HUSCH BLACKWELL

Noreen Vergara

PARTNER

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OVERVIEW

Noreen advises healthcare providers, health insurers, health plans, behavioral health organizations, clinically integrated networks, and healthcare technology companies on the regulatory, operational, and reimbursement challenges that arise as healthcare delivery and financing models evolve.

She advises clients on complex issues involving reimbursement, insurance regulation, compliance, governance, data sharing, privacy, and emerging technologies.

Noreen's practice focuses on helping clients navigate changing healthcare delivery systems and payment structures. She routinely counsels hospitals, health systems, behavioral health providers, community mental health centers, physician organizations, ancillary providers, health plans, third party administrators, and provider networks on regulatory strategy, reimbursement, contracting, and operational compliance. She has significant experience developing governance and compliance frameworks that support innovative healthcare arrangements, including value-based care initiatives, provider collaborations, and alternative payment models.

Drawing on her background in healthcare operations and managed behavioral health, Noreen is particularly focused on helping organizations respond to emerging regulatory challenges involving artificial intelligence, healthcare data, and integrated care models. She advises clients on the adoption and governance of AI enabled

Industry

Healthcare

Services

Data Privacy & Cybersecurity
Healthcare Operations
Healthcare Regulatory & Compliance Counseling
Medical Staff & Governance
No Surprises Act
Psychedelics & Emerging Therapies

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technologies, data sharing arrangements, patient consent frameworks, healthcare privacy requirements, and evolving federal and state regulatory requirements.

Health Plans and Managed Care

Noreen regularly advises health plans, insurers, third party administrators, provider sponsored health plans, association health plans, healthcare sharing ministries, and other risk bearing healthcare organizations on regulatory compliance, product design, reimbursement structures, network development, contracting, and the interaction between state insurance laws, federal healthcare programs, and healthcare delivery systems. She works with clients developing innovative health coverage arrangements and alternative payment models that seek to improve access, affordability, and quality of care.

Behavioral Health

Behavioral health organizations regularly rely on Noreen to address the unique legal and operational issues that arise in mental health and substance use disorder treatment settings. She advises community mental health centers, certified community behavioral health clinics, residential treatment providers, and other behavioral health organizations on HIPAA, 42 CFR Part 2, patient consent, information sharing, telehealth, reimbursement, and healthcare operations. She also helps organizations modernize intake, privacy, compliance, and governance processes as they move toward more integrated models of care.

AI and Health Technology

Noreen counsels healthcare organizations on the legal and regulatory implications of artificial intelligence and emerging healthcare technologies. Her work includes advising on AI governance, transparency obligations, patient disclosure and consent requirements, healthcare data use, privacy considerations, vendor contracting, and implementation strategies. She frequently speaks and writes on the rapidly evolving legal landscape governing AI in healthcare and behavioral health settings.

Provider Reimbursement and Payor Strategy

Noreen helps providers develop and execute strategies for securing appropriate reimbursement from commercial insurers, government programs, and other third-party payors. In addition to reimbursement counseling and contracting, she assists providers in resolving complex reimbursement disputes involving network adequacy, single case agreements, claims processing, underpayments, and other payor related disputes. She works closely with clients to evaluate regulatory, contractual, and operational options for recovering reimbursement and strengthening future payment arrangements.

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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
- Represented Mississippi Farm Bureau Federation in establishing state nonprofit agricultural membership organization (NAMO).
- Develop and implant Form A filing strategies for health systems with insurer subsidiaries.
- Advises insurers and other payors on compliance with commercial, Medicare Advantage and Medicaid managed care regulations.
- 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.

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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.

BEHAVIORAL HEALTH

- Advises behavioral health providers on implementation and governance of artificial intelligence technologies, including privacy, transparency, consent, and regulatory compliance considerations.
- Counsels community mental health centers and substance use disorder treatment providers on HIPAA and 42 CFR Part 2 compliance, patient information sharing, intake processes, telehealth, and workforce training.
- 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.
- 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.

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Experience

AI AND HEALTH TECHNOLOGY

- Structures healthcare technology and data sharing arrangements involving protected health information, business associate relationships, information security obligations, and healthcare innovation initiatives.

PROVIDER REIMBURSEMENT AND PAYOR STRATEGY

- Represents providers in reimbursement disputes involving commercial insurers, including underpayment matters, network adequacy issues, and single case agreement reimbursement disputes.
- Advises clinically integrated networks and provider organizations on governance, performance incentives, quality improvement initiatives, and value-based reimbursement arrangements.
- 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.
- 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.

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Experience

- Counsels clients through reimbursement and overpayment audits and assists clients with claims reimbursement issues.

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

Community Leadership

- Madam President Camp, Board Member

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

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2025 Pro Bono Contributor

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