



Timothy Hatfield  
Partner  
(503) 208-5037  
[tim@hkhealthlaw.com](mailto:tim@hkhealthlaw.com)

September 26, 2024

**VIA EMAIL**

Sarah Bartelmann, MPH  
Health Care Market Oversight Program Manager  
Oregon Health Authority

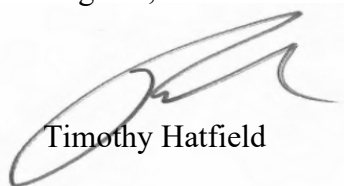
**Re: Information Request for 1-Year Follow-Up Review – 012 PeaceHealth-NWSS**

Sarah,

Below, please find responses to the 1-year follow-up information request regarding the transaction by and between Northwest Surgical Specialists and PeaceHealth.

Also enclosed with this filing is a confidentiality log, designating certain of the data as confidential and not subject to public release.

Regards,

A handwritten signature in black ink, appearing to read 'Timothy Hatfield', is written over a light gray rectangular background.

Enclosures

## INQUIRIES AND RESPONSES

- 1. Please complete the attached data request workbook. Further instructions are provided in the workbook.**

See attached workbook.

- 2. Provide the name, address, and closing date of all PeaceHealth surgical practice locations in Oregon that have closed since August 18, 2023.**

No PeaceHealth surgical practice locations in Oregon have closed since August 18, 2023.

- 3. Describe any changes in governance and management of PeaceHealth surgical practices in Oregon since the close of the transaction, on or after August 18, 2023.**

There have been no changes in governance or management of PeaceHealth surgical practices in Oregon since the close of the transaction on or after August 18, 2023.

- 4. How many Northwest Surgical Specialists, LLP (NWSS) staff (both clinical and non-clinical) were retained after the close of the transaction, or on or after August 18, 2023, and how many remain employed by PeaceHealth as of August 2024?**

Twenty-four NWSS staff (clinical and non-clinical) were retained after the close of the transaction on or after August 18, 2023. Twenty of them remain employed by PeaceHealth as of August 2024.

- 5. List all non-employee surgeons and/or surgical groups that utilized surgical facilities at PeaceHealth Sacred Heart Medical Center Riverbend (PeaceHealth-Riverbend) and RiverBend Ambulatory Surgery Center (ASC) between August 18, 2022, and August 18, 2023. In doing so, provide:**

- a. Name of non-employee surgeon and/or surgical group**
- b. Dates of affiliation**
- c. Location (PeaceHealth-Riverbend or RiverBend ASC, or both)**

See enclosed.

- 6. List all non-employee surgeons and/or surgical groups that have utilized surgical facilities at PeaceHealth-Riverbend and RiverBend ASC since August 18, 2023. In doing so, provide:**
- a. Name of non-employee surgeon and/or surgical group**
  - b. Dates of affiliation**
  - c. Location (PeaceHealth-Riverbend or RiverBend ASC, or both)**

See enclosed.

- 7. List all locations (including facility names and addresses) where PeaceHealth surgeons currently have admitting privileges or provide surgeries. Include PeaceHealth locations and any others.**

See data request workbook tab 2 "Locations."

- 8. Describe any quality improvement or peer review activities in which former NWSS surgeons have taken part since the close of the transaction.**

Peer review committee, National Surgical Quality Improvement Program, and a monthly comorbidity and mortality committee.

- 9. Describe how continuity of care of surgical patients of PeaceHealth surgical practices in Oregon has changed or continued since the close of the transaction.**

Continuity of care for surgical patients of PeaceHealth surgical practices in Oregon has improved via the transition to an enhanced electronic medical records system. This means that all patient care records are in one electronic health record system that is immediately available to any PeaceHealth service provider, as well as community partners for treatment purposes. Clinicians with quick access to a patient's health history can provide a more timely, accurate, and informed care plan.

- 10. Describe the interpretation and translation services currently available to patients of PeaceHealth surgical practices in Oregon.**

Interpretation services are provided in-person, via video and phone as well as translation of written documents. Please see attached list of all the resources available to patients of PeaceHealth surgical practices.

**11. How many patients had applied for financial assistance/charity care for surgical procedures rendered by PeaceHealth surgeons between August 18, 2023, and July 31, 2024?**

A total of 2,249 patients applied for financial assistance/charity care for surgical procedures rendered by PeaceHealth surgeons between August 18, 2023 and July 31, 2024.

**12. How many patients were granted financial assistance/charity care for surgical procedures rendered by PeaceHealth surgeons between August 18, 2023, and July 31, 2024?**

A total of 1,452 patients were granted financial assistance/charity care for surgical procedures rendered by PeaceHealth surgeons between August 18, 2023 and July 31, 2024.

**13. Since the close of the transaction, have former NWSS employees been subject to any restrictions on future employment opportunities (e.g., through noncompete agreements or other contractual arrangements) as a condition for their employment with PeaceHealth?**

No.

**14. Since the close of the transaction, have any former NWSS employees been subject to any restrictions on employment opportunities (e.g., through noncompete agreements or other contractual arrangements) as a condition for a bona fide advancement of employment with PeaceHealth?**

No.

**15. Describe any service or operational changes impacting the PeaceHealth surgical practices in Oregon since the close of the transaction. Specifically, describe any changes related to:**

**a. Number and composition of clinical staff**

All caregivers that were employed with NWSS at the time of transition, were extended an employment opportunity within PeaceHealth. Most of the

employees accepted roles in the department or within the local PeaceHealth region.

**b. Number and composition of administrative staff:**

Administrative services such as IT support, medical record management, and billing are managed within the Oregon Network and the System office. As such, PeaceHealth can support NWSS's prior operations with fewer administrative staff, and a small number of administrative positions have been eliminated.

**c. Staff compensation, employment terms, or associated policies:**

All NWSS employees were transitioned to PeaceHealth at either their prior rate of pay, or an increase in pay to ensure salaries were in alignment with existing PeaceHealth caregivers classified in the same roles. Our analysis pre-integration demonstrated that PeaceHealth salaries and benefits were richer than the benefits and compensation offered by NWSS. Please see related policies attached in response to question 17.

**d. Patient care practices:**

None.

**e. Patient admissions/enrollment practices:**

None.

**f. Financial assistance/charity care policies:**

The financial assistance policy has been amended to add a pre-screening process that establishes presumptive eligibility for assistance. See Section 6 (Oregon Hospital Pre-screening Process for Presumptive Eligibility).

**g. Hours of operation:**

None.

**h. Range of services offered:**

None.

**i. Forms of insurance accepted:**

None.

**j. Billing and payment practices/policies:**

None.

**k. Availability of translation/interpretation services:**

None.

**16. Provide copies of all policies governing NWSS in effect as of June-July 2023 (or immediately prior to the transaction's close) relating to:**

**a. Clinical staffing**

PeaceHealth is not aware of any such policies.

**b. Hiring and dismissal (including clinical, administrative, and management employees)**

PeaceHealth is not aware of any such policies.

**c. Employee compensation (including clinical, administrative, and management employees)**

See enclosed.

**d. Training and quality improvement**

See enclosed.

**e. Patient care**

We are not aware of any such policies.

**f. Patient enrollment**

See enclosed.

**g. Billing and payment**

See enclosed.

**h. Financial assistance/charity care**

Please see our July 14, 2023 supplemental response. NWSS did not have a patient-facing financial assistance policy. However, if a patient requested a discount, then NWSS would offer patients who pay their balance in full within 30 days a discount of 10% for insured patients and 25% for self-pay patients. For Bridge- approved patients without health insurance, NWSS would accept 50% of their Bridge assistance offer for balances above \$1,000.

**17. Provide copies of all policies governing PeaceHealth surgical practices in Oregon in effect as of August 2024 relating to the areas listed in 16.a through 16.h above.**

See enclosed, which contain responses for a - e, g and h. The parties have no documents responsive to f.

**18. Have PeaceHealth surgical practices in Oregon entered into any new supply agreements, changed any existing supply agreements, or terminated any supply agreements since close of the transaction?**

No.

**If so, please provide:**

- i. The supplier's name**
- ii. A description of the products or services covered by the agreement**
- iii. (For changes to an existing agreement), a summary of any changes**
- iv. Reason(s) for the new agreement, termination, or change**

N/A.