

# Kathleen Snow Sutton

SHAREHOLDER

she / her / hers

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Kathleen Sutton partners with health care providers to design compliant, business-forward structures and strategies, advising on the evolving regulatory, reimbursement and operational issues that shape care delivery.

Kathleen counsels hospitals, health systems, academic medical centers, physician groups, digital health companies and behavioral health providers on fraud and abuse compliance (including the Stark Law, Anti-Kickback Statute and False Claims Act); state licensing and professional regulation; Medicare and Medicaid enrollment and reimbursement; and graduate medical education matters.

She helps clients develop innovative care models and value-based arrangements. Drawing on her background in law and health care business development, she offers practical, forward-looking solutions that align legal requirements with long-term strategic goals.

Kathleen frequently works at the intersection of regulation and innovation, helping clients evaluate new payment models, implement technology-enabled solutions and respond to emerging compliance risks. Kathleen also provides thought leadership on reimbursement, behavioral health, value-based care design, and the evolving role of artificial intelligence in health care operations and compliance. Kathleen serves as an adjunct faculty member at the University of Colorado Law School, teaching Corporate Transactions in Health Law.

Before entering private practice, Kathleen worked with health care organizations on business development and strategic initiatives, giving her a practical perspective on aligning legal frameworks with business objectives. Kathleen began her legal career as a judicial clerk for Chief Justice Nancy Rice on the Colorado Supreme Court.

## Education

- University of Colorado Law School (J.D.)
  - Order of the Coif; Editor-in-Chief, University of Colorado Law Review
- University of Denver (B.A., *Economics*, 2009)
  - cum laude, University Honors

## Capabilities

- Health Care
- Value-Based Innovation & Clinical Integration
- Health Care Compliance
- Licensure, Enrollment & Certification
- Health Care Reimbursement
- Telehealth
- Digital Health
- Behavioral Health
- Academic Medical Centers
- Physician Organizations

## Bar Admissions

- Colorado

## Memberships

- Colorado Bar Association
  - Member, Chair, 2024-2025
- Denver Bar Association
  - Member
- American Health Lawyers Association
- University of Colorado Law Review Alumni Board Member
- Colorado Women's Chamber of Commerce Women of Impact and Influence Leadership Program Class of 2021

## Recognition

- Named one of *Best Lawyers: Ones to Watch® in America* in Health Care Law, 2022-2026

# Matters

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- Counseled an innovative mental health company on nationwide teletherapy expansion, addressing 50-state regulatory compliance.
- Developed comprehensive guidance for a health system on implementing AI tools, addressing both administrative and clinical applications.
- Assessed state laws on licensing, scope of practice, supervision, and other regulatory factors for medical spa expansion.
- Provided regulatory guidance for the acquisition of a value-based, integrated care delivery network.
- Advised on health care considerations in the merger of high-acuity, in-home medical care and hospital-at-home providers.
- Developed structure and agreements for CMS innovation model participants.
- Reviewed physician arrangements for Stark Law compliance and supported self-disclosure processes.
- Created Compliance Program structure and policies for roll-out to platform health care provider organizations.

# Publications

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March 5, 2026

**Top Issues in Behavioral Health 2026 Newsletter**

September 17, 2025

**\$50 Billion Rural Health Fund: State Applications Now Open, Provider Input Urged**

July 30, 2025

**Virtual Oversight, Real Impacts: “Incident-To” and Beyond in CMS’s CY 2026 PFS Proposed Rule**

July 16, 2025

**CMS Proposes New Mandatory, Two-Sided Risk Model for Heart Failure and Low Back Pain**

August 7, 2024

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

March 8, 2024

**Top Issues in Behavioral Health Newsletter 2024**

January 4, 2024

**Reimbursement End-of-Year Highlights**

March 2, 2023

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

August 2, 2022

**Telehealth: CMS Proposes to Discontinue Audio-Only E/M Services and Virtual Direct Supervision in 2023 Proposed Rule**