



Christina Randolph

Partner

St. Louis
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PRACTICES

- Health Care

EDUCATION

- Saint Louis University School of Law, J.D., magna cum laude, 2000
- Washington University in St. Louis, M.S.W., 1994
- University of Rochester, B.A., 1992

ADMISSIONS

- Illinois
- Missouri

AFFILIATIONS

- American Health Lawyers Association
- Missouri Society of Health Care Attorneys, Past President
- Illinois Association of Healthcare Attorneys
- St. Louis Area Health Lawyers Association
- Healthcare Businesswomen's Association
- Health Care Compliance Association
- The Missouri Bar

EMPLOYMENT

- Thompson Coburn LLP Partner, 2014-Present
- Greensfelder, Hemker & Gale, P.C. Officer, 2009-2014
Associate, 2000-2008

Clients look to Christina for practical solutions to their complex regulatory compliance problems. She provides in-depth legal and business advice to a wide variety of health care clients, including integrated health care delivery systems, hospitals, physicians and physician practices, ambulatory surgical centers and imaging providers.

Christina works closely with clients and their in-house counsel on day-to-day operational issues in order to minimize risk and achieve their business goals. Christina has extensive experience counseling clients on a variety of regulatory compliance issues faced by health care entities, with an emphasis on:

- Stark law
- Medicare/Medicaid reimbursement
- RAC and ZPIC Audits
- Coding and billing practice self-audits
- Responding to government investigations
- Initiating self-disclosures to CMS and OIG
- Compliance plan operations

Christina also regularly advises clients on matters related to physician-hospital alignment strategies including acquisitions, contractual and equity joint ventures, employment arrangements and hospital-based contracting arrangements. She collaborates with both in-house counsel and outside consultants to develop Stark-compliant compensation plans and revenue-sharing pools between hospitals and physicians.

Since 2009, Christina has served as an adjunct professor for the Center for Health Law Studies at Saint Louis University School of Law, which has been ranked as one of the top health law programs in the nation for nearly a decade.

Before joining private practice, Christina was a licensed clinical social

COMMUNITY

- Mercy Professional Services, Board of Directors, 2015 - Present
- National Alliance on Mental Illness (NAMI), St. Louis Chapter, Board of Directors, 2005-2009

worker providing counseling services to children, families and adults. She provided services in social service settings, including a community-based residential treatment center and a hospital emergency department.

Recognitions

- Listed in The Best Lawyers in America®, 2013-2021 (by BL Rankings)
- Listed in Missouri & Kansas Super Lawyers, 2013-2015 (by Thomson Reuters)
- Named an Up & Coming Lawyer by Missouri Lawyers Weekly, 2008

Presentations

- "Navigating Care Improvement: Bundled Payments and Physician Compensation Incentives"; Healthcare Financial Management Assn., February 12, 2015
- "Advanced Stark Law - Enforcement of the Stark Law and Strategies to Protect Your Organization"; Missouri Hospital Association, April 2014
- "Disruptive Physicians: Navigating the Employment of Medical Staff Issues"; Missouri Hospital Association Center for Education, February 2014
- "Compliance and Auditing"; Healthcare Financial Management Association, Southern Illinois Chapter, February 2014
- "Stark Self-Disclosure (Do's & Don'ts)"; Healthcare Roundtable for General Counsel, September 2013
- "The Heat is On! Government Enforcement of the Stark Law and Strategies to Protect Your Organization"; Missouri Hospital Association, May 2013
- "Physician Contracting: The Importance of Compliance"; Healthcare Financial Management Association, Southern Illinois Chapter, February 2013
- "The Stark Law Self-Referral Disclosure Protocol"; Missouri Hospital Association Annual Convention, December 2012
- "Physician Contract Arrangements – Know What to Watch For"; National Catholic Health Audit Network, August 2012
- "Hospital-Physician Arrangements: Can Your Organization Afford the Risk of Non-Compliance?"; Healthcare Financial Management Association, Southern Illinois Chapter, March 2012
- "Hospital-Physician Relationships: Is There Really no Such Thing as a Free Lunch"; Healthcare Financial Management Association, Southern Illinois Chapter, March 2011