

Press Coverage | March 25, 2026

New York Settlement, Federal Guidance Highlight Danger of ‘Ghost Networks’

Chris Carlson, a partner with Troutman Pepper Locke, was quoted in the March 25, 2026 *Corporate Counsel* article, “[New York Settlement, Federal Guidance Highlight Danger of ‘Ghost Networks’](#).”

“Compliance can be difficult,” said Troutman Pepper Locke partner Chris Carlson. “You have to keep your eye on the ball all the time.”

Carlson pointed to several steps that insurers can take to limit their risk.

“A common theme you see in all of these settlements is requiring verification cycles,” in which the insurer has to audit its network periodically—in Emblem’s case, 90 days, Carlson said.

“You’re never going to be 100% accurate,” Carlson added, partly because of high turnover in the mental health field. But regular audits are a way for an insurer to show that it is trying to comply with its obligation to maintain a real network, reducing its risk, he said.

Carlson also said that it is important for insurers to identify who within their organization is responsible for the state of the network.

“We have seen in the past that employee turnover or changing initiatives can result in these knowledge gaps,” he said.

Carlson also stressed that, while New York and California are “the tip of the spear” thanks to their large, well-resourced attorney general offices, ghost networks are not a partisan issue.

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It is, Carlson said, “an issue everyone seems to be able to get behind.”

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