



VIA EMAIL

Alice Cuprill Comas
EVP of Institutional Affairs and General Counsel
Oregon Health and Science University

February 5, 2025

Re: Community Review Board outreach and engagement

The Oregon Health Authority (OHA) is the state agency charged with operating the Health Care Market Oversight (HCMO) Program under Oregon Revised Statutes (ORS) 415.500 through 415.900 and Oregon Administrative Rules (OAR) 409-070-0000 through 409-070-0085.

On February 4, 2025, OHA received a letter from Oregon Health & Science University (OHSU) asking about outreach to and engagement with members of the Community Review Board (CRB) who will be providing a recommendation to OHA about the proposed transaction involving OHSU and Legacy Health.

In response to all three inquiries, OHA points OHSU to the CRB Guide posted on the [transaction webpage](#) and shared with all CRB members. The document states that “members are ***expected to refrain*** from discussing the transaction and review with ***representatives of any of the parties*** involved in the transaction.” OHA issued a similar CRB guide, containing identical language, when convening a CRB for the [013 Kroger Albertsons](#) transaction. This is a long-standing policy of OHA.

Should any CRB members be contacted by or enter into a discussion with a representative of the transacting parties, or any other entity or individual representing the transacting parties or an interested party connected with the transacting parties, OHA will notify the public of such discussions and promptly remove the member from

the CRB. Should OHA have to remove multiple members from the CRB, OHA may be forced to terminate the current CRB and suspend the transaction indefinitely under ORS 415.501(10) in order to solicit and seat a new CRB.

In similar vein, OHA will not be providing OHSU with contact information for its CRB members.

Should you wish to discuss this in more detail, please contact our legal counsel Karine Gialella at Karine.Gialella@doj.oregon.gov.

For more information about the Health Care Market Oversight program, please consult the program website: <https://www.oregon.gov/HCMO>. If you have questions or need further information, please contact the Health Care Market Oversight team at hcmo.info@oha.oregon.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Sarah E. Bartelmann", with a long horizontal flourish extending to the right.

Sarah Bartelmann, MPH
Cost Programs Manager
Oregon Health Authority