

October 16, 2026

By Email (hcmo.info@oha.oregon.gov)

Oregon Health Authority
500 Summer Street, NE, E-20
Salem, OR 97301-1097

Re: 094 DocGo-Hicuity – Response to HCMO 10/2/26 Request for Information

Dear Mr. Goldman:

We are submitting this letter in response to your Attachment B: Request for Information (“RFI”) from your letter of October 2, 2026 regarding the Notice of Material Change Transaction (“Notice”) submitted in connection with the proposed transaction between Ambulnz Holdings, LLC d/b/a DocGo (“DocGo”) and Hicuity Health, Inc. (“Hicuity”).

Please find responses to the RFI below. For your convenience, the information requests included in your October 2, 2026 RFI are repeated in bold below, followed by DocGo and Hicuity’s responses.

- 1. Entities state in the notice that Cardiac RMS LLC contracts with physician practices and health systems in Oregon to provide “remote patient monitoring and care coordination services.” Please provide a detailed description of these services, including the following information:**
- 2. How patients in Oregon access services and how payment is handled.**

Patients receive CRMS remote monitoring services in connection with participating physician practices and health systems with which CRMS has contractual relationships. CRMS operates under a hybrid billing model with PeaceHealth. For Medicare beneficiaries, CRMS bills Medicare directly as an Independent Diagnostic Testing Facility (IDTF), and CRMS bills Medicare patients for their required cost-sharing. For all other payors, PeaceHealth bills for the services and pays CRMS a flat fair market rate for the technical portion of the work performed. CRMS is not able to comment on patient cost-sharing for patients billed by PeaceHealth. For Bay Area

Hospital, CRMS operates under a fee-for-service model in which CRMS invoices Bay Area Hospital for services performed. CRMS does not bill patients directly.

b. Setting of care (e.g. home, hospital, other facility).

Services are delivered remotely through CRMS's technology-enabled cardiac device monitoring model.

c. Timing of service delivery (e.g., post-surgery, post-discharge).

Remote monitoring is ongoing rather than limited to a single episode of care. This monitoring is performed as part of ongoing continued outpatient care delivery for a variety of cardiovascular conditions. These cardiovascular conditions are of a nature that requires an implanted device such as a pacemaker, defibrillator, or loop recorder to have been placed. Depending on the implanted device type, a patient's device may transmit data approximately 4–12 times annually.

d. Titles and qualifications of staff who deliver services directly to patients.

Services for PeaceHealth and Bay Area Hospital are performed by Patient Care Specialists and/or Arrhythmia Specialists, who are cardiac device specialists holding International Board of Heart Rhythm Examiners (IBHRE) certification or Certified Rhythm Analysis Technician (CRAT) certification. A team of Engagement Specialists provides non-clinical support by performing outreach to ensure patients remain connected and continue transmitting the requested clinical data from their devices so the required clinical work can be completed.

e. The remote or technology-enabled care model used to deliver services.

CRMS utilizes a remote CIED monitoring model in which data transmitted from a patient's implanted cardiac device is received remotely, reviewed and triaged by CRMS, and a report is prepared for review by the patient's physician. CRMS also supports patient engagement and compliance with the remote monitoring process.

2. Provide a list of Cardiac RMS LLC's contracts with health system and physician practices in Oregon. For each such contract, please provide:

a. Parties to the contract.

PeaceHealth: Cardiac RMS, LLC and Cardiology at PeaceHealth Oregon Heart & Vascular Institute, 3311 RiverBend Dr, Suite 300, Springfield, OR 97477.

Bay Area Hospital: Cardiac RMS, LLC and Bay Area Hospital, 3950 Sherman Ave, North Bend, OR 97459.

b. A description of the services provided under the contract.

PeaceHealth: Remote cardiac implantable electronic device (CIED) monitoring and related care coordination services, including remote receipt, review and triage of device transmissions, preparation of reports for physician review, and patient engagement and outreach to support ongoing transmission compliance.

Bay Area Hospital: The same remote CIED monitoring and related care coordination services provided under the PeaceHealth contract.

c. Date on which the contract was executed.

PeaceHealth: September 21, 2022.

Bay Area Hospital: May 23, 2024.

d. A summary of the contracted payment terms.

PeaceHealth: Under the hybrid billing model described above, CRMS bills Medicare directly as an IDTF for Medicare beneficiaries, and PeaceHealth pays CRMS a flat fair market rate for the technical portion of services for patients covered by all other payors. Payment is for reportable/billable services performed during each monitoring period (31 or 91 days, depending on monitoring requirements and device type). The contract also includes a nominal per-patient-per-month software fee, which PeaceHealth pays directly to CRMS; patients are not billed for this fee.

Bay Area Hospital: Fee-for-service. CRMS invoices Bay Area Hospital for services performed under the contract. CRMS does not bill patients directly.

3. Describe in detail the “telehealth-related services” provided by SteadyMD Physician Group, P.C. and SteadyMD, LLC in Oregon, including the following items:

a. A description of how patients in Oregon access these services and how payment is handled. Do these entities contract with health systems, providers, insurers, employers, etc.?

The majority of patients access services through SteadyMD’s clients, often by way of a direct-to-consumer campaign. Patients typically pay the client directly for these services, generally out of pocket rather than through insurance or another third-party payer.

b. Characteristics of the patients who typically receive these services, including medical conditions/diagnoses.

Patients who typically receive SteadyMD services are those who present to urgent care or primary care settings for treatment of common acute and episodic conditions, including respiratory infections, dermatological conditions, gastrointestinal issues, urinary tract infections, minor injuries, medication refills and other outpatient healthcare needs. In addition, SteadyMD services are used to provide longitudinal care, including initial evaluations, follow-up consultations, medication management, laboratory monitoring, nutritional counseling and treatment support for weight management. Finally, SteadyMD services are used alongside laboratory services for screening and wellness testing, results review, clinical counseling and follow-up treatment when appropriate.

c. Setting of care (e.g. home, hospital, other facility).

Services are delivered remotely through a telehealth model.

d. Timing of service delivery (e.g., following an in-person outpatient visit, post-surgery, post-discharge).

Services are available 24/7 and may be on demand for acute, urgent care service lines or scheduled for longitudinal care programs, such as weight management, depending on contracted partner needs.

e. Titles and qualifications of clinical staff who deliver services directly to patients.

Clinical staff who deliver services directly to patients include physicians, nurse practitioners, and physician assistants.

f. The remote or technology-enabled care model used to deliver services.

SteadyMD uses several modalities to deliver care through its technology platform, including asynchronous two-way messaging, synchronous video visits, and phone visits.

4. Provide a list of SteadyMD Physician Group and SteadyMD, LLC contracts with customers in Oregon. For each such contract, please provide:

a. Parties to the contract.

SteadyMD provides telehealth-related services through contractual arrangements with customers operating nationally, including customers whose patients receive services in Oregon. These agreements generally provide coverage across all 50 states and Washington, D.C., rather

than being specific to Oregon. The customer agreements identified in the accompanying schedule are executed by SteadyMD Physician Group, P.C. and/or SteadyMD, Inc., rather than SteadyMD, LLC, as referenced in the RFI.

b. A description of the services provided under the contract.

Please see **Attachment No. 22** for information on the services provided under SteadyMD Physician Group and SteadyMD, Inc. contracts.

c. Date on which the contract was executed.

Please see **Attachment No. 22** for information on the contract execution dates.

d. A summary of the contracted payment terms.

Please see **Attachment No. 22** for information on the contracted payment terms.

5. Provide a list of zip codes in Oregon where DocGo has provided services over the past twelve months or most recent fiscal year.

DocGo's existing Oregon operations are conducted through SteadyMD and CRMS. A consolidated list of Oregon ZIP codes in which those businesses provided services during the requested period is provided separately. Please see **Attachment No. 21** for a list of zip codes in Oregon where DocGo has provided services over the past 12 months. CRMS provided services associated with ZIP codes 97477 (Cardiology at PeaceHealth Oregon Heart & Vascular Institute, Springfield, Oregon) and 97459 (Bay Area Hospital, North Bend, Oregon) and does not have access to all patient-level data to detail this further. SteadyMD identified 337 unique Oregon ZIP codes served during the last twelve months.

6. To the extent available in DocGo's ordinary course reporting, please provide a breakdown of DocGo's revenues attributable to Oregon in the most recent fiscal year:

a. By service line (telehealth-related services, remote monitoring and care coordination);

DocGo does not maintain, in its ordinary-course financial reporting, Oregon-specific revenue broken down by each of the categories requested in Items 6(a)–(c). DocGo's current Oregon operations are conducted through SteadyMD, LLC and Cardiac RMS, LLC ("CRMS"). SteadyMD's Oregon activity consists of telehealth-related services, while CRMS's Oregon activity consists of remote cardiac device monitoring and related care coordination services. Based on the operational information available for the most recent twelve-month periods, SteadyMD had approximately 6,096 Oregon episodes of care and 9,184 Oregon consultations, and CRMS had approximately 3,820 average monthly Oregon patients, with approximately

18,299 Oregon billable events during the applicable twelve-month measurement period. Because DocGo does not maintain Oregon-specific revenue in the ordinary course at the requested level of granularity, it is not able to provide a reliable revenue breakdown by service line, customer type, or insurance type without creating allocations or estimates that are not part of its ordinary-course reporting.

b. By customer type (e.g. health systems, physician practices, insurers, etc.)

See response to Item 6(a) above.

c. By type of insurance (e.g., Commercial, Original Medicare, Medicare Advantage, Medicaid/Oregon Health Plan).

See response to Item 6(a) above.

7. Please provide the following information on Hicuity's services in Oregon:

a. The name of the health system Hicuity is contracted with.

Hicuity Health is contracted with [REDACTED] for these services in Oregon. The contract is among Hicuity Health Inc., [REDACTED]

b. A description of the medical conditions, diagnoses, or other characteristics that would qualify patients for these services.

Patients are admitted to the program by our health system client. The patients are acute enough to be treated in a hospital, but stable enough to be treated at home. Patients go through a health and social screen which reviews a patient's diagnosis/condition, acuity, insurance, proximity to a hospital, availability of a caregiver, mobility, and access to electricity, internet, food/water, and other social determinants of health as a condition of eligibility to be treated at home.

Typical conditions or diagnoses include but are not necessarily limited to: cellulitis and other skin/soft tissue infections, urinary tract infections/pyelonephritis, pneumonia/respiratory infections, dehydration or electrolyte abnormalities, complications of chronic conditions such as COPD, asthma, diabetes, and CHF.

8. Per Attachment 20, Ambulnz Holdings, LLC acquired SteadyMD, Inc. in October 2025, but the transaction was determined to be non-reportable under HCMO rules and statute. Please clarify why the Entities deemed this transaction not subject to HCMO review.

Ambulnz Holdings, LLC acquired SteadyMD, Inc., which is now SteadyMD, LLC, in October 2025. In connection with the transaction, the parties evaluated the applicability of Oregon's Health Care Market Oversight (HCMO) reporting requirements, with the assistance of outside legal counsel.

Based on the facts and circumstances of the transaction, the parties determined that an HCMO filing was not required under OAR 409-070-0015(2). [REDACTED]

[REDACTED] Based on these considerations and the applicable regulatory framework, the parties concluded that the October 2025 SteadyMD, Inc. acquisition was not reportable under the HCMO rules.

Very truly yours,

Davis Wright Tremaine LLP



Kaley L. Fendall

cc: