



Noreen Vergara

PARTNER

THE LINK VIRTUAL

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OVERVIEW

With a background in healthcare operations and executive leadership, Noreen provides strategic advice for healthcare clients.

Noreen's focus is supporting healthcare providers and health plans as they ensure appropriate reimbursement. She frequently works with providers who are finding new ways to operate: many of the clients Noreen supports are in the process of forming new healthcare networks with the aim of filling gaps in existing care. She assists with compliance and governance structures, as well as with reimbursement strategies with third-party payors, and she also represents clients in resolving situations where reimbursement has previously been limited to private pay patients but who are now able to access reimbursement from a patient's health plan benefit.

While Noreen regularly serves clients across the healthcare spectrum, she has a special focus on mental health, substance use disorder treatment ("Behavioral Health"), and psychedelics-assisted treatment providers. With FDA approval anticipated for various psychedelic therapeutics, Noreen helps these future providers structure their organizations and determine the most effective path to reimbursement.

Noreen also counsels healthcare organizations and benefit plans on the new benefit administration laws of recent years, including the Mental Health Parity and Addiction Equity Act, the No Surprises Act, transparency in coverage and hospital pricing transparency regulations, Medicare Advantage compliance, and those governing risk-sharing and health insurance payment arrangements. These intensely detailed regulations establish significant data and reporting requirements and often alter organizations' existing

Industry

Healthcare

Services

Healthcare Labor & Employment and Immigration

Healthcare Operations

Healthcare Regulatory & Compliance Counseling

Medical Staff & Governance

No Surprises Act

Psychedelics & Emerging Therapies

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contracts, recordkeeping procedures and various other policies. Noreen knows clients want to comply, but the required changes are often so immense that they aren't sure how to do so.

Prior to joining Husch Blackwell, Noreen served as Interim CEO, General Counsel and Chief Human Resources Executive for a national managed behavioral health joint venture. In this position, she leveraged her experience in strategic planning and corporate governance to guide the company to 500 percent growth over six years, manage a network of thousands of providers, and help secure the largest contract in company history.

Noreen's background means that she intuitively understands the operational needs and concerns of healthcare leaders, and she's well-versed in the strategic thinking these organizations require. She also has firsthand knowledge of how claims are processed and a deep understanding of the Affordable Care Act and the insurance industry. Noreen speaks clients' language, and she has a particularly nuanced understanding of the behavioral health world. As a behavioral health managed care executive, she helped advocate for mental health parity and integrated care, and thus understands these requirements inside out. It's second nature to her to help clients with their distinct compliance needs, as well as audits and reimbursement challenges.

Appreciated both for her decisiveness and humor, Noreen is a relationship builder who can share with clients her own leadership experiences in developing large multi-state organizations while reducing legal exposure. Her aim is to help clients solve their legal and organizational challenges and ensure they receive the appropriate type of payment for their services so that they can focus on healthcare.

Experience

INSURANCE AND MANAGED CARE

- Advises insurers and health maintenance organizations ("HMOs") on entering into new managed care markets including Medicare Advantage, Medicaid, health insurance exchange plans and commercial products.
- Advises managed care organizations and provider risk-bearing organizations on matters involving utilization review, claims processing and vendor management.
- Led due diligence in a \$80M managed care acquisition and oversaw subsequent integration activities including the re-contracting of over 8000 health providers across the country.
- Advised various state departments of insurance on Affordable Care Act health insurance exchange development

Experience

HEALTHCARE REIMBURSEMENT

- Represents various managed care entities and providers who engage in value-based contracting, capitation and other risk-based payment options in complying with federal and state regulations.
- Developed and implemented clinical joint ventures among insurers and other payors, hospital systems, freestanding emergency centers, community mental health centers, physician practices, substance use disorder treatment facilities and peer support organizations.
- Develop and implement reimbursement arrangements for providers involved in accountable care organizations ("ACOs"), shared-savings payment structures, care coordination programs and social determinants of health programs.
- Advise behavioral health treatment providers, medication assisted treatment ("MAT") programs, psychedelics assisted therapy providers and peer support organizations on regulatory and compliance issues including telehealth requirements, corporate practice, fee splitting and referrals, and privacy and security.

PROVIDER AND PAYOR ALIGNMENT AND INTEGRATION

- Advises provider networks and management services organizations on developing contracting plans involving thousands of practitioners of varying licensures.
- Successfully resolved a multi-contract claims payment dispute between a large multispecialty provider group and a national payor system resulting in a \$4 million underpayment recovery for the client.
- Advises behavioral health providers and facilities on the development of new facilities and programs financed through multiple channels including private equity investment, federal and state grants, and Medicaid expansion funding.

Experience

PRIVACY AND DATA SECURITY

- Advises clients on responding to health information privacy security incidents involving millions of patients' electronic medical records across multiple states. Advises clients on appropriate responses and best practices to protect patient data.
- Advises clients on developing compliant solutions to secure and appropriately share behavioral health treatment information.
- Served as HIPAA Privacy Officer at national managed behavioral health venture for millions of health plan members requiring ongoing development and delivery of compliance training, including federal and state requirements for mental health and substance use medical records.

COMPLIANCE COUNSELING

- Advises behavioral health providers and facilities, telehealth organizations, and physician practices on general corporate, employment and regulatory matters.
- Advises insurers and other payors on compliance with commercial, Medicare Advantage and Medicaid managed care regulations.
- Counsels clients through reimbursement and overpayment audits and assists clients with claims reimbursement issues.
- Created and operated multistate managed care organization's mental health parity compliance program.
- Advised on issues including Affordable Care Act (ACA) implementation, Medicare Supplement requirements, coordination of benefit requirements, third-party administrator guidelines, medical-loss ratio requirements, limited medical benefit plans and health insurance exchange development.

Education

- J.D., Saint Louis University School of Law
 - Certificate of Health Law
 - *Saint Louis University Journal of Health Law*, Lead Articles Editor and Staff Editor
- B.A., Rockhurst University
 - Psychology
 - *cum laude*
 - Psi Chi Rockhurst Chapter, President

Admissions

- Missouri
- Kansas
- Florida

*Contact Noreen to set up an in-person consultation by appointment in the Kansas City office.



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