

# Jennifer L. Osborn

SHAREHOLDER

she / her / hers

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Jennifer Osborn works diligently for insurance companies, third-party administrators, and other regulated entities to further their goals and help them remain compliant within the 50-state regulatory scheme. She focuses on insurance regulatory and compliance issues, with a primary emphasis on health insurance matters.

Jennifer works with many types of insurance-regulated entities, including those in the health care sector, who rely on her for research, advice, strategic counsel, and licensing. These include:

- Insurance Companies and Health Maintenance Organizations (HMOs)
- Third Party Administrators (TPAs)
- Preferred Provider Organizations (PPOs)
- Independent Practice Organizations (IPOs)
- Clinically Integrated Networks (CINs)
- Accountable Care Organizations (ACOs)
- Agents and Agencies
- Utilization Review Organizations (UROs)
- Discount Medical Plan Organizations (DMPOs)
- Pharmacy Benefit Managers (PBMs)

Jennifer is well versed in state health insurance laws and regulations, particularly mandated benefits, and association group insurance laws, as well as federal laws affecting the sale of health insurance, such as PPACA, HIPAA, and ERISA. She also has significant experience with unfair trade practice laws and advertising and marketing requirements, including telemarketing requirements. She regularly handles many types of insurance-related matters, including licensing and registrations; market conduct examinations; audits; national research and compliance projects; contract drafting and review; policy form filing; discontinuance and nonrenewal; and Violent Crime Control Act Issues.

Jennifer has assisted heavily regulated insurance entities comply with privacy requirements since the enactment of Gramm Leach Bliley. She has helped prepare privacy policies, manuals, and training, provided HIPAA advice, and drafted business associate agreements or privacy provisions for many clients. She has also advised clients

## Capabilities

- Insurance
- Third Party Administrator (TPA) Licensing & Compliance Services

regarding insurance regulatory data security requirements.

## Education

- Washburn University School of Law (J.D., *magna cum laude*, 1996)
  - Washburn Law Journal, Notes Editor; GNIP-GNOP Best Comment Award
- Truman State University (B.A., *summa cum laude*, 1993)
  - General Pershing Scholar

## Bar Admissions

- Kansas, 1996
- Missouri, 1997

## Memberships

- Kansas Bar Association
  - Past President, Insurance Section
- The Missouri Bar
- Association of Insurance Compliance Professionals (AICP)
- United Way Young Leaders Society
- Federation of Regulatory Counsel, Inc.

## Recognition

- BV Rated Martindale Hubbell

# Matters

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- Manage multiple national Third Party Administrator licensing and license renewal projects, including projects for offshore clients.
- Provide ongoing regulatory and compliance advice and counsel to national third party administrator clients, including filing requirements, contracts, compliance issues, complaints, audits, investigations, and ERISA issues.
- Analyze application of state insurance laws for large health organizations contemplating forming clinically integrated networks or accountable care organizations in various states to determine whether state insurance laws may require licensure or registration. Assist other entities forming provider networks to comply with preferred provider organization (PPO) or intermediary licensure or registration requirements.
- Provide regulatory advice and counsel to pharmacy benefit managers (PBMs), including assistance with licensing, compliance, contract drafting and negotiations, and regulatory inquiries.
- Provide licensing and regulatory advice and counsel to national DMPOs, including review of sales and marketing materials.
- Provide licensing and regulatory advice and counsel to national utilization review organizations.
- Provided regulatory advice and counsel to numerous insurance company clients with respect to various market conduct examinations, including several multi-state or national market conduct examinations.
- Served as regulatory counsel for a health insurer and HMO offering on and off

Exchange plans, including annually updating policy forms, providing advice regarding the application of health insurance laws and the ACA, and assisted with responses to complaints and DOI inquiries.

- Drafted and filed amendatory endorsements and conducted national nonrenewal and market exit of grandfathered health insurance plans on behalf health insurance company.
- Led team that updated national health insurer's compliance database to incorporate all state mandated benefits and to address jurisdictional issues.
- Conducted review of national health insurer's sales and marketing materials, including field-created ads, on a 50-state basis.