

Kyle A. Vasquez

SHAREHOLDER

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Kyle Vasquez maintains a national health care practice and provides pragmatic legal and compliance support to a wide range of health care clients. He utilizes his background in health law and his prior experience as a health care consultant to develop creative approaches to complex issues. Kyle provides 340B drug pricing program, reimbursement, licensing/certification, DEA and other regulatory support to a broad set of health care entities including academic medical centers, multi-hospital health systems, community hospitals, FQHCs, institutional and retail pharmacies, and physician practices, among others.

Kyle's areas of focus include:

- Providing 340B regulatory, compliance, audit, repayment, self-disclosure, litigation and contract support to Covered Entities, Contract Pharmacies, and other key stakeholders.
- Advising on multi-state telehealth and telepharmacy matters, including assisting with state licensing, controlled substance and DEA obligations.
- Counseling various provider types on complex healthcare reimbursement and cost report matters, including Medicare, Medicaid, and private payor reimbursement, to ensure consistent cash flow and compliance with applicable rules.
- Assisting multiple provider/supplier types with provider enrollment, licensing and certification matters.
- Structuring and negotiating a variety of transactions, including provider-based conversions, physician practice acquisitions, joint ventures, joint operating agreements, mergers, and acquisitions.
- Assisting providers with administrative appeals, reconsideration requests, and other litigation strategies regarding adverse government agency findings.
- Assisting with self-disclosures, government audits, and appeals of audit findings.
- Assisting providers and pharmacies with complex payor credentialing and negotiation matters, including navigating HEAT Zones credentialing issues and negotiating 340B drug pricing program, mail order, and central fill terms with the nation's largest PBMs.
- Assisting pharmacies with compliance and dispute matters pertaining to PBM restrictions, including mail order restrictions.
- Advising providers and pharmacies on a variety of litigation options pertaining to health plans, PBMs and government agencies.

Capabilities

- 340B Drug Pricing Program
- Academic Medical Centers
- Health Care
- Hospitals & Health Systems
- Reimbursement Audits & Disputes
- Health Care Reimbursement
- Pharmacy
- Managed Care & Payor Disputes
- Post Chevron Educational Resources & Updates

Education

- Loyola University Chicago School of Law (LL.M., 2007)
 - Health Law
 - Health Law; CALI Award
- UIC John Marshall Law School (J.D., 2006)
 - Dean's List; Moot Court Council; Dean Herzog Moot Court Competition First Place Overall
- University of Illinois (B.A., 2003)
 - Economics

Bar Admissions

- Illinois, 2006

Court Admissions

- U.S. District Court, Northern District of Illinois

Memberships

- American Bar Association
 - Health Law Section
- American Health Lawyers Association
- Chicago Bar Association
- Illinois Association of Healthcare Attorneys
 - Education Committee
 - Mentor

Recognition

- Selected for inclusion in *Best Lawyers in America*® for Health Care Law, 2024-2026

Matters

- Represented 340B Covered Entities in matters against drug manufacturers to successfully obtain access to limited distribution drugs at the 340B ceiling price, and represented 340B Covered Entities in their pursuit of refunds from manufacturers that previously charged prices that exceeded the statutory 340B ceiling price
- Advised several academic medical centers on telehealth matters for COVID and post-COVID operations, including an analysis of state and federal controlled substance rules and registration requirements for multi-state operations
- Assisted accountable care organization entity with development of strategic 340B model
- Represented Section 318 clinic in litigation related to 340B drug pricing agreements
- Assisted 340B Covered Entity with regulatory considerations when developing transplant outreach sites
- Assisted with development of new hospital cancer center participating in the 340B program including assistance with definitive documents related to partnership with local oncology group

- Assisted academic medical center with the development of an in-house specialty pharmacy
- Successfully represented several 340B Covered Entities during Office of Pharmacy Affairs 340B audits and mitigated audit findings; prepared and implemented OPA-approved Corrective Action Plans and assisted Covered Entities with manufacturer repayments
- Performed independent 340B audit readiness reviews of a number of 340B Covered Entities and developed internal Corrective Action Plans
- Defended hospital in whistleblower false claims act action related to 340B matters

Publications

April 13, 2026

2026 340B Program Update – 340B Rebate Model RFI Comments Due and Manufacturers Continue Restricting 340B Pricing

February 4, 2026

Mandatory Provider-Based Attestations Make a Comeback

January 20, 2026

2026 Health Care Reimbursement Newsletter

November 26, 2025

What 340B Hospitals Need to Know About CMS's CY 2026 OPPS Final Rule

October 31, 2025

Ready or Not: HRSA's 340B Rebate Pilot Model Takes Off Despite Questions on Readiness and Authority

August 7, 2025

The 340B Rebate Pilot: Voluntary for Manufacturers, Costly for 340B Covered Entities

April 24, 2025

Drug Pricing and Payment Executive Order Shows Trump Administration's Cards

February 2025

2025 Health Care Reimbursement Newsletter

April 19, 2024

HRSA Aims for Swift Dispute Resolution with new 340B ADR Final Rule

January 4, 2024

Reimbursement End-of-Year Highlights

July 11, 2023

CMS Proposes \$9B in Relief for 340B Hospitals

March 1, 2023

Health Care Reimbursement and Payor Dispute Update

December 19, 2022

340B Hospital Reimbursement Update – Underpayments and the Need to Act Now

July 19, 2022

SCOTUS 340B Decision Drives CMS to Restore Part B 340B Payments and Seek Comments on Remedies in the CY 2023 OPPS Proposed Rule

June 16, 2022

SCOTUS Sides with 340B Hospitals and Denies CMS's Attempt to Cut Reimbursement for 340B Drugs