



Via Overnight Mail and Email

June 27, 2025

Oregon Health Authority
Health Care Market Oversight Program
Attn: Sarah Bartelmann, Cost Programs Manager
Five Oaks Building
421 SW Oak Street, Suite 850
Portland, OR 97204

RE: Annual Report of Compliance for the conditions to the Affiliation Agreement (“Affiliation Agreement”) between Mid-Columbia Medical Center and Adventist Health System/West

Dear Ms. Bartelmann:

Pursuant to the Oregon Health Authority’s April 14, 2023, Findings of Fact, Conclusions of Law and Final Order (the “Order”), Adventist Health System/West, dba Adventist Health (“Adventist”) and Mid-Columbia Medical Center, dba Adventist Health Columbia Gorge (“AHCG”) submit this report to the Oregon Health Authority Health Care Market Oversight (“HCMO”) Program describing compliance with each condition set forth in the Order from January 1, 2024 until December 31, 2024 (“FY 2024”). Adventist and AHCG may be referred to collectively as the “Entities” in this report.

Condition 2(a)

Since the closing date of the Affiliation Agreement, the Entities have not modified the Affiliation Agreement.

Condition 2(b)

During FY 2024, except for (i) routine accounting and financial management purposes typical of a consolidated health system or (ii) where services or supplies provided by Adventist to AHCG for AHCG’s benefit on the same terms and conditions to other Adventist affiliates, Adventist has not received the benefit of distributions or funding from AHCG.

Condition 2(c)

During FY 2024, AHCG has continued to operate and maintain AHCG’s license as a general hospital pursuant to OAR 333-500-0032 and OAR 333-520-0000 through 120. AHCG has maintained the following services at or above service levels at the time of close:

- i. General medical, maternity, and surgical services;
- ii. An Emergency Department;
- iii. Dietary, laboratory, and radiology services;
- iv. An onsite pharmacy;
- v. A pharmacist on call 24/7 to staff the pharmacy;
- vi. On-site 24/7 staffing for its laboratory and radiology services.

Condition 2(d)

During FY 2024, AHCG has operated and maintained AHCG facilities, services, and programs at or above service levels at the time of close.¹ Without limiting the foregoing, this representation applies to the following, essential healthcare services:

- i. Obstetrics and gynecology;
- ii. Behavioral health/psychiatric services;
- iii. Family medicine/primary care services.

Condition 2(e)

During FY 2024, AHCG maintained service levels and referral policies for the following services:

- i. Reproductive health care services, including but not limited to induced abortion, birth control methods (including emergency contraception), sterilization, fertility services, and testing for pregnancy and sexually transmitted infections;
- ii. Gender-affirming care, including but not limited to counseling and hormone therapy; and
- iii. End of life services, including comfort care and lethal medication under Oregon's Death with Dignity Law

Condition 2(f)

During FY 2024, AHCG has maintained its participation in all public health insurance programs in which AHCG was a participant at closing.

Condition 2(g)

AHCG restored medical oncology services at Celilo Cancer Center effective May 6, 2024.

Condition 2(h)

During FY 2024, neither AHCG nor Adventist has significantly reduced, restricted, or terminated the facilities, services or programs contemplated by the conditions set forth in sections 2(c) through 2(g) of the Order.

Condition 2(i)

During FY 2024, there has been no emergency caused by the unplanned departure of providers that resulted in a significant temporary reduction, restriction, or termination of the facilities, services, or programs contemplated by section 2(c) through 2(g) of the Order.

Condition 2(j)

During FY 2024, Adventist continued to invest in AHCG (the remainder of) the \$100 million referenced in the Affiliation Agreement. These investments included almost \$5,287,883 for Urgent Capital Needs, as

¹ As previously acknowledged by the HCMO Program, AHCG closed its occupational health clinic on February 28, 2025. Separately, AHCG reopened The Celilo House, which provides temporary housing for non-local patients receiving care at Celilo Cancer Center, on April 24, 2025.

detailed in the Capital Investment Plan submitted to the HCMO Program on March 13, 2025,² as well as \$23,207,545 provided to offset AHCG's operating losses.

Condition 2(k)

On May 13, 2025, the Entities submitted a copy of the Capital Investment Plan (the "Plan") to OHA. The Plan has not been modified since its submission to OHA.

Condition 2(l)

On May 6, 2024, the Entities submitted a copy of the Urgent Capital Plan to OHA. The Urgent Capital Plan has not been modified since its submission to OHA.

Condition 2(m)

The Entities are submitting this annual compliance report to OHA in order to satisfy the requirements set forth in Section 2(m) of the Order. This submission is the second annual compliance report, with the first annual compliance report having been submitted to OHA on or about June 1, 2024.

² This sum is in addition to the \$2.1 million spent on Urgent Capital Needs in FY 2023.

Certification

We, the undersigned, hereby certify that we are the President and Chair of the Board of Directors, respectively, of Mid-Columbia Medical Center, dba Adventist Health Columbia Gorge, an Oregon public benefit nonprofit corporation; that this report is true, accurate and complete.

MID-COLUMBIA MEDICAL CENTER



Kyle King
President

Kerry Heinrich
Chair of the Board of Directors

Certification

We, the undersigned, hereby certify that we are the President and Chair of the Board of Directors, respectively, of Mid-Columbia Medical Center, dba Adventist Health Columbia Gorge, an Oregon public benefit nonprofit corporation; that this report is true, accurate and complete.

MID-COLUMBIA MEDICAL CENTER

Kyle King
President



Kerry Heinrich
Chair of the Board of Directors

Certification

We, the undersigned, hereby certify that we are the President and CEO and Chair of the Board of Directors, respectively, of Adventist Health System/West, dba Adventist Health, a California nonprofit religious corporation; that this report is true, accurate and complete.

ADVENTIST HEALTH SYSTEM/WEST



Kerry Heinrich
President and CEO

John Freedman
Chair of the Board of Directors

Certification

We, the undersigned, hereby certify that we are the President and CEO and Chair of the Board of Directors, respectively, of Adventist Health System/West, a California religious nonprofit corporation; that this report is true, accurate and complete.

ADVENTIST HEALTH SYSTEM/WEST

Kerry Heinrich
President and CEO



John Freedman
Chair of the Board of Directors

Certification

The undersigned, hereby certifies that he is the President and Chair of the Board of Directors of Stone Point Health, a California nonprofit public benefit corporation; that this report is true, accurate and complete.

STONE POINT HEALTH



Kerry Heinrich

President and Chair of the Board of Directors