

# Jennifer L. Evans

SHAREHOLDER

she / her / hers

Denver, CO | 303.583.8211

[jevans@polsinelli.com](mailto:jevans@polsinelli.com)



Jennifer Evans is a shareholder in the Health Care Department and head of the firm's Health Care Compliance practice. Her legal practice is focused on fraud and abuse, Medicare and Medicaid reimbursement and regulatory compliance. She advises large health systems, emerging companies in health care and entities focused on behavioral health serving commercial and safety net patients.

Jennifer served as Deputy Director of the Colorado Department of Health Care Policy and Financing, the single state agency responsible for administering Medicaid and the CHP+ programs. At Colorado Medicaid she was responsible for Administration & Operations including audit, program integrity, provider enrollment, claims payment and information technology. Jennifer previously served as Legislative Director and Legislative Assistant for Health Care in the U.S. Senate and U.S. House of Representatives.

She is a Member of the Board of Directors of the following: American Health Law Association (AHLA), Denver Public Schools Foundation and the Denver Metro Chamber of Commerce.

## Education

- University of Colorado Law School (J.D., 1998)
- University of Colorado Boulder (B.A., 1991)
- Boston University, London Programme (1989)

## Bar Admissions

- Colorado

## Memberships

- American Health Law Association (AHLA)
  - Board of Directors
  - Former Program Committee, Institute on Medicare and Medicaid Reimbursement

## Capabilities

- Behavioral Health
- Health Care Compliance
- False Claims Act Defense
- Health Care
- Reimbursement Audits & Disputes
- Pharmacy
- Public Policy
- Health Care Reimbursement
- Post Chevron Educational Resources & Updates
- Government Investigations

## Civic Involvement

- Denver Public Schools Foundation, Board member
- Denver Metro Chamber of Commerce
  - Board of Directors
  - Health Care Committee, Former Co-Chair
- Member of Transition Subcommittee on Health and Human Services for Governor Elect Jared Polis and the Polis-Primavera Administration
- Member of Transition Subcommittee on Health and Human Services for Governor Elect John Hickenlooper

## Recognition

- 2023 University of Colorado Law School Alumni Award - Distinguished Achievement —Private Practice
- Named a Colorado Women's Bar Association 2022 Raising the Bar Honoree
- Named to *5280 Magazine's* "Denver's Top Lawyers" list for Health Law, 2022-2026
- Selected for inclusion in *Best Lawyers in America*® for Health Care Law, 2021-2026
- Named Top 25 Most Powerful Women by the Colorado Women's Chamber of Commerce, 2020
- Named Barrister's Best "Best Health Care Lawyer" by *Law Week Colorado*, 2016, 2018, 2019
- Selected as a 2018 Lawyer of the Year by *Law Week Colorado*
- Named in "Denver's Outstanding Woman in Business" by *Denver Business Journal*, 2016
- Named in the Pro Bono Champions Class of 2012 by *American Health Law Association (AHLA)*

## Matters

---

- Secured favorable Advisory Opinion from the HHS/OIG opining that an arrangement would not create prohibited remuneration under the anti-kickback statute, and would not subject a client to administrative sanctions or exclusion from participation in Medicare and Medicaid
- Advising clients on federal health care program reimbursement and payment issues, including Medicare and Medicaid requirements and limitations
- Assisted in development and CMS approval of Medicaid Supplemental Payment Methodologies for physician payment
- Resolution of Medicaid overpayment investigations without imposition of penalties
- Advised hospital associations regarding development and implementation of supplemental payment program through inter-governmental transfer and use of provider fees in the Medicaid program
- Advising clients on fraud and abuse issues and implications of corporate transactions in a variety of forms including joint ventures with physician and hospital referrals, appropriate billing and cost reporting to Medicare and Medicaid, payments to physicians other than referral sources, and overpayment returns to Medicare and Medicaid
- Resolution of Medicaid Supplemental Payment Options
- Defending clients against allegations of fraud and abuse and submission of false claims
- Negotiation of Corporate Integrity Agreements, engagement of Independent Review

- Organizations and implementation of CIA compliance and eventual completion
- Settlement of overpayment allegations by commercial health insurers
- Building and maintaining a compliance program for health care provider to avoid prospective violations of fraud and abuse laws and avoid the submission of false claims
- Integration of US Health Care fraud and abuse compliance with Foreign Corrupt Practices Act compliance
- Advise regarding development of and reporting issues regarding Sunshine Physician Payment Reporting requirements for health care manufacturers
- Operational responsibility for Medicaid claims payment totaling nearly \$4 billion per year
- Negotiation of \$50 million multi-year information technology contract for eligibility determination
- Management of external audit and program integrity contractors

## Publications

---

May 12, 2026

**Federal Scrutiny of State Medicaid Programs and Medicaid Providers Intensifies**

March 5, 2026

**Top Issues in Behavioral Health 2026 Newsletter**

January 20, 2026

**2026 Health Care Reimbursement Newsletter**

January 7, 2026

**Issue Brief: State-Level Medicaid Fraud in Focus**

December 5, 2025

**Autism Therapy Providers Fight Medicaid Rate Cuts in Court**

*Quoted, Behavioral Health Business*

July 7, 2025

**Medina v Planned Parenthood Could Have Implications With Medicaid Funding: Jennifer Evans, JD**

*Featured, American Journal of Managed Care*

July 2, 2025

**Medina v Planned Parenthood Case Reinterprets Any Willing Provider Provision: Jennifer Evans, JD**

*Featured, American Journal of Managed Care*

July 1, 2025

**High Court Ruling Puts Limits On Medicaid Enforcement**

*Quoted, Law360*

April 2, 2025

**HCPF Makes Clarifications to Mandatory Facility-Based Professionals' Reporting Requirements Under Colorado Hospital Discounted Care Law**

March 28, 2025

**As Denver's legal industry booms, can boutique firms defend their niche?**

*Quoted, Denver Business Journal*

February 19, 2025

**Recent Supreme Court Precedents, New Administration Make Their Mark on Health Care Law**

*Quoted, Law Week Colorado*

February 3, 2025

**Federal Grant Funding: A Thaw in the Freeze?**

February 2025

**2025 Health Care Reimbursement Newsletter**

January 28, 2025

**Funding Freeze for Health Care Providers – What You Need to Know**

August 7, 2024

**Top Questions Health Care Providers Should Consider in a Post-Chevron World – A Polsinelli Round Table Discussion**

January 4, 2024

**Reimbursement End-of-Year Highlights**

March 2, 2023

**Polsinelli Top Issues in Behavioral Health 2023 Newsletter**

March 1, 2023

**Health Care Reimbursement and Payor Dispute Update**

October, 2022

**The Legal Practice and Management Report**

*Quoted, Of Counsel*

September 15, 2022

**Health Care Reimbursement and Payor Dispute Update**

September 9, 2022

**How To Be A Good Office Leader Amid Role's Dramatic Shift**

*Featured, Law360*