NELSON HARDIMAN



Christine Parkins Johnson Attorney

> T: **310.203.2800** F: **310.203.2727**

cjohnson@nelsonhardiman.com

Admissions

State Bar of California

Affiliations

American Health Lawyers Association American Society for Pharmacy Law

Education

University of Southern California, Gould School of Law, J.D., 2012 Harvard T.H. Chan School of Public Health, MSPH, 2007 Duke University, B.A., 2001

PROFILE

A member of the firm's Regulatory Compliance and Transactions practices, Christine Johnson delivers complex regulatory and transactional counseling to healthcare organizations and health-related facilities. Christine combines a deep understanding of the challenges facing healthcare providers with her ability to navigate healthcare regulations and regulatory agencies to achieve solutions for her clients.

Well-grounded in Healthcare Law

Throughout her career, Christine has concentrated her practice on the regulatory and operational concerns of healthcare organizations and their subsidiaries, including health systems, hospitals, physician groups, ambulatory surgery centers, pharmacies, laboratories, skilled nursing and assisted living facilities, behavioral health, and substance abuse providers and other healthcare providers. Christine works closely with health organizations' in-house legal teams, advising about complex transactions and day-to-day concerns. Her experience encompasses health facility licensure and permits; Medicare and Medicaid enrollment; reimbursement and billing; survey/certification and accreditation; hospital governance and medical staff issues.

Transactional Acumen Bolstered by Regulatory Skills

Christine advises on mergers and acquisitions, joint ventures, affiliations and dispositions of healthcare entities. She has particular experience with hospital and multi-state pharmacy changes in ownership. Christine also has worked closely with private equity firms and real estate investment trusts (REITs) on health entity acquisitions and is particularly skilled at helping these companies understand and address regulatory challenges associated with contemplated acquisitions.

Before Nelson Hardiman

Christine joins Nelson Hardiman from the global firm of McDermott Will & Emery, where she practiced healthcare law, a marquee practice of the firm. Prior to law school, she worked on a federally funded program to improve care for HIV-positive patients. Further expanding her healthcare experience, Christine interned at the Centers for Medicare & Medicaid Services while obtaining her Master of Science in public health degree from Harvard. The project assessed the effect of reimbursement on hospitals' adherence to the Emergency Medical Treatment and Active Labor Act (EMTALA). Before public health school, Christine was the editor of a news magazine for hospital executives that focused on nurse executives and hospital-based patient care initiatives.

Industry Recognition

Christine was <u>named</u> to the Southern California Rising Stars list by Super Lawyers Magazine in both 2018 and 2019. She was also recognized as one of the <u>Top Women</u> <u>Attorneys of 2019</u>.

Life Outside the Firm

In her free time, Christine explores the Los Angeles area with her husband and two young children. They are accompanied by the family dog, whose zest for life and resistance to training makes her an entertaining addition to any adventure.

EXPERIENCE

Representative Experience

NELSON HARDIMAN

- Acquisition Part of team that represented a private equity firm in its 2017 acquisition of a pharmacy benefit manager.
- Acquisition Part of a team that represented a national for-profit health system in its 2015 purchase of a public university's health system, including two hospital facilities and an affiliated medical group.
- Acquisition/Licensure Obtained licensure for a 209-bed hospital as part of an acquisition by a for-profit health system in 2014.
- **Compliance** Part of a team that assisted a not-for-profit health system to assess its revenue cycle operations and identify areas of improvement in 2016 and 2017.
- Health Care Operations In 2017 and 2018, provide counseling to a public company in connection with its employee wellness center, including analyzing use of ancillary care providers and corporate practice of medicine issues.
- Health Care Operations In 2016 and 2017, provide counseling to a large medical group regarding the scope of practice of advanced practice and ancillary providers.
- Licensure In 2017 convinced Department of Health Care Services to consider a unique interpretation of one of its exemptions to a moratorium on Medi-Cal enrollment for Los Angeles pharmacies. Assisted the pharmacy at issue with a successful Medi-Cal enrollment application in 2018.
- Licensure Worked closely with California and federal regulatory agencies to obtain new licenses—including fifteen pharmacy permits—and maintain Medicare and Medi-Cal enrollment when an academic medical center created a health system in 2017.
- **Pharmacy Permits/Regulatory Compliance/Licensure** Obtained California Board of Pharmacy permits for four pharmacies as part of an acquisition of a national provider of specialty pharmacy, pharmacy management, pharmacy benefits management, and third-party administrator services in 2014; provided regulatory counsel regarding pharmacy permits for pharmacies in 30 states as part of the transaction.
- **Regulatory Compliance** Part of a team that provided regulatory counsel to a real estate investment trust in connection with its \$630 million acquisition of a portfolio of senior housing communities in nine states in 2015.
- **Regulatory Compliance/Licensure** Obtained licensure, Medicare and Medi-Cal enrollment and a California pharmacy permit for a 145-bed hospital as part of a change in ownership in 2013; advised the hospital regarding regulatory matters related to licensure and the addition of hospital services and clinics
- Hospital Bankruptcy & Sale Lead regulatory counsel to a large health system in its Chapter 11 bankruptcy case, the largest hospital bankruptcy in U.S. history. The matter has involved corporate and regulatory support for the system's day-to-day operations as well as extensive regulatory work on the sale of the system's six hospitals, including counsel regarding California attorney general conditions and approval process.
- **Hospital Sale** Nelson Hardiman served as lead regulatory counsel for the \$235 million sale of two Verity Health System hospitals O'Connor Hospital and Saint Louise Regional Hospital to Santa Clara County.
- Hospice Sale Represented the seller in the sale of two hospices.
- **Regulatory Compliance** Revised and drafted new policies for an addiction treatment facility for compliance with new California statutes and Department of Health Care Services requirements.
- **Regulatory Compliance** Assisted an ambulatory surgery center with drafting a plan of correction and passing a revisit survey by the State Agency for purposes of Medicare certification.
- **Regulatory Compliance** Assisted academic medical center with analysis of billing and reimbursement rules for specialized service.