

Redaction & Confidentiality Log – Submission dated January 23, 2026

Per OAR 409-070-0070 and other applicable law, this document identifies those documents that are exempt from public disclosure, and explains the grounds for such exemption. Under OAR 409-070-0070(3), “[c]onfidential materials filed by an applicant in connection with a [HCMO] transaction that is subject to review by . . . the [Oregon Health] Authority . . . must be maintained as confidential materials in accordance with . . . ORS 415.501(13)(c).” Under ORS 415.501(13)(c), the Oregon Health Authority “shall maintain the confidentiality of all confidential information and documents that are not publicly available that are obtained in relation to a [HCMO] material change transaction.” Such information is “exempt from disclosure under ORS 192.311 to 192.478 [the Public Records Act].” The documents and information identified below are confidential and contain information that is not publicly available. Therefore, the applicant respectfully ask that the Oregon Health Authority maintain the confidentiality of such documents and not release any such documents under the Oregon Public Records Act.

This document in no way limits either party’s right to assert additional or alternative grounds for exemption from the Oregon Public Records Act. The applicant respectfully requests highly confidential treatment under all applicable statutes, rules, and regulations. Without prejudice to the rights of Asante and its subsidiaries (“Asante”), or Southern Oregon Surgery Center, LLC (“SCSO”), if the Oregon Health Authority or Department of Justice should at any time contemplate disclosing any redacted, or otherwise confidential or privileged, materials to the public or to any third party for any reason and for any use—including but not limited to quoting from, attaching, or otherwise referring to such documents in a court or administrative proceeding whether filed under seal or publicly—we request an opportunity of no fewer than three days’ advance notice to allow sufficient time to object and, if necessary, seek protections against disclosure from a court of competent jurisdiction.

Reference	Party Information	Information Requested	Information Redacted	Basis for Redaction
Response Dated January 23, 2026 to Request for Information (RFI”) Letter, Attachment A, Page	SCSO	Information regarding billing practices	Certain competitively sensitive information regarding billing practices	SCSO requests confidential treatment of this information. This information has not been made publicly available in any other forum. Under ORS § 415.501(13)(c), the Oregon Health Authority is prohibited from disclosing confidential information and documents that are not publicly available that are obtained in relation to a material change transaction. This information is competitively sensitive, and disclosure could be used by others for business advantage. Therefore, this information is protected as a “trade secret” under ORS § 192.345(2) and further protection under ORS § 192.355(9)(a) and ORS § 646.461 et seq. As such, SCSO is requesting further confidential treatment of this information unless SCSO provides its written consent to publication.