

TennCare

Fiscal Year 2012-2013 Annual Report



TennCare is the state of Tennessee's Medicaid program that provides health care for approximately 1.4 million Tennesseans and operates with an annual budget of approximately \$10.3 billion. TennCare members are primarily low-income pregnant women, children and individuals who are elderly or have a disability. TennCare covers approximately 20 percent of the state's population, 50 percent of the state's births, and 50 percent of the state's children.

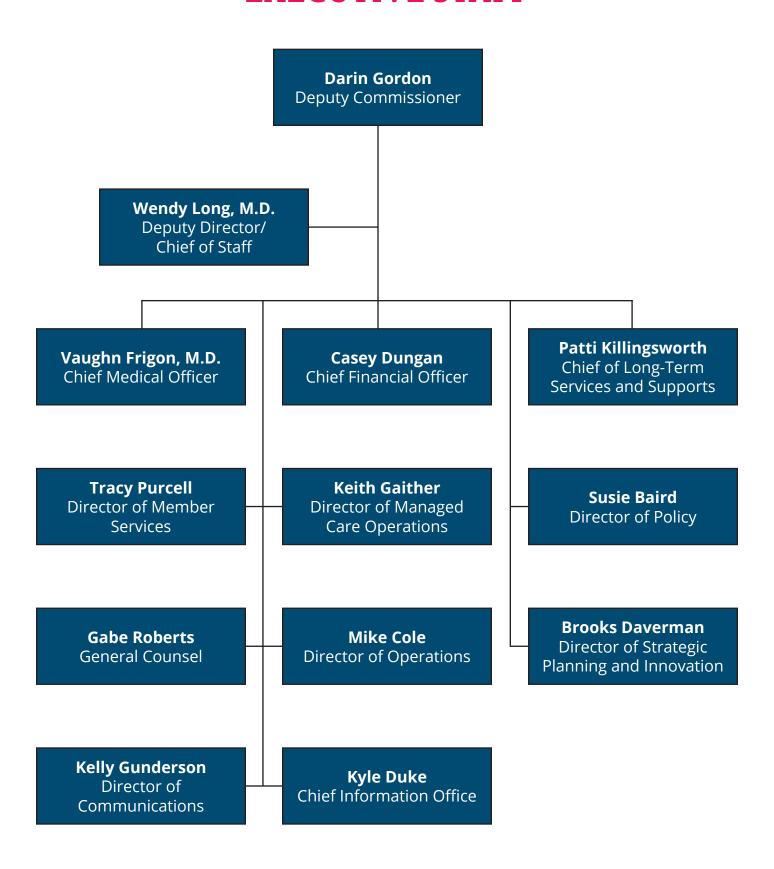
TennCare is one of the oldest Medicaid managed care programs in the country, having begun on January 1, 1994. It is the only program in the nation to enroll the entire state's Medicaid population in managed care. The TennCare program operates under a Section 1115 waiver from the Centers for Medicare and Medicaid Services (CMS) in the United States Department of Health and Human Services. Unlike traditional fee-for-service Medicaid, TennCare is an integrated, full-risk, managed care program. TennCare services are offered through managed care entities. Medical, behavioral and Long-Term Services and Supports are covered by "at-risk" Managed Care Organizations (MCOs). All of TennCare's MCOs are ranked among the top 100 Medicaid health plans in the country.

The care provided by TennCare's MCOs is assessed annually by the National Committee for Quality Assurance (NCQA) as part of the state's accreditation process. In addition to the MCOs, there is a Pharmacy Benefits Manager for coverage of prescription drugs and a Dental Benefits Manager for coverage of dental services to children under age 21. As a leader in managed care Long-Term Services and Supports (LTSS), the state successfully implemented TennCare CHOICES in 2010 bringing LTSS into the managed care model. These services are provided in Nursing Facilities (NFs) and Intermediate Care Facilities for persons with intellectual disabilities (ICF/IID), as well as by Home and Community Based Service providers.

The Bureau of TennCare is within Health Care Finance and Administration (HCFA). The Department of Finance and Administration is the state agency charged with the responsibility of administering HCFA and the TennCare program. In addition to the Bureau of TennCare, HCFA includes the Cover Tennessee programs, the Strategic Planning and Innovation Group – which oversees the Tennessee Health Care Innovation Initiative, and the Office of eHealth Initiatives.



EXECUTIVE STAFF

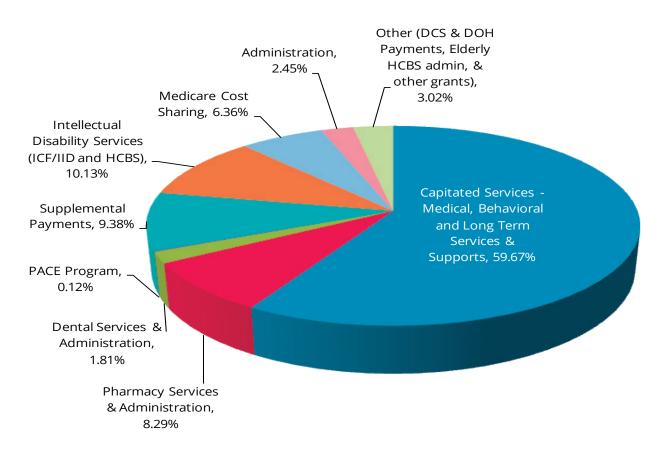


FY 13 Expenditures by Category

Capitated Services - Medical, Behavioral and Long Term Services & Supports ¹	\$5,492,872,900
Pharmacy Services & Administration	778,816,100
Dental Services & Administration	170,153,900
PACE Program	11,166,500
Supplemental Payments	882,065,500
Intellectual Disability Services (ICF/IID and HCBS)	951,849,900
Medicare Cost Sharing ²	598,158,400
Administration ³	230,254,700
Other (DCS & DOH Payments, Elderly HCBS admin, & other grants)	284,019,800
Total	\$9.399.357.700

^{1.} This figure is the total of capitation payments which is inclusive of all medical and behavioral health services as well as the long term services and supports for CHOICES members.

- 2. Includes Medicare Part D Clawback.
- 3. Administration includes funding for eligibility determination by DHS in all county offices.



Enrollment and Program Expenditures

Enrollment by Eligibility Race and Age

Enrollment on January 1, 2013

Race	0 to 20	21 to 64	65 +	Grand Total
Black	226,100	119,863	13,837	359,800
Hispanic	62,932	4,837	464	68,233
Other	64,659	43,699	7,719	116,077
White	387,787	248,928	46,097	682,812
Grand Total	741,478	417,327	68,117	1,226,922

CHOICES Enrollment

Category of Service	Number of Recipients (6/30/12)	Number of Recipients (6/30/13)	% Change
Home and Community Based Services	10,367	12,372	19%
Nursing Facility Services	21,549	19,498	-10%

Medical Services

Providers with	FY13 Recipients	Expenditures	FY13	
Paid Claims		Per Recipient	Expenditures¹	
26,656	1,114,094	\$2,966.38	\$3,304,821,787	

^{1.} Total expenditure includes the total of administration fees paid to contracted MCO's, based on the allocated proportion of total Medical and Behavioral Health expenditure incurred in SFY13.

Mental Health Clinics and Institutional Services

Providers with	FY13 Recipients	Expenditures	FY13
Paid Claims		Per Recipient	Expenditures ^{1, 2}
7,641	224,341	\$1,722.57	\$386,443,687

^{1.} Excludes case management services, transportation and other community services where payment to provider was a capitated arrangement.

Pharmacy Services

Services Delivered through Pharmacy Benefits Manager (PBM)

Providers with Paid Claims FY13 Recipients		FY13 Recipients	Expenditures Per Recipient	FY 13 Expenditures ¹
	10,516	940,356	\$828.21	\$778,816,100

^{1.} Amount includes administrative costs paid to the PBM.

Dental Services

Services Delivered through the Dental Benefits Manager (DBM)

Providers with	FY13 Recipients	Expenditures	FY13	
Paid Claims		Per Recipient	Expenditures¹	
1,292	393,122	\$432.83	\$170,153,900	

^{1.} Amount includes administrative costs but does not include Health Department Dental Program cost of \$6,069,700 which is included on page 1 in the Other (DCS & DOH Payments, Elderly HCBS admin, & other grants) category.

^{2.} Total expenditure includes the total of administration fees paid to contracted MCO's, based on the allocated proportion of total medical and behavioral health expenditure incurred in SFY13.

TennCare Expenditures and Recipients by County

County	Enrollment on 1-Jan-13	Estimated 2013 Polpulation	% of County on TennCare	Total Service Expenditure ¹	Expenditure per Member
Anderson	13,905	75,542	18.4%	\$94,900,357	\$6,825
Bedford	10,754	45,901	23.4%	\$56,429,238	\$5,247
Benton	3,459	16,290	21.2%	\$26,967,239	\$7,796
Bledsoe	2,873	12,841	22.4%	\$14,523,066	\$5,055
Blount	18,572	125,099	14.8%	\$120,079,047	\$6,466
Bradley	17,987	101,848	17.7%	\$110,430,122	\$6,139
Campbell	11,748	40,238	29.2%	\$72,094,376	\$6,137
Cannon	2,651	13,775	19.2%	\$16,100,102	\$6,073
Carroll	6,743	28,513	23.6%	\$44,361,561	\$6,579
Carter	11,080	57,338	19.3%	\$67,138,742	\$6,059
Cheatham	6,131	39,492	15.5%	\$40,329,289	\$6,578
Chester	3,397	17,321	19.6%	\$18,045,914	\$5,312
Claiborne	7,864	31,560	24.9%	\$46,066,998	\$5,858
Clay	1,908	7,774	24.5%	\$12,657,567	\$6,634
Cocke	9,899	35,479	27.9%	\$56,717,350	\$5,730
Coffee	11,118	53,357	20.8%	\$63,739,868	\$5,733
Crockett	3,484	14,591	23.9%	\$22,216,207	\$6,377
Cumberland	10,438	57,466	18.2%	\$68,307,226	\$6,544
Davidson	118,106	658,602	17.9%	\$735,523,568	\$6,228
Decatur	2,437	11,661	20.9%	\$17,675,878	\$7,253
DeKalb	4,384	19,164	22.9%	\$27,151,742	\$6,193
Dickson	9,167	50,266	18.2%	\$64,993,090	\$7,090
Dyer	9,314	38,213	24.4%	\$51,590,903	\$5,539
Fayette	5,725	38,690	14.8%	\$33,745,392	\$5,894
Fentress	5,390	17,909	30.1%	\$38,871,918	\$7,212
Franklin	6,441	41,129	15.7%	\$40,585,677	\$6,301
Gibson	11,240	49,457	22.7%	\$91,794,497	\$8,167
Giles	5,284	28,746	18.4%	\$34,904,156	\$6,606
Grainger	5,140	22,702	22.6%	\$27,168,142	\$5,286
Greene ²	12,850	68,267	18.8%	\$186,128,267	\$14,485
Grundy	4,424	13,498	32.8%	\$28,521,085	\$6,447
Hamblen	13,219	63,074	21.0%	\$83,746,187	\$6,335
Hamilton	55,757	348,673	16.0%	\$350,485,463	\$6,286
Hancock	2,184	6,679	32.7%	\$12,583,139	\$5,762

TennCare Expenditures and Recipients by County

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County	Enrollment on 1-Jan-13	Estimated 2013 Polpulation	% of County on TennCare	Total Service Expenditure ¹	Expenditure per Member
Hardeman	6,261	26,306	23.8%	\$45,460,736	\$7,261
Hardin	6,268	26,034	24.1%	\$41,958,245	\$6,694
Hawkins	11,731	56,800	20.7%	\$67,450,719	\$5,750
Haywood	5,239	18,224	28.7%	\$28,886,017	\$5,514
Henderson	6,145	28,048	21.9%	\$38,404,437	\$6,250
Henry	6,856	32,210	21.3%	\$39,862,452	\$5,814
Hickman	5,386	24,267	22.2%	\$31,430,820	\$5,836
Houston	1,706	8,292	20.6%	\$13,977,178	\$8,193
Humphreys	3,531	18,243	19.4%	\$24,850,706	\$7,038
Jackson	2,539	11,517	22.0%	\$15,489,734	\$6,101
Jefferson	9,999	52,123	19.2%	\$64,447,022	\$6,445
Johnson	3,861	17,977	21.5%	\$20,707,996	\$5,363
Knox	62,962	444,622	14.2%	\$418,401,176	\$6,645
Lake	1,940	7,731	25.1%	\$12,906,978	\$6,653
Lauderdale	7,124	27,795	25.6%	\$37,537,297	\$5,269
Lawrence	8,752	41,990	20.8%	\$60,316,361	\$6,892
Lewis	2,588	11,961	21.6%	\$18,763,906	\$7,250
Lincoln	6,398	33,633	19.0%	\$36,191,600	\$5,657
Loudon	7,050	50,448	14.0%	\$50,724,501	\$7,195
Macon	5,834	22,701	25.7%	\$33,321,595	\$5,712
Madison	20,828	98,733	21.1%	\$155,720,470	\$7,476
Marion	6,227	28,374	21.9%	\$37,254,694	\$5,983
Marshall	5,675	31,130	18.2%	\$34,608,630	\$6,098
Maury	15,048	83,761	18.0%	\$109,045,569	\$7,247
McMinn	10,296	52,341	19.7%	\$64,446,431	\$6,259
McNairy	6,893	26,140	26.4%	\$41,936,590	\$6,084
Meigs	2,675	11,649	23.0%	\$12,506,100	\$4,675
Monroe	9,810	45,265	21.7%	\$56,034,591	\$5,712
Montgomery	23,163	184,119	12.6%	\$132,995,720	\$5,742
Moore	803	6,301	12.7%	\$5,457,025	\$6,796
Morgan	4,172	21,915	19.0%	\$25,512,574	\$6,115
Obion	6,415	31,131	20.6%	\$36,084,809	\$5,625
Overton	4,360	22,075	19.8%	\$26,356,829	\$6,045
Perry	1,835	7,869	23.3%	\$11,076,078	\$6,036

TennCare Expenditures and Recipients by County

County	Enrollment on 1-Jan-13	Estimated 2013 Polpulation	% of County on TennCare	Total Service Expenditure¹	Expenditure per Member
Pickett	970	5,090	19.1%	\$6,346,526	\$6,543
Polk	3,477	16,690	20.8%	\$16,265,540	\$4,678
Putnam	14,247	73,525	19.4%	\$103,325,561	\$7,252
Rhea	8,027	32,513	24.7%	\$48,561,237	\$6,050
Roane	9,845	53,047	18.6%	\$76,033,460	\$7,723
Robertson	11,276	67,383	16.7%	\$68,965,393	\$6,116
Rutherford	37,252	281,029	13.3%	\$215,298,666	\$5,780
Scott	7,168	22,015	32.6%	\$44,094,889	\$6,152
Sequatchie	3,412	14,681	23.2%	\$17,489,858	\$5,126
Sevier	15,031	93,570	16.1%	\$75,895,524	\$5,049
Shelby	228,744	939,465	24.3%	\$1,226,119,964	\$5,360
Smith	3,686	19,074	19.3%	\$23,080,022	\$6,262
Stewart	2,499	13,362	18.7%	\$15,433,557	\$6,176
Sullivan	27,179	156,595	17.4%	\$167,195,957	\$6,152
Sumner	23,368	168,888	13.8%	\$133,176,770	\$5,699
Tipton	11,661	61,586	18.9%	\$59,973,849	\$5,143
Trousdale	1,651	7,828	21.1%	\$12,578,736	\$7,619
Unicoi	3,582	18,082	19.8%	\$25,951,016	\$7,245
Union	4,398	19,102	23.0%	\$24,958,226	\$5,675
Van Buren	1,170	5,583	21.0%	\$11,128,972	\$9,512
Warren	9,390	39,965	23.5%	\$66,146,450	\$7,044
Washington	19,016	125,546	15.1%	\$130,466,794	\$6,861
Wayne	2,859	16,939	16.9%	\$23,500,166	\$8,220
Weakley	6,258	34,450	18.2%	\$42,214,147	\$6,746
White	5,986	26,244	22.8%	\$40,522,844	\$6,770
Williamson	8,376	198,901	4.2%	\$64,055,205	\$7,647
Wilson	14,509	121,945	11.9%	\$100,234,706	\$6,908
Other ³	26,442			\$116,518,411	\$4,407
Total	1,226,922	6,495,978	19%	\$7,582,231,400	\$6,180

^{1.} Service Expenditures include Medical, Pharmacy, Long-Term Services and Supports, Dental, Behavioral Health Services, MCO administrative costs and Part D payments on behalf of Dual eligible members. Payments on behalf of Dual eligible members for Part D drug coverage totaled \$170,053,900. ASO administration and Part D payments were allocated across counties relative to the county's proportion of total expenditure.

^{2.} Greene County expenditures include costs associated with the Greene Valley Developmental Center, causing the per-member cost to appear higher when comparing it with those of the other counties.

^{3.} This category reflects recipients who are Tennessee residents for which their domicile is temporarily located outside of the state.

Milestones FY 2012-2013

Renewal of TennCare Demonstration Waiver

Unlike traditional fee-for-service Medicaid programs, TennCare is a demonstration project. In exchange for a waiver of certain federal statutes and regulations governing Medicaid, TennCare "demonstrates" the principle that a managed care approach to health care can result in a more efficient use of resources, thereby allowing the state to extend coverage to people who would not otherwise be eligible for Medicaid.

One limitation imposed on demonstration projects, however, is that they may operate only during "approval periods" before being renewed. The Bureau of TennCare filed its renewal application with the

Centers for Medicare and Medicaid Services (CMS) on June 29, 2012, to comply with provisions in federal regulation and the Waiver agreement requiring submission a year in advance. Following extensive negotiations between the two parties throughout the second half of 2012, CMS notified the Bureau on December 31, 2012, that a three-year renewal of the TennCare Waiver had been approved. remains committed to improving the quality and costeffectiveness of care for dual eligibles in Tennessee and is moving forward on plans to improve coordination of care within the existing Medicare Part C authority.

John B. Consent Decree

The John B. lawsuit addresses the adequacy of services provided by TennCare to children under the age of 21. John B. was a consent decree filed in 1998 that has been the subject of ongoing litigation since 2000. In February 2012, Judge Thomas A. Wiseman, Jr. ruled in favor of the state by dismissing the case on the grounds that TennCare had successfully established compliance with "all the binding provisions of the Consent Decree."

> In response, the plaintiffs filed a Notice of Appeal with the United States Court of Appeals for the Sixth Circuit on March 9, 2012. A threejudge panel of the Sixth Circuit heard oral arguments on the appeal on October 5, 2012. Plaintiffs and defendants subsequently filed supplemental briefs on the subject of TennCare's periodicity schedule; a timeline identifying the points

in a child enrollee's life when the state must provide

screenings and diagnostic and treatment services. On March 14, 2013, the Sixth Circuit issued a

unanimous opinion upholding Judge Wiseman's decision to dismiss the John B. case. The 27-page ruling examined all of the arguments advanced by the plaintiffs in their March 2012 appeal and classified each as either a "misstate[ment of] the bases of the [district] court's decision" or "simply meritless." Acknowledging that Judge Wiseman had made one technical error with regard to the number of periodic screens that TennCare should have conducted during the previous year, the mistake was ultimately found to be "harmless" because TennCare had achieved full compliance with

Dual Demonstration Proposal

On May 17, 2012, TennCare submitted a proposal to the Medicare Medicaid Coordination Office to consolidate services for individuals who are dually eligible for Medicare and Medicaid. During the months that followed, Bureau management developed several concerns about the project, including the methodology by which Tennessee health plans would be reimbursed, key policy decisions that could impede the effectiveness of the project, and delays that would make it difficult, if not impossible, for the state to achieve success within the prescribed timeframes. Therefore, on December 21, 2012, the Bureau withdrew its proposal. TennCare

relevant federal law.

New Pharmacy Benefits Manager

Following a competitive bidding process in which three companies submitted proposals, TennCare named Magellan Health Services the program's new Pharmacy Benefits Manager (PBM) on November 6, 2012. Magellan will replace Catamaran (formerly SXC Health Solutions), which has held the role since 2008. Although Magellan will not start processing claims for TennCare until June 1, 2013, the company began preparations in December 2012. Priorities during this period of transition include the following:

- Establishing a pharmacy networkVerification of enrollee eligibility for providers who inquire
- Building a claims processing system and loading it with enrollee information and with edits specific to TennCare's preferred drug list, prior authorization program, and clinical/quantity requirementsResponding to inquiries about

the Electronic Health Records (EHR) program

- Creating a call center and a website to assist patients and providers
- Contracting with drug manufacturers for supplemental rebates

TennCare's contract with Magellan lasts through May 31, 2016, and contains an option for two one-year extensions.

Eligibility Determination System

On May 8, 2012, TennCare issued a Request for Proposal (RFP) to design, develop, and implement a new eligibility determination system for Tennessee's Medicaid and CHIP programs. The RFP invited qualified businesses to submit proposals for a system that could ensure the state's continued compliance with federal law and regulations.

One of the central benefits envisioned in the new system is that historically paper-based and/or in-person transactions—such as applications for benefits and the

reporting of status changes—will be conducted through an online portal. Although a basic online application currently exists, the new system will be capable of making eligibility determinations in real time or near real time.

After receiving and reviewing five proposals, TennCare awarded the contract to the Northrop Grumman Corporation on November 9, 2012.

Catalyst for Payment Reform

On December 19, 2012, TennCare announced its decision to join Catalyst for Payment Reform (CPR). CPR is a national independent organization led by large purchasers of health insurance with active involvement of providers, health plans, consumers, and labor groups working to improve health care quality and reduce costs by identifying and coordinating workable solutions to improve how health care is paid for in the

United States.

TennCare joins more than 20 other large purchasers of health insurance in this effort. This includes companies such as FedEx, GE, Intel, Verizon, Xerox, 3M and Walmart, as well as Medicaid programs in South Carolina and Ohio. Purchasing partners interact on a regular basis with major

health insurance companies such as Aetna, CIGNA, UnitedHealthcare, and WellPoint to discuss progress in advancing innovations, paying for value, and aligning payments with purchaser goals.

CPR provides member organizations with resources such as market assessment tools, model health plan contract language, action briefs, a payment framework, and opportunities to collaborate and share best practices with other CPR member organizations. The members of CPR share a common interest in designing payment methodologies that cut waste and reflect performance, create alignment between purchasers and federal organizations such as CMS and the Department of Health and Human Services,



and implement price transparency and value pricing. TennCare's commitment to CPR includes performing a self-assessment of capabilities and coordination with current plans, using CPR model health plan contract language when appropriate, and participating in coordinated initiatives with other purchasers.

Award for Chief Information Officer

On December 11, 2012, the Information Technology Management Association (ITMA) honored TennCare Chief Information Officer Brent Antony as Outstanding IT Director for 2012.

The ITMA is an organization whose stated mission is to "provide a forum for . . . Information Systems Management professionals to share information relating to their environment and State government" with the ultimate goal of "identifying common concerns, arriving at a consensus, and working toward their resolution."

ITMA recognized Mr. Antony for having made the most significant contribution to the organization based on the agency's strategic plan. Antony, who joined TennCare in 2005, oversees all aspects of the Bureau's information technology systems management. He has been distinguished twice within the field of information technology in as many years. In June 2011, he was named by eMids Technologies and Healthcare Payer News as one of eleven top executives and thought leaders in the healthcare information technology industry.

Amendment 18 Submitted to CMS

On March 7, 2013, the Bureau of TennCare submitted Demonstration Amendment 18 to the Centers for Medicare and Medicaid Services (CMS). The purpose of Amendment 18 is to expand the availability of Assisted Care Living Facility (or "ACLF") services within CHOICES, TennCare's program of long-term services and supports (LTSS) for individuals who are elderly or physically disabled.

An ACLF is a home-like setting—licensed by the Tennessee Department of Health—in which residents

receive an array of services to assist with their activities of daily living. Examples of ACLF services include daily meals, homemaker services (such as sweeping, laundry and washing dishes), and medication oversight. Currently, the ACLF benefit is available only to members of CHOICES Group 2, the portion of the CHOICES population that meets the medical criteria for placement in a Nursing Facility (NF) but that receives Home and Community Based Services (HCBS) as a safe and cost-effective alternative to institutional care.

Amendment 18 proposes to extend coverage of ACLF services to certain members of CHOICES Group 3, which consists of individuals who, in the absence of HCBS, would be "at risk" for placement in a NF. To ensure that overall LTSS expenditures remain unaffected, the benefit will be covered only when the cost of ACLF services would not exceed the amount otherwise spent on HCBS for the individual.

New Chief Medical Officer

On January 28, 2013, Vaughn Frigon, M.D. joined TennCare's Executive Staff in the role of Chief Medical Officer. He fills the position left vacant when Dr. Wendy Long assumed a dual role as TennCare's Deputy Director and Chief of Staff. Dr. Frigon, who is originally from Virginia, graduated from the United States Military Academy at West Point and served in the United States Army Infantry as a platoon leader during the first Persian Gulf War.

After attending medical school at the University of Tennessee's College of Medicine in Memphis, he completed both an Orthopedic Surgery residency at Tulane University, and the Health Care MBA program at Vanderbilt University's Owen Graduate School of Management.

Dr. Frigon is board certified by the American Board of Orthopaedic Surgery and has practiced orthopedics for 12 years. He has also worked as the Lead Medical Director for the Unum Insurance Company in Chattanooga for the last five years. The diversity of his professional experience will be a valuable asset for TennCare.

Higher Reimbursement for Primary Care

One provision of the Affordable Care Act (ACA) with which all Medicaid programs—even those that do not expand eligibility—must comply is an enhanced reimbursement rate for primary care providers during Calendar Years 2013 and 2014. Section 1202 of ACA, "Payments to Primary Care Physicians," requires Medicaid agencies to pay primary care physicians for identified primary care services at a rate no lower than the one at which primary care physicians are reimbursed under Medicare Part B, the "Medical Insurance" portion of Medicare that covers outpatient care. Medicaid providers eligible for the higher levels of reimbursement are those whose primary specialty falls within one of the following categories:

- · Family medicine
- General internal medicine
- · Pediatric medicine
- Related subspecialties

The Bureau of TennCare submitted a State Plan Amendment outlining its compliance with Section 1202 of ACA to CMS on March 27, 2013. Following a two-month period of negotiations, CMS approved the Amendment on

May 29, 2013. While eligible claims could not be paid at the enhanced rate until CMS had issued its approval, retroactive reimbursement will occur automatically, requiring no further action by providers on claims that have already been submitted. TennCare Managed Care Organizations (MCOs) will begin to pay primary care providers the higher rate for current dates of service beginning on August 1, 2013.

New Dental Benefits Manager Contract

Following a competitive bidding process in which four companies submitted proposals, TennCare named DentaQuest USA Insurance Company as its new Dental Benefits Manager (DBM) on April 24, 2013.

DentaQuest was awarded a three-year contract

(containing options for two one-year extensions) that will begin on October 1, 2013. The DentaQuest contract is a partial risk-bearing contract. DentaQuest's responsibilities will include building an adequate network of dentists and administering dental benefits for more than 750,000 children enrolled in TennCare. DentaQuest has experience managing dental benefits for more than 16 million recipients in 26 states.

Health Care Finance and Administration Hires New General Counsel

On April 4, 2013, John G. (Gabe) Roberts joined Health Care Finance and Administration (HCFA) staff as General Counsel. Mr. Roberts, who is originally from Jackson, Mississippi, graduated from the University of Mississippi's E.H. Patterson School of Accountancy and Vanderbilt University Law School. He is a licensed

Certified Public Accountant and, prior to attending law school, worked in the Memphis, Tennessee, office of Ernst & Young as an auditor of both publicly traded and privately held Tennessee companies.

Mr. Roberts comes to HCFA from the Nashville, Tennessee, law firm Sherrard & Roe, where his primary practice

areas included general corporate law, mergers and acquisitions, and private equity investment transactions. While at Sherrard & Roe, his business law practice intersected regularly with the health care industry and regulatory environment.

