritize customs and trade-related fraud using the pre-existing Trade Fraud Task Force, prioritizing transshipment schemes, country-of-origin fraud, undervaluation of imports, sanctions evasion and forced-labor schemes.

- **Corporate Misconduct:** Through the Corporate Enforcement Section, the Fraud Division will continue prosecute corporations that commit fraud, though the memo reinforced once more that the Justice Department will reward companies who self-disclose, remediate, and cooperate.

Recent DOJ actions confirm the Fraud Division’s announcement earlier this month is more than just talk.

Procurement and Benefits Fraud

The memorandum describes government procurement fraud as a “critical priority” and directs prosecutors to protect the integrity of federal benefit and grant programs. This direction is consistent with DOJ’s May announcement that its Civil Division would accelerate the review of False Claims Act *qui tam* complaints involving federally funded, state-administered benefits programs.

Under the accelerated process, DOJ intends to conduct an initial review of qualifying complaints within 60 to 120 days. At the end of that review, the government may allow the relator to proceed, undertake further investigation, or seek dismissal of legally deficient or insufficiently specific claims. Potential criminal violations may also be referred to the Fraud Division or other DOJ components, while relevant agencies may consider administrative actions such as suspending payments.

The Department's focus on procurement and benefits fraud is further illustrated by its recent launch of the National Fraud Detection Center (NFDC), a prosecutor-led, multi-agency initiative designed to identify and investigate fraud affecting taxpayer-funded programs. By bringing together federal law enforcement agencies, Offices of Inspector General, and advanced analytical capabilities, the NFDC aims to improve the government's ability to detect fraud schemes operating across multiple agencies and programs. The initiative reflects DOJ's growing emphasis on proactive fraud detection and enhanced coordination among enforcement authorities, particularly in cases involving federal funds, grants, contracts, and benefits programs.

This compressed review period and the creation of the NFDC signal that companies receiving government funds or participating in federally supported programs may face faster and more coordinated scrutiny across civil, criminal, and administrative channels.

Expanding Health Care Fraud Enforcement

Health care fraud is another clear point of emphasis. In April, DOJ established a West Coast Health Care Fraud Strike Force covering Arizona, Nevada, and the Northern District of California. The initiative combines the Fraud Division’s Health Care Fraud Section with U.S. Attorneys’ Offices and other federal enforcement partners and is intended to address increasingly sophisticated, technology-enabled health care fraud schemes.

This expansion on the West Coast is but one example of the DOJ’s increased use of these health care fraud strike forces. Over the past year, DOJ has announced task forces in Boston (District of Massachusetts), Minneapolis (District of Minnesota), and, this past month, Philadelphia (Eastern District of Pennsylvania).

DOJ’s prioritization of health care fraud can also be seen in the 2026 National Health Care Fraud Takedown where the department announced charges against 455 defendants, including 90 doctors and other licensed medical professionals, in cases involving more than $6.5 billion in alleged fraud. The enforcement action spanned 56 federal districts and 45 states and territories and included the use of data analytics, international cooperation, asset seizures and parallel administrative actions.

Together, these developments indicate that DOJ intends to combine national coordination, regional strike forces, data analysis and criminal, civil, and administrative remedies to pursue health care fraud involving both individuals and corporate actors.

Global Trade and Commerce Enforcement

Global trade and commerce have been another priority for the DOJ over the past year, as demonstrated by its partnership with the Department of Homeland Security in the Trade Fraud Task Force. In its first year, the Trade Fraud Task Force surpassed a billion dollars in civil and criminal recoveries, penalties, forfeitures and publicly charged losses.

Further demonstrating DOJ's prioritization of global trade and commerce enforcement is the Trade Fraud Task Force's publication of its 27-page guidance outlining its enforcement approach and priorities for, among other constituencies, the business community. Then, on the same day DOJ announced its priorities for the Fraud Division, the White House Office of Trade and Manufacturing Policy issued a report titled "The Great Transshipment Scam," identifying more than 40 countries that have an elevated risk of illegal transshipment, that is, illegal shipment of goods through a third country to avoid tariffs and other trade remedies. As noted above, one of the schemes the Fraud Division has singled out as a priority is transshipment schemes.

These actions demonstrate that enhanced global trade and commerce enforcement is here to stay.

Corporate Self-Disclosure Remains an Important Consideration

The memorandum's treatment of corporate misconduct is also significant. Although the Fraud Division states that it will prioritize corporate fraud, it distinguishes between companies that disregard the law and those that voluntarily self-disclose, cooperate and remediate misconduct.

DOJ's Department-wide Corporate Enforcement and Voluntary Self-Disclosure Policy provides a uniform framework for corporate criminal matters other than criminal antitrust violations. Under the policy, a company may receive a declination when it voluntarily self-discloses misconduct, fully cooperates, timely and appropriately remediates and no aggravating circumstances are present. Even when a company is not eligible for a declination, cooperation and remediation may result in a non-prosecution agreement, no independent compliance monitor and a substantial reduction from the applicable fine range.

DOJ's recent declination involving Campus Eye Management Holdings LLC, the first of its kind in the health care space, illustrates how the Department intends to apply this policy in practice. Although the underlying investigation involved alleged health care fraud, kickbacks and bribery, DOJ declined prosecution after concluding that the company had timely self-disclosed the misconduct, fully cooperated with the government's investigation and undertaken significant remediation efforts. The resolution also reflects DOJ's stated focus on individual accountability, as the Department simultaneously announced charges against the former executive allegedly responsible for the misconduct. The Campus Eye Management matter serves as a practical reminder that self-disclosure, cooperation and remediation can materially affect a company's resolution even in cases involving serious misconduct.

As discussed in our recent article, "Once You've Decided to Self-Disclose, Here's How to Do It Right," however, deciding to self-disclose is only the first step. Companies must be prepared to disclose promptly, present the relevant facts candidly, preserve and produce supporting information, identify responsible individuals and undertake meaningful remediation. Self-disclosure also does not necessarily eliminate exposure to civil regulators, state authorities, or private litigants. (For additional analysis, view our webinar, Inside the DOJ Playbook: New Guidance on Whistleblowers, Leniency, and Self-Disclosure.)

What Companies Should Do Now

In light of the Fraud Division's announced priorities and enhanced enforcement posture, companies involved in government contracting, health care, and international trade should consider whether their existing compliance and investigation procedures reflect the Division's stated priorities. In particular, companies should:

- Reassess fraud risks associated with government contracts, federal funding, benefit programs, health care billing, customs and trade practices and tax reporting.
- Evaluate whether internal reporting and escalation procedures allow potential misconduct to reach legal and compliance personnel quickly.
- Confirm that investigation protocols can support prompt fact development, document preservation and informed self-disclosure decisions.
- Leverage the company's own data analytics capabilities to proactively detect potential compliance issues or irregularities before they attract government attention.

The new memorandum does more than identify abstract enforcement interests. When viewed alongside DOJ's recent actions involving benefits, health care, and trade fraud, it provides a practical roadmap of where the Department intends to deploy its growing fraud-enforcement resources. Companies operating in these areas should review their compliance and response procedures before an enforcement issue arises.