

Buchanan

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VIA EMAIL (hcmo.info@oha.oregon.gov)

Oregon Health Authority
Health Care Market Oversight Program
800 NE Oregon Street, Suite 772
Portland, OR 97232
Attn: Sarah Bartelmann, MPH, Cost Programs Manager

Re: Additional Information in Support of Notice of Material Change Transaction

Dear Ms. Bartelmann:

This letter responds to two inquiries made by representatives of your office in a June 2, 2026, meeting regarding the Notice of Material Change Transaction submitted by Chapters Health System, Inc. ("Chapters") in connection with its proposed affiliation with Housecall Providers Services, LLC and Housecall Providers, PC, both of which are subsidiaries of CareOregon, Inc. ("CareOregon").

The additional questions for which your office is seeking additional information and the responses are set forth below:

Q: In response to Q2b of the supplemental questions, how did you define services/episodes of care for each of the three service lines (palliative, hospice, and primary care)?

A: Each service line is defined differently. Primary care utilization was defined as the number of billable encounters with a primary care provider. Palliative care utilization was defined as the number of patient months. Hospice utilization was defined as the number of patient days.

Q: Please more fully describe "which payers and lines of business Chapters expects will be impacted" by plans to diversify and expand payer mix for Housecall LLC and Housecall PC. By "lines of business", we are referring to commercial, Medicare, Medicaid, etc.

A: In general, Chapters does not approach diversification and expansion based exclusively on insurance type but rather focuses growth on the medical and social needs of the community, identifying where additional patient access would be beneficial. After the Closing Chapters will

collaborate with the executive leadership team at Housecall Providers to determine where opportunities exist to diversify and expand the payer mix for its three clinical service lines (hospice, palliative care, and primary care) with this population health goal in the forefront. This collaboration will be critical because there are regional payers in the Housecall Providers service area with which Chapters does not have pre-existing relationships. Where feasible and appropriate, Chapters' goal will be to utilize its expertise and scale to assist Housecall Providers to develop or expand, as appropriate, contracts with both Medicare and commercial payers that have a national presence and provide services in line with Chapters' mission. Discussions between Chapters and Housecall Providers to facilitate these goals will commence in earnest promptly upon the Closing of the affiliation. Regarding the Medicaid line of business in Oregon, Chapters and Housecall Providers both have a demonstrable commitment to Medicaid and Medicaid-like program recipients across a wide swath of service offerings. Housecall Providers has substantial expertise in collaborating with coordinated care organizations across the state that Chapters intends to build on. Chapters' intent is to support this dedication to serving some of the most vulnerable Oregonians as this is part of Chapters' broader mission as a health system.

I trust that this letter is responsive to the inquiries we received. Please do not hesitate to contact me if you require further information.

Very truly yours,



Dale S. Webber

cc: Monica D. Martinez, Esq., VP / General Counsel, CareOregon
L. David Connell, Esq., Buchalter