

**Neil M. Sullivan**  
OF COUNSEL

75 Livingston Avenue  
Roseland, New Jersey 07068  
T: 973.577.1804  
F: 973.577.1805  
nsullivan@greenbaumlaw.com



*People sometimes think of the law as an endless list of proscriptions inhibiting the accomplishment of goals, but I see it as a series of guardrails that can facilitate getting you where you want to go. When writing poetry, you must understand that a sonnet is constructed of three quatrains and a couplet written in iambic pentameter, and the practice of law lends itself to a similar approach. Once you understand the structure and make that part of your creative process, you can make magic.*

Mr. Sullivan concentrates his practice in healthcare and insurance law, with a particular emphasis on the intersection of healthcare finance and delivery. He regularly represents and counsels health plans and healthcare providers in regulatory compliance and filings, and alternative financial models for healthcare delivery, including Organized Delivery Systems (ODS), Accountable Care Organizations (ACO), Multiple Employer Welfare Arrangements (MEWA), and health system equity ownership or participation in insurance organizations.

As Assistant Commissioner of the New Jersey Department of Banking and Insurance (DOBI) from 2010-2014, Mr. Sullivan oversaw the Office of Life and Health during a period of fundamental change in both the healthcare and insurance sectors. This encompassed the implementation of the Affordable Care Act (ACA) and the Dodd-Frank Wall Street Reform and Consumer Protection Act; the emergence of alternative financial models for health care delivery, including CO-OPs, ACOs, and health system equity ownership or participation in insurance organizations; and the transition to electronic health records and implementation of the

### Departments

Corporate  
Healthcare

### Education

Rutgers University School of Law – Newark, J.D., 1993  
Rutgers Graduate School of Management, MBA, 1986  
Rutgers University, Newark College of Art and Sciences, B.A., 1980

### Bar Admissions

New Jersey, 1993

ICD-10 mandate.

In his role at DOBI, Mr. Sullivan had overall responsibility for the implementation of insurance reforms under the ACA, including the establishment of a high-risk pool and feasibility study of health insurance exchanges, and rationalizing conflicting points of state and federal law. He served as the DOBI Commissioner's designee on the NJ Individual Health Coverage (IHC) and Small Employer Health (SEH) program boards, the Mandated Health Benefits Advisory Commission, and the NAIC Regulatory Framework Task Force and Senior Issues Committee, and acted as liaison with the Centers for Medicare & Medicaid Services (CMS) over ACA implementation.

*Results may vary depending on your particular facts and legal circumstances.*

## HONORS & AWARDS

- Listed in *The Best Lawyers in America*® (a trademark of Woodward/White, Inc.) in the Health Care Law practice area (2024)
- Mr. Sullivan ranked among the top 15 professionals in the *NJBIZ* annual "Power 50 in Healthcare" list in 2012 - 2014

*Please visit our Award Methodology page for a description of the standard or methodology on which these accolades are based. Attorney Advertising: No aspect of this advertisement has been approved by the Supreme Court of New Jersey.*

## UNIQUELY NJ

- New Jersey State Bar Association; Insurance Benefits Committee (Chair, 2017)
- New Jersey Life & Health Insurance Guaranty Association (Board of Directors, 2004 - 2010)
- New Jersey Department of Banking and Insurance; Individual and Small Employer Health Coverage Program Boards (2010 - 2014); Legal Committee (former member)

## MORE ACTIVITIES & EXPERIENCE

- Mr. Sullivan's prior experience includes serving as in-house counsel at New Jersey's largest health insurer, as General Counsel for a community hospital, and as Director of Group Contracts for New Jersey's largest life insurer.
- As Assistant General Counsel at Horizon Blue Cross Blue Shield of New Jersey, Mr. Sullivan represented the company before state and federal regulators for new product development, changes and proposed changes to regulations, and market conduct matters.

## PRESENTATIONS & SPEAKING ENGAGEMENTS

Faculty, Managed Care Contracts: Medicare and Medicaid Considerations for Providers

Sponsor: *Strafford*, May 18, 2023

Presenter, What ALL Business Owners Who Received Pandemic Relief Funds Need to Know about the Government's Crackdown on PPP Loan Fraud

Sponsor: *New Jersey Business & Industry Association*, June 29, 2022

Presenter, Managed Care Contracts: Medicare and Medicaid Considerations for Providers

Sponsor: *Strafford*, March 2, 2022

Speaker, Integrating Health Care Financing and Delivery: New Paradigms for the 21st Century

Sponsor: *Greenbaum, Rowe, Smith & Davis LLP*, November 20, 2020

Speaker, Insurance Coverage Issues and Defending Your Rights in the Age of COVID-19

Sponsor: *Greenbaum, Rowe, Smith & Davis LLP, NJ Hospital Association, NJ Healthcare Financial Management Association, Medical Society of NJ, and NJ Dental Association*, July 1, 2020

Speaker, The Health Financing and Delivery System From the Flintstones to the Jetsons

Sponsor: *Healthcare Financial Management Association, NJ Chapter*, September 10, 2015

Speaker, ACA Implementation

Sponsor: *National Conference of State Legislatures*, August 8, 2011

Speaker, Navigating Health Care Reform

Sponsor: *American Law Institute*, February 23, 2010

## PUBLICATIONS & ALERTS

Author, Tips for Addressing Dispute Resolution in Payer-Provider Contracts

*Greenbaum, Rowe, Smith & Davis LLP Healthcare Perspectives Blog*, February 8, 2023

Author, Managed Care Contracting: A Survey of Current Market Conditions and Factors

*Greenbaum, Rowe, Smith & Davis LLP Healthcare Perspectives Blog*, December 14, 2022

Author, Providers May Soon Be Unable to Report Unpaid Medical Debt to Collection or Credit Reporting Facilities

*Greenbaum, Rowe, Smith & Davis LLP Healthcare Perspectives Blog*, August 18, 2022

Author, New Jersey Revises Its Law Regarding Surprise Billing Arbitration

*Greenbaum, Rowe, Smith & Davis LLP Healthcare Perspectives Blog*, August 12, 2022

Co-Author, Three Issues to Consider When Assessing the Impact of the U.S. Supreme Court's Decision in *Dobbs v. Jackson Women's Health Organization*

*Greenbaum, Rowe, Smith & Davis LLP Healthcare Perspectives Blog*, July 14, 2022

Author, Select The No Surprises Act and the Knotty Problem of Surprise Medical Bills

*Greenbaum, Rowe, Smith & Davis LLP Healthcare Perspectives Blog*, July 8, 2022

Author, Texas Court Sides with Challengers to Independent Dispute Resolution Process Under No Surprises Act

*Greenbaum, Rowe, Smith & Davis LLP Client Alert*, March 29, 2022

Co-Author, Federal "No Surprises Act" Brings National Oversight of Unexpected Billing for Healthcare Services

*Garden State Focus*, Spring 2021

Co-Author, Federal "No Surprises Act" Brings National Oversight of Unexpected Billing for Healthcare Services

*Greenbaum, Rowe, Smith & Davis LLP Client Alert*, March 2, 2021

Author, COVID-19 and Medicare Alternate Payment Programs

*Greenbaum, Rowe, Smith & Davis LLP Client Alert*, July 7, 2020

Author, Governor Murphy Announces Recommendations of Report of New Jersey's Long-Term Care Industry

*Greenbaum, Rowe, Smith & Davis LLP Client Alert*, June 11, 2020

Co-Author, Title III of the CARES Act: Supporting America's Health Care System in the Fight Against the Coronavirus

*Greenbaum, Rowe, Smith & Davis LLP Client Alert*, March 31, 2020

Author, Tiered Benefit Plans: in the Crosshairs

*NJHFMA's Garden State Focus Magazine*, Summer 2016, Vol. 62, No. 4

Author, Accountable Care Organizations - The Jersey Generations

*NJHFMA's Garden State Focus*, Summer 2015, Vol. 61, No. 5

## NEWS

2025 Edition of *Best Lawyers* Recognizes 56 Attorneys in 39 Practice Areas: Ten Greenbaum Lawyers Recognized on "Ones to Watch" List; Three Selected for "Lawyer of the Year" Recognition  
August 15, 2024

2024 Edition of *Best Lawyers* Recognizes 59 Attorneys in 38 Practice Areas: Twelve Greenbaum Lawyers Recognized on "Ones to Watch" List; Five Selected for "Lawyer of the Year" Recognition  
August 17, 2023