



## Joseph Keillor\*

Of Counsel

The Connective (Virtual Office) | 410.862.1107 | [jkeillor@bakerdonelson.com](mailto:jkeillor@bakerdonelson.com)  
Baltimore | 410.685.1120

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Joseph Keillor represents health care clients in a broad range of transactional and regulatory matters.

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Joseph Keillor is a health care attorney with deep experience serving as a trusted advisor to clients regarding their thorniest and most complex health care regulatory matters. He regularly leads external compliance investigations, handles self-disclosures under the Self-Referral Disclosure Protocol (SRDP), and advises clients regarding the structuring or restructuring of contractual arrangements to minimize regulatory risks, especially with respect to the Physician Self-Referral Law and the Anti-Kickback Statute.

Joseph regularly helps clients design and implement alignment strategies, including through developing accountable care organizations (ACOs), along with a variety of other mechanisms. He also regularly advises clients regarding implications of changing payment models to their organizations and strategies for adapting to such changing models while managing regulatory risks. Joseph also has extensive experience in all phases of affiliations and mergers and acquisitions, including public, non-profit, and for-profit clients.

Joseph also provided dedicated leadership to The Health Project, Inc., a non-profit organization championing employer health promotion programs, where he served in a variety of capacities for over a decade.

Prior to attending law school, Joseph was an officer in the U.S. Air Force. In 2005, he served a tour of duty in Afghanistan. Joseph also served in the U.S. Air Force Reserve through 2011.

### Representative Matters

- Worked on all phases of the acquisition of a large teaching hospital by another component of the academic medical center.
- Handled 27 self-disclosures under the SRDP and countless additional regulatory assessments.
- Formed 13 Medicare Shared Savings Program Accountable Care Organizations and advised in the creation of related waiver initiatives.
- Worked on primary transaction documents in connection with the sale of a psychiatric hospital.
- Worked on all phases of the divestment (by long-term lease) of a large municipal health system; subsequently, handled numerous follow-on matters such as a pediatric hospital and specialty orthopedic hospital arising out of the long-term lease.
- Drafted primary transaction documents and led diligence in connection with the acquisition through joint venture of a community hospital from a hospital district; subsequently, handled the follow-on acquisition of the hospital district's share in such joint venture.
- Worked on all phases of the private equity investment into a management company related to a 500-member multispecialty physician group.
- Worked on a leading health system's joint venture for the operation of an overseas, 700+ bed destination medical center.
- Worked on transition agreements in connection with the unwind of the multi-decade operating lease of a hospital.
- Worked on all phases of the sale of a region's largest cardiology practice.

- Led a large team of diligence reviewers in connection with the combination of two nationally renowned health systems with combined revenue exceeding \$10 billion.
- Worked on the acquisition of a majority ownership interest in a multispecialty ambulatory surgery center (ASC) by a leading regional health system.
- Drafted primary transaction documents and led diligence in connection with the acquisition of an ophthalmology practice, related ASC and optical shops.
- Led due diligence and assisted with other phases of the acquisition of a 200+ multispecialty physician practice by a leading health system.
- Drafted dozens of ancillary instruments and oversaw filings of 300+ licenses/permits in connection with the spin-out of a teaching hospital and faculty practice plan from its related university.
- Led due diligence and supported all phases of the acquisition of a two-hospital system by a leading regional health system.
- Represented the seller parties in connection with the private equity investment into a dermatology practice, related ASC and related ancillary businesses.
- Represented the buyer in connection with the private equity investment into a specialty laboratory being spun out from affiliated rehabilitation centers.
- Drafted all physician agreements (including professional services agreements, employment agreements, clinical leadership agreements, waiver initiative program agreements, etc.) for a health system pursuing a revised physician alignment strategy.
- Represented a Texas-based physician cardiology group in an arrangement with a private equity-backed management company involving a \$37 million clinical asset sale with rollover equity grant, which included navigating health care regulatory challenges.



## Professional Honors & Activities

- Member – American Health Law Association
- Member – American Bar Association, Health Law Section
- Member – St. Louis Area Health Lawyers' Association
- Member – American Association of Provider Compensation Professionals
- Baylor Ambassador – Baylor University
- Assistant Scoutmaster – Scouting America
- The Health Project, Inc. (2011 – 2021)



## Publications

- "Relocation of Physician-Owned Hospitals: CMS Advisory Insights" (April 2025)
- "CMS Proposes Significant Changes to the Medicare Shared Savings Program and 60-Day Rule," *Payment Matters* (August 2024)
- "CMS Proposes Extending COVID-Era Telehealth and Supervision Flexibilities through CY 2025" (July 2024)
- "Organizational Charts — Practically Guiding Outside Counsel with Ever-Evolving Staff," *AHLA Connections* (May/June 2024)
- "Massive Stark Law Settlement Underscores Continued Government Scrutiny of Health System Physician Employment Arrangements," *HealthCareBusiness News* (April 2024)
- "Recent \$345 Million Settlement Underscores Critical Importance of Appropriate Physician Compensation" (January 2024)
- "COVID-19 Public Health Emergency Set to End May 11, 2023, Along with Many Waivers and Flexibilities," *Payment Matters* (May 2023)
- "CMS Approves New Group Information Form under Self-Referral Disclosure Protocol," republished March 7, 2023, in *Physicians Practice* (March 2023)
- "CMS Guidance on Rural Emergency Hospitals," *Payment Matters* (February 2023)

- "Medicaid Enrollment Redeterminations Looming," *Payment Matters* (February 2023)
- "Biden Administration Announces Planned End of Emergency Declarations" (February 2023)
- "Public Health Emergency Declaration Again Extended; Key Flexibilities Decoupled" (January 2023)
- "OIG Issues Favorable Advisory Opinion for Hospital's Provision of Nurse Practitioner Services" (January 2023)
- "CMS Revises Medicare Shared Savings Program's Performance Benchmarking Methodology to Encourage Continued Participation by Current Accountable Care Organizations," *Payment Matters* (November 2022)
- "Proposed Updates to the Medicare Shared Savings Program's Performance Benchmarking Methodology" (August 2022)
- "CMS Requests Comments on Proposed Changes to Stark Law Self-Referral Disclosure Protocol Forms" (July 2022)
- "Public Health Emergency Declaration Extended Through Mid-October" (July 2022)
- "Public Health Emergency Set for Extension: Lack of Notice Implies Renewal through Mid-October" (May 2022)
- "Bracing for Impact: Most Recent Public Health Emergency Declaration Extension Establishes New Dates to Monitor" (April 2022)
- "Navigating Your Organization Through the Termination of COVID-19 Emergency Declarations" (March 2022)
- Co-author – "The Transformative Possibilities of the Value-Based Fraud & Abuse Reforms," *American Health Law Association (AHLA)* (January 2021)



## Speaking Engagements

- "Community Health Network Stark Settlement Postmortem: Forensic Dissection of What Went Wrong, and Implications for Physician Arrangements," St. Louis Area Health Lawyers Association (October 2024)
- "Stark Law Nuggets: Hidden Gems and Landmines Buried Beneath the Surface," Saint Louis Area Health Lawyers' Association (November 2023)
- "Stark Law Nuggets: Hidden Gems and Landmines Buried Beneath the Surface," Nashville Council of Health Care Attorneys (June 2023)
- "The End of the Covid-19 Public Health Emergency," St. Louis Area Health Lawyers Association (SLAHLA) Meeting (September 2022)
- "The Future of Accountable Care," SLAHLA (April 2021)
- "Stark Law Developments: Scope of Liberalizations and their Implications," Health Ethics Trust Best Compliance Practices Forum (October 2017)



## Webinars

- Keeping Your Group Good To Go: Practical Guidance for Ensuring Stark Law Practice Compliance (September 2023)
- Navigating Through the Termination of COVID-19 Public Health Emergency (PHE) and Other Emergency Declarations (August 2022)



## Education

- University of Chicago, LL.M., 2011
- Washington University School of Law, J.D., 2010, magna cum laude
  - Order of the Coif
  - *Washington University Law Review*
- Baylor University, B.A., 2003, magna cum laude



## Admissions

- Maryland, pending
- Missouri, 2010
- Illinois, 2011

\* Baker Donelson professional admitted to the practice of law in Illinois and Missouri; Maryland bar application pending.