

## Rachel O. Freeman

### Associate

Rachel Freeman focuses her practice on advising healthcare providers on operational, transactional and compliance matters including drafting a variety of healthcare contracts and documents. These providers include hospitals, ambulatory surgery centers, physicians, dentists, practices, assisted living facilities, pharmacies, clinical research entities, laboratories and other ancillary service providers. Through her experience with the Anti-Kickback Statue, the Stark Law, HIPAA, EMTALA, and the Food, Drug and Cosmetic Act, among others, Rachel routinely counsels on best practices for health care providers to maintain compliance with the federal and state regulatory frameworks that affect their day-to-day operations. In addition, she represents clients in entity formation, preparation of corporate documents, transactions and private offerings.

Before joining Gray Reed, Rachel served as the compliance and privacy officer of four physician owned hospitals. Additionally, as a consultant, she aided a hospital in navigating the compliance aspects of a physician/hospital co-management agreement. During law school, she was an active member of the SMU Law Review Association, served as the editor of the *SMU Annual Texas Survey* and interned for the Office of General Counsel for the U.S. Department of Health and Human Service.

### Experience

- Representation of emergency services provider in acquisition of assets of six freestanding emergency medical care facilities.
- Representation of physician-owned hospital in successful application for waiver of emergency department requirement by Texas Department of State Health Services.
- Representation of a variety of providers in completion of Medicare and Medicaid Provider Enrollment and Revalidation, as well as regulatory Changes of Ownership.



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**Industries**  
Healthcare

**Practices**  
Healthcare

**Education**  
J.D., *cum laude*, Southern Methodist University Dedman School of Law (2016)  
B.A., *magna cum laude*, Psychology, Auburn University (2013)

**Bar Admissions**  
Texas (2016)

- Representation of facility operator in private offering of membership interests in assisted living facility operating entity and real estate investment entity.
- Representation of a variety of clients in creation, implementation and evaluation of compliance programs and policies.
- Representation of individual physicians and practices in matters involving recruitment, non-competition, termination of employment and patient notifications.
- Representation of several nonprofit health organizations in formation and certification of entity by Texas Medical Board.

#### Press Releases

- “Gray Reed Welcomes Associate to Healthcare Practice” (April 9, 2018)

#### Thought Leadership

- “CMS Issues Blanket Waivers of the Stark Law in Response to the COVID-19 Pandemic”, Gray Reed Legal Alert (April 2, 2020)
- “Texas’ Prohibition on Balance Billing: What Now?”, Gray Reed Legal Alert (January 9, 2020)
- “Rural Health: Quality & Telehealth”, *AHHA’s Post-Acute and Long Term Services Practice Group Briefing* (May 2, 2019)
- “Proposed Revisions to the Anti-Kickback Regulatory Discount Safe Harbor: What Does this Mean for the Drug Industry and for Your Drug Prices in 2020?”, Gray Reed Legal Alert (February 7, 2019)

#### Organizational Involvement

- Dallas Bar Association

- Texas Health Lawyers Association