

Bridget Steele

She | Her | Hers

Partner

Rochester

P: 585.295.4429

bsteele@barclaydamon.com

Education

- University at Buffalo School of Law, *Summa Cum Laude* , JD
- St. Bonaventure University, *Summa Cum Laude*, BS

Practices & Industries

- Health & Human Services Providers
- Health Care Controversies
- Data Security & Technology
- Health Care
- Pharmacy

Admitted to Practice

- New York

Biography

Bridget concentrates her practice on assisting health care and human services providers with regulatory and compliance matters, including audits and investigations, self-disclosures, Medicaid and Medicare reimbursement issues, not-for-profit corporate governance, contract analysis and negotiation, and transactional matters.

Bridget has extensive experience working with behavioral health providers, home care agencies, health information exchanges (HIEs), hospitals, agencies that serve individuals with developmental disabilities, and provider networks, including independent practice associations.

Bridget also regularly assists clients with information privacy and security issues, including responding to and reporting data breaches and cybersecurity incidents, negotiating privacy and security terms in health care IT contracts, and providing advice regarding cyber risk liabilities and compliance with data privacy laws, such as HIPAA.

Bridget serves as co-chair of the firm's Women's Forum, which was established to create an environment that fosters meaningful interaction and mentoring opportunities for women attorneys to help them develop successful strategies regarding leadership, client, and professional development; marketing; and work-life balance.

Bar Associations

- New York State Bar Association, Health Law Section

Selected Memberships & Affiliations

- Barclay Damon's Women's Forum
- American Health Lawyers Association (AHLA)

Representative Experience

- Regularly reviews and drafts breach notification and privacy and security policies, notices and letters to individuals affected by data breaches, and reports to HHS and AGs to notify regulators of breaches.
- Regularly assists health care providers with performing and documenting HIPAA breach risk assessments to determine whether a security incident is a reportable breach.
- Represented several health information exchanges in negotiating health care IT vendor contracts and other data-sharing agreements, including terms relating to data protection obligations and cybersecurity risks.
- Represented care-coordination organizations (CCOs) to assist with HIPAA and corporate compliance, reviewing data-sharing agreements, and negotiating health care IT vendor contracts.
- Assisted several behavioral health care collaboratives (BHCCs) with forming IPA and developing network agreements as well as other governance and regulatory matters.
- Represented an institutional provider participating in clinical trials. Reviewed clinical trial agreements, including clinical research agreements and informed-consent forms.
- Assisted in preparing a response to an information request from the Office for Civil Rights related to a breach of protected health information.
- Represented health care providers in compliance-related investigations and submissions of self-disclosures to the OMIG.
- Represented NY not-for-profit corporations in complying with the NY Non-Profit Revitalization Act and subsequent amendments.
- Served as counsel to a NY Regional Health Information Organization (RHIO) in its merger with another RHIO that doubled the scope of the client's service base.
- Successfully defeated a $1.6 million liability arising from an Office of the Medicaid Inspector General (OMIG) finding that an intellectual/developmental disability (I/DD) agency documentation was insufficient to support reimbursement it received for services provided.
- Assisted a NYS care coordination organization (CCO) with health care compliance matters during its initial formation and

once operational, including assisting with vendor contracting, reviewing data-use agreements and security attestations, corporate matters, HIPAA compliance and policies, and preparing a corporate compliance plan and related policies.

- Represents an administrative data exchange in organizational planning, governance, regulatory compliance, contract negotiations, and building and implementing business-sustainability strategies.
- Represented the client in relation to a data breach caused by a ransomware/malware attack. Coordinated with the forensic investigator and ransomware expert to respond and remediate the breach, and to attempt to negotiate the ransom payment. Coordinated providing notification to impacted individuals and state regulators in multiple jurisdictions. Addressed legal ramifications of the attack with the client's customers based on the contractual and legal requirements for data security.
- Represented a client in relation to a data breach caused by an unsecured website regulating in disclosure of private information, including social security numbers and health care details. Coordinated a forensic investigation of the incident. Addressed the legal notification requirements for individuals impacted as well as state and federal agencies. Responded to state and federal regulatory investigations of the incident, including the negotiation of fines and remediation requirements.

Prior Experience

- Barclay Damon LLP, Summer Associate
- NYS Attorney General, Environmental Protection Bureau, Law Clerk

Selected Community Activities

- American Association of University Women, Bath (NY) Branch, Member
- Buffalo Fenians Ladies Gaelic Football Club, Member

Selected Honors

- Selected to *Super Lawyers* Upstate New York Rising Stars: Health Care, 2024–2026
- *Best Lawyers: Ones to Watch in America*®: Health Care Law, 2025
- Erie County Bar Association Volunteer Lawyers Project, Say Yes Legal Clinic Award, 2018
- New York State Bar Association, Empire State Counsel Honoree, 2018

Selected Speaking Engagements

- Value Network, AI at Work Conference, "Healthcare AI: Legal Strategies for an Evolving Threat Landscape" and "An AI-Driven Breach Scenario"
- New York Medical Group Management Association, “The New Information Blocking Rule: What Providers Need to Know” Webinar

Selected Media

- *Buffalo Business First*, "Meet the New Partners at Buffalo’s Top 5 Law Firms"
- Healio, "What Providers Should Know About Changes to Substance Use Confidentiality Regulations"
- New York MGMA *New York Beat*, "HHS-OCR Cautions Health Care Providers to Confirm Their Websites and Apps Are HIPAA-Compliant"
- *Buffalo Business First,* "Meet Emerging Attorney Bridget Steele"
- Syracuse.com, "Coronavirus Way-of-Life: Doctors, Patients Turn to Telemedicine Like Never Before"; "Coronavirus Tips: How to See a Doctor Without Leaving Your House"

Selected Alerts & Blog Posts

- NYS Department of Health Publishes Adopted Cybersecurity Regulations for Hospitals
- NYS Department of Health Publishes Amended Proposed Cybersecurity Regulations for Hospitals
- Updated Bulletin on Tracking Technologies in the Health Care Industry
- CMS Approves NYS 1115 Waiver Amendment (New York Health Equity Reform)
- Recent NYS Attorney General Data Security Settlement Highlights Importance of Addressing Security Deficiencies and Managing Vendor Relationships

Selected Podcasts

- *Barclay Damon Live: Cyber Sip*—"Don't Fear Compliance! How Health Care Startups Can Go From Zero to One"
- *Barclay Damon Live: Cyber Sip*—"Cybersecurity in Health Care: Five Steps to Compliance, Featuring Bridget Steele"