



SARAH CHARLES WRIGHT

Member

swright@sturgillturner.com

EDUCATION

University of Louisville, J.D. (1987)

University of Kentucky, B.A. (1980)

SERVICE AREAS

Bankruptcy

Business Services

Health Care Law

Managed Care Law

AFFILIATIONS

American Health Lawyers Association,
Managed Care Section

Fayette County Bar Association, Health
Care Section

Kentucky Bar Association, Health Care,
Business Law and Bankruptcy Sections

Kentucky Chamber of Commerce Health
Care Policy Council

COMMUNITY OUTREACH

The Well of Lexington, Past President
and current member, Board of Directors

Lexington Chamber Music Festival, Past
member Board of Directors

Episcopal Church of the Good Shepherd,
Past Junior Warden and Vestry member

Lexington Art League, Past President,
Vice President and member Board of
Directors

Sarah Charles Wright is an experienced health care and corporate law attorney providing legal counsel on a broad range of matters to managed care organizations, third party administrators, self-funded employee welfare benefit plans, hospital systems, providers and provider networks, utilization review agents, physician groups, and business entities that support the health care industry. A significant portion of her practice involves drafting and negotiating managed care industry contracts, policies and forms for health care clients and advising them on state and federal regulatory compliance matters, including state insurance laws, Medicare, Medicaid, ERISA, the Affordable Care Act, and HIPAA. Additionally, Sarah Charles is experienced in forming business and professional entities and in representing creditors in bankruptcy cases.

EXPERIENCE

Drafts, reviews and negotiates numerous health care industry agreements including for:

- Provider Participation in commercial provider networks, Accountable Care Organizations and Medicare Advantage Organizations
- ERISA Summary Plan Descriptions
- Network Lease Arrangements
- Healthcare IT Licensing and Administrative Services
- HIPAA Business Associates and Trading Partners
- Third Party Administration for ERISA Regulated Employee Group Health Plans
- Utilization Management
- Data Analytics
- NCQA Delegation (credentialing, utilization review, quality improvement)
- Value-based Provider Compensation
- Certificates of Coverage
- Employer Group Health Insurance Contracts
- Pharmacy Benefits Management including Medicare Part D
- Non-disclosure / Non-competition / Non-solicitation
- Physician Employment and Subcontracting arrangements for Fraud and Abuse Compliance

Drafts organizational documents including corporate articles, bylaws and operating agreements for business, professional and non-profit entities;

Drafts employee handbooks and employment contracts for commercial and non-profit entities;

Has advised clients regarding:

- Licensing software and other intellectual property rights
- Department of Labor group health plan audits
- Internal regulatory compliance/whistleblower complaints
- Medicaid Waiver program compliance
- Physician peer review
- Medicare Advantage compliance
- Sale of physician practice
- Physician and hospital fraud and abuse compliance in employment and other contractual arrangements
- Physician exclusion and CMS post-exclusion reinstatement
- Medicare compliance and multi-state contracting for long-term acute care facilities
- Medicare change of ownership rules
- Health care clients' rights as creditors in bankruptcy proceedings
- Physician practice legal and ethical obligations

PUBLICATIONS

New Kentucky Legislation Clears State Law Barriers to Direct Primary Care Practice Model, *M.D. Update* (November 2017)

Fair Market Value in Physician Compensation Arrangements under the Stark Law, *M.D. Update* (January 2016)

Treating Patients by Telehealth in Kentucky, *M.D. Update* (November 2014)

Buying and Selling a Physician Practice, *M.D. Update* (December 2013)

Patient-Centered Medical Homes—Are you eligible?, *M.D. Update* (April 2013)

How the ACA will Affect your Small Business, *Business Lexington* (January 2013)

SEMINARS

How to Manage a Compliant Health Benefit Plan: DOL Audits & Fiduciary Responsibility (February 2018)