STITES & HARBISON PLLC



Sarah Cronan Spurlock

Title: Member

Phone: 502-681-0461

Location: Louisville, KY

Email: sspurlock@stites.com

Download: vCard

Sarah Cronan Spurlock is a member of the firm's Health Care Service Group and is Co-Chair of the firm's Privacy & Data Security Group. Sarah regularly advises clients on a wide range of health care issues, including fraud and abuse laws, compliance guidance, physician self-referral, physician employment agreements, physician and hospital contracting, technology and general contracting, HIPAA privacy and security, and data breach prevention and response. Her practice includes regulatory and transactional matters and health care litigation. Sarah is a Certified Information Privacy Professional (CIPP/US) and serves as the firm's Chief Privacy Officer.

CAPABILITIES

Practice Areas

- Health Care
- Privacy & Data Security
- Data Center Service Group
- Behavioral Health Care

RECENT ASSIGNMENTS

- Successfully obtained summary judgment for a healthcare provider in Jefferson Circuit Court in a putative class action asserting claims for negligence, negligence per se, and invasion of privacy stemming from an alleged data breach disclosing patient information. Judgment was obtained prior to any class being certified.

BAR ADMISSIONS

- Kentucky

RECENT NEWS, ARTICLES & SPEAKING ENGAGEMENTS

- Artifical Intelligence: Ethical Issues for the Healthcare Attorney
  speaker, 2026 Kentucky Health Law Institute, UK Rosenberg College of Law, Lexington, Ky., Sept. 3, 2026
- Under Attack: Experts explain why ransomware is everyone's problem now and detail the best plan of defense
  by Dawn Marie Yankeelov, *The Lane Report*, pp. 34-38, May 2026 *,with Ian T. Ramsey*
- Attorney-Client Privilege in the Age of Artificial Intelligence
  speaker, 2026 Issues for Corporate House Counsel, Kentucky Bar Association Corporate House Counsel Section, Louisville, KY, March 26, 2026 *,with Joshua K. Chesser (Josh)*
- Kentucky Supreme Court Clarifies Privilege for Hospital Incident Reports and Root Cause Analyses
  ,with Ashley W. Ward Stites & Harbison Client Alert, January 13, 2026
- Medical Cannabis Seminar
  panel member, Kentucky Academy of Healthcare Attorneys Webinar, November 13, 2024 *,with Bailey M. Browning, K. Kelly White Bryant, Jennifer J. Cave, Jackson B. Hurst-Sanders and Robin E. McGuffin*
- Tips for Defending Against Data Breach Litigation in the US and Abroad
  co-speaker, International Association of Defense Counsel (IADC) 2024 Annual Meeting, July 6-11, 2024
- The Cost of Third-Party Data Breaches: How to Avoid a Financial Disaster
  co-speaker, The Knowledge Group Webinar, June 14, 2024 *,with Chadwick A. McTighe*
- AI in Health Care: Navigating Growth, Risks and Implementation
  Kentucky Hospital Association Annual Convention, May 20-22, 2024
- Framework debate shows as Kentucky nears comprehensive privacy law
  by Joseph Duball, International Association of Privacy Professionals (IAPP), *The Privacy Advisor*, March 12, 2024
- US Chamber Urges 6th Circ. To Ax FirstEnergy Class Cert.
  By Katryna Perera, Law360.com, February 20, 2024 *,with Bethany A. Breetz, Marjorie A. Farris, Chadwick A. McTighe and Michael D. Risley*
- Mitigating Hospital Cyber Risks - Ransomware’s Impact on Operations and Outcomes
  Cybersecurity Crisis Management: Strategies for Health Care Professionals, Kentucky Hospital Association, January 23, 2024
- Artificial Intelligence in Healthcare
  Stites & Harbison Client Event, November 2, 2023

- Cybersecurity: The Rising Cost of Cyber Threats
  by Shannon Clinton, *The Lane Report*, September 25, 2023
- Mitigating Hospital Cyber Risks - Ransomware's Impact on Operations and Outcomes
  Kentucky Hospital Association 94th Annual Convention, Lexington, KY, May 15-17, 2023
- Health Care Providers and Business Associates Beware: Use of Online Tracking Technology May Violate HIPAA
  Stites & Harbison Client Alert, April 27, 2023
- Kentucky Lawmakers Considering Comprehensive Data Privacy Legislation
  Stites & Harbison Client Alert, March 8, 2023
- Ransomware Threats: Prevention Tips and Response Strategies
  panelist, American Bar Association, Infrastructure and Regulated Industries Section Webinar, February 28, 2023
- Incident Preparedness: Developing a Program to Respond to Security Incidents
  Speaker, Data Security and Privacy Symposium, Atlanta, February 8, 2023
- Call to Action for Critical Infrastructure Businesses – New Federal Cyber Breach Reporting: Obligations and Ransomware Prevention Strategies
  Bench & Bar, Kentucky Bar Association, November/December 2022
- Patient Inducement Prohibitions: Anti-Kickback and Civil Monetary Penalty Considerations
  Kentucky Primary Care Association Annual Conference, October 11, 2022
- Under Attack: Ransomware Threats, Prevention Tips, and Response Strategy for Health Care Providers
  Revenue Cycle and Compliance Summit, First Healthcare Compliance, June 23, 2022
- U.S. Privacy And Data Security Developments – Where Do We Go From Here?
  Mondaq WEBINAR, January 6, 2022
- Help! They've Hijacked Our Network and They Want Money - Now What? Strategies for Managing the Cyber-Attack
  Moderator, IADC 2021 Annual Meeting, August 15-19, 2021
- "No Company is Safe" — White House Urges Private Sector to Act Now in Hardening Defenses Against Growing Ransomware Threats
  Stites & Harbison Client Alert, June 10, 2021
- U.S. Privacy and Data Security Developments – Where Do We Go From Here?
  Webinar, presented by Mondaq, June 3, 2021
- Data Privacy Day: Scanning Data Privacy Issues for 2021
  ,with Alexandra MacKay Stites & Harbison Client Alert, January 29, 2021
- Liberating Patient Data – Is Your Hospital Ready for the Information Blocking Rule?
  Webinar, Kentucky Hospital Association, January 26, 2021 *,with Jennifer Henry Jackson*
- Not Your Grandma's Quilt: Exploring the Current 'Patchwork' and Recent Trends in U.S. Data Privacy and Security Laws

Kentucky Bar Association Corporate House Counsel Webinar, November 18, 2020

- Joint Agency Cyber Alert Warns of Imminent and Credible Ransomware Threat Against U.S. Health Care and Public Health Sectors

  ,with Ian T. Ramsey and Dustyn B. Jones Stites & Harbison Client Alert, November 2, 2020

- Medical Liability Considerations for Physicians

  Kentucky Medical Association Virtual Town Hall, September 24, 2020

- Eliminating Kickbacks in Recovery Act

  Kentucky Health Law Institute, UK CLE, September 2, 2020

- The Future of Medicine for the Emerging Physician post COVID-19

  Kentucky Medical Association Virtual Annual Meeting, August 22, 2020

- Is Telehealth Here to Stay?

  Medical News, June 30, 2020 *,with Jennifer Henry Jackson*

- OSHA Revises COVID-19 Guidance

  ,with Shannon Antle Hamilton Stites & Harbison, PLLC, Client Alert, June 5, 2020

- Privacy 2020 – California's Seismic Shift

  Discussion of the California Consumer Privacy Act (CCPA), Southern Law Network, April 16, 2020 *,with Alisa Micu*

- OCR Eases HIPAA Burdens for Telehealth during COVID-19 National Emergency

  ,with Jennifer Henry Jackson Stites & Harbison Client Alert, March 18, 2020

- Information You Need on the COVID-19 Coronavirus

  Stites & Harbison, PLLC March 2020

- Shifting Sands of U.S. Privacy Laws

  International Association of Defense Counsel Webinar, December 11, 2019

- No-fault insurance in Kentucky

  ,with K. Kelly White Bryant Medical News, July 8, 2019

- Cybersecurity and Data Breach Response for Lawyers: Threats, Prevention Tips, and Mitigation Strategies for Lessening the Risks of a Cyberattack

  Kentucky Bar Association Annual Convention, June 12, 2019

- Groundhog Day? Supreme Court Strikes Down Class Arbitration Efforts…Again

  ,with Chadwick A. McTighe and Marjorie A. Farris Stites & Harbison Client Alert, April 30, 2019

- The Race to Privacy

  Stites & Harbsion Thirsty Thursday Speaker Series, April 25, 2019 *,with Alexandra MacKay*

- Cyber Security for Rural and Critical Access Hospitals: Tips for Improving Data Security and Mitigating the Impact of a Cyber Attack

  Alliant Management Services Management Meeting, April 10, 2019

- Introduction to Health Law

  Panel member, Health Enterprise Network Healthcare Fellows, University of Louisville Louis D. Brandies School of Law, March 19, 2019 *,with K. Kelly White Bryant*

- Taking Stock of Your 2019 Cybersecurity Resolutions
  ,with Jennifer Henry Jackson Stites & Harbison Client Alert, February 8, 2019
- Pings That Go Bump in the Night: A Discussion of Health Care, Cybersecurity Threats, Prevention Tips and Mitigation Tactics
  Moderator and Panelist, 2018 Kentucky Health Law Institute, Lexington, KY, September 14, 2018
- Telehealth reform: Coverage expansion, reimbursement criteria will improve access to care
  Medical News, June 25, 2018
- Residents in Business
  faculty panel, University of Louisville School of Medicine, May 15-17, 2018 *,with K. Kelly White Bryant*
- Employment Contracting Seminar
  Kentucky Medical Association, Louisville, Ky., January 27, 2018 *,with K. Kelly White Bryant and Dustyn B. Jones*
- Kentucky Supreme Court Declines to Recognize New Tort of "Negligent Credentialing"
  Medical News, November 8, 2017 *,with Bethany A. Breetz*
- Leadership in Action: Take the Lead in Solving the Opioid Epidemic
  2017 Kentucky Medical Association Annual Meeting, Louisville, KY, August 25, 2017
- Cyber Threats & Ransomware
  Kentucky Academy of Hospital Attorneys, Kentucky Hospital Association Annual Convention, May 29, 2017
- Digital Fortress
  Modern Steel Construction, May 2017 *,with Ian T. Ramsey*
- Residents in Business
  faculty panel, University of Louisville School of Medicine, May 15-16, 2017 *,with K. Kelly White Bryant*
- Cybersecurity for business: Improving data security and mitigating the impact of a cyber-attack
  Kentucky Society of CPAs Spring Business Conference, Louisville, KY, April 20, 2017
- Be Cyberwise: Protect & Position Your Business for Growth
  Ohio River Valley Women's Business Council, 2017 Catch the Wave Conference, April 18, 2017
- The Interplay Between Social Media and Healthcare Privacy
  American Bar Association Regional CLE, Brave New World: Emerging Cyber and Electronic Issues in Health Care Litigation, March 31, 2017
- Kentucky Health: Shadowing a Primary Care Physician
  Kentucky Health, PBS.com, March 26, 2017
- Improving Data Security and Mitigating the Impact of a Cyber-Attack
  Kentucky Medical Group Management Association Spring Conference, March 16, 2017
- Under Attack: Cyber Threats Against the Health Care Industry
  presentation, Kentucky Health Law Institute, September 15, 2016
- Passwords, Revisited
  The Goods, Kentucky Association of Manufacturers, September 2016

- Build a Better Machine

  ,*with Ian T. Ramsey* *The Goods*, Kentucky Association of Manufacturers, July 2016

- Residents in Business

  faculty panel, University of Louisville School of Medicine and Greater Louisville Medical Society, May 24-26, 2016 , *with K. Kelly White Bryant*

- Stop. Think. Connect.

  presentation, Stites & Harbison Summer Associate Program, May 16, 2016 ,*with Ian T. Ramsey*

- Law Firm Data Security: It's the End of the World As We Know It (And I Don't Feel Fine)

  presentation, Southern Law Network, Louisville, Kentucky, May 13, 2016 ,*with Ian T. Ramsey*

- Don't Bet on Longshots - Practical Advice on Data Security for Financial Institutions

  Stites & Harbison Creditors' Rights & Bankruptcy Service Group Day at the Races, Keeneland, April 14, 2016 ,*with Ian T. Ramsey*

- Identifying and Protecting Your Core Data

  The Goods (p.36), Kentucky Association of Manufacturers, March 2016 ,*with Ian T. Ramsey*

- OCR Launches Phase 2 HIPAA Audits via Email Destined for Your Spam Folder

  ,*with Dustyn B. Jones* Stites & Harbison Legal Update, March 24, 2016

- Data Breaching Now Its Own Industry

  by Robert Hadley, *The Lane Report*, December 8, 2015 ,*with Ian T. Ramsey*

- Data Breaches: Is Your Attitude about Data Security Putting You and Your Company at Risk?

  The Goods (p. 16), Kentucky Association of Manufacturers, November 2015 ,*with Ian T. Ramsey*

- Employee Attitudes Fuel Your Data Security Plan

  Legaltech News, October 29, 2015 ,*with Ian T. Ramsey*

- Are you ready for a HIPAA Audit?

  Kentucky Association of Health Care Facilities Webinar, October 21, 2015

- Technology Highlights for the Restructuring Professional: Privacy, Data Security & Electronic Discovery

  co-presenter, International Women's Insolvency & Restructuring Confederation (IWIRC) Day at Keeneland, October 9, 2015

- Data breaches: Is your attitude about data security putting you and your company at risk?

  Inside Counsel, September 24, 2015 ,*with Ian T. Ramsey*

- Privacy & Data Security – April 23, 2015

  ,*with Ian T. Ramsey* Keeneland, April 23, 2015

- Data Breaches: Is Your Attitude about Data Security Putting You and Your Company at Risk?

  ,*with Ian T. Ramsey* Stites & Harbison Client Alert, July 21, 2015

- Data breaches: Is your attitude about data security putting you and your company at risk?

  Medical News, July 6, 2015 ,*with Ian T. Ramsey*

- Prevention and Response: Is Your Business Prepared for a Data Security Breach?
  Stites & Harbison, PLLC Thirsty Thursday networking event, May 21, 2015 *,with Ian T. Ramsey*
- Are your employees putting your organization at risk for a cyber-attack?
  ,with Ian T. Ramsey Stites & Harbison Client Alert, April 3, 2015
- Is your attitude about data security putting you and your company at risk?
  Professional Insight, *Business First of Louisville*, March 27, 2015 *,with Ian T. Ramsey*
- Target Data Breach Opens Potential Recovery Path for Financial Institutions
  ,with Brian R. Pollock and Ian T. Ramsey Stites & Harbison Client Alert, March 4, 2015
- Hot Topics in the Area of Health Law Privacy
  Kentucky Health Law Institute, Novemer 7, 2013
- HIPAA Wants You
  Stites & Harbison Thirsty Thursday networking event, July 25, 2013
- Final Rule Amending HIPAA Regulations
  Stites & Harbison Client Alert, January 21, 2013
- Physician Employment Contracting Symposium
  co-presenter, Kentucky Medical Association, November 3, 2012 *,with K. Kelly White Bryant*
- Turning up the heat on HIPAA compliance: What to expect from increase enforcement and Office for Civil Rights audits
  co-author, Louisville Bar Association's *Bar Briefs*, November 2012
- HIPAA Update for Physician Office Managers
  Kentucky Pediatric Office Managers Association, October 11, 2012
- Stolen laptop leads to $1.5 million HIPAA settlement
  Stites & Harbison, PLLC, Client Alert, September 26, 2012
- HIPAA and HITECH's Impact on Certified Public Accountants
  Kentucky Society of CPAs Healthcare Conference, May 16, 2012
- Keeping up with technology demands: Delayed deadlines for Meaningful Use and ICD-10 reflect overburdened healthcare providers
  Medical News, April 2012
- HIPAA Audits and Investigations - What to expect when the Office for Civil Rights comes knocking
  Louisville Bar Association, Health Law Section, April 11, 2012
- Make Way for Medicaid Managed Care: What to expect as Kentucky departs from traditional fee-for-service reimbursement in favor of managed care for Medicaid recipients across the Commonwealth
  Louisville Bar Association's *Bar Briefs*, November 2011 *,with Elizabeth Ann Johnson (Betsy)*
- HITECH Challenges for Physicians: Keeping Up with Changes to Health Information Privacy and Security Rules in an Expanding Electronic Environment

Kentucky Medical Association, August 23, 2011

- HIPAA and Social Media Issues for Employers, Hot Topics and Critical Issues Pertinent to Employers and Health Care Providers

  Health Law and Labor & Employment Sections, Louisville Bar Association, June 2, 2011

- HITECH's Amendments to HIPAA: Recent Changes to Health Information Privacy and Security Rules and their Impact on State Regulatory Investigations

  National Board for Certification in Occupational Therapy, Annual Conference on Occupational Therapy State Regulation, October 23, 2010

- HIPAA Update for Employers

  Society of Human Resources Management Mid-West Kentucky Chapter, Madisonville, Ky., April 2010

- How will the HITECH Act affect your law firm?

  Louisville Bar Association, Health Law Section, April 28, 2010

- EMTALA

  The Regional Medical Center of Hopkins County, Madisonville, Ky., March 2010

- Current Trend: Employment of Physicians by Hospitals

  2010 Health Law and Compliance Update 1-2 (John Steiner ed., 2010)

- Grounding Cyberspeech: Public Schools' Authority to Discipline Students for Internet Activity

  97 *Kentucky Law Journal* 149 (2008)

FIRM LEADERSHIP

- Chief Privacy Officer
- Privacy & Data Security Practice Group, Co-Chair
- Office of General Counsel, as Chief Privacy Officer

MEMBERSHIPS

- American Bar Association,
  - Health Law Section
- Kentucky Bar Association
- Louisville Bar Association,
  - Health Law Section, Chair (2011)
- American Health Law Association

- International Association of Privacy Professionals
- International Association of Defense Counsel,
  - Chair of the Membership Committee (2025)
  - Cyber Security, Data Privacy and Technology Committee, Past Chair

COMMUNITY INVOLVEMENT

- Yew Dell Botanical Gardens, Board of Directors (2018-present)
- Louisville Legal Aid Society, Volunteer (2009-16)
- Sisters of Charity of Nazareth, Inc., Board of Directors (2011-16)
- Focus Louisville, February 2016 Class

EDUCATION

- University of Kentucky College of Law J.D., *magna cum laude* 2009
- Indiana University B.A., Sociology, 2000

MORE THAN STITES & HARBISON

Sarah joined Stites & Harbison in September of 2009 after participating in the firm's summer associate program in 2008. In the summer of 2007, she worked in the legal department at Brown-Forman Corporation in Louisville. Before law school, Sarah lived in New York City where she worked at Friedman, Wang & Bleiberg, P.C. as a paralegal, and Lehman Brothers, Inc. in human resources supporting the information technology division. Sarah is an accomplished equestrian and enjoys riding American Saddlebred horses in her free time.

ACCOLADES

- *Best Lawyers in America*®, Health Care Law (2019-27)
- *Business First of Louisville*, 20 People to Know in Law (2018)
- *Business First of Louisville*, Partners in Health Care People to Watch (2014)