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August 30, 2017

BY HAND DELIVERY

Mr. Peter Boswell  
Virginia Department of Health  
9960 Mayland Drive, Suite 300  
Henrico, VA 23233

**Mountain States Health Alliance and Wellmont Health System –  
Additional Information**

Dear Peter:

Enclosed on a computer disc is some additional information from Mountain States and Wellmont relating to their Application for a Cooperative Agreement. Below is a list of the information. As indicated, the parties believe all of the information is proprietary for confidential treatment by the Department of Health and the Virginia Office of Attorney General.

1. **Ballad Health Policies.** At the meeting with the parties on August 8, 2017, the Commissioner expressed interest in seeing the formal policies that Ballad Health has already adopted. There are nine policies provided.

The Parties believe that the Ballad Health policies are proprietary, confidential and competitively sensitive under federal antitrust laws. The Parties submit the Ballad Health policies separately to the Virginia State Health Commissioner and the Attorney General for the Commonwealth of Virginia as information that is required to remain confidential under Virginia Code Section 15.2-5384.1.C.1 and Virginia's Rules and Regulations Governing Cooperative Agreements (12VAC5-221-40.D).

2. **Functional Team Information.** At the August 8<sup>th</sup> meeting, the Commissioner also expressed interest in seeing information about the Functional Teams established by the parties to engage in general consolidation planning, including minimizing disruption of ongoing services and programs. The Functional Team information includes a general description of the Functional Teams and project plans for each Team.

The Parties believe that the Functional Team information is proprietary, confidential and competitively sensitive under federal antitrust laws. The Parties submit the Functional Team information separately to the Virginia State Health Commissioner and the Attorney General for the Commonwealth of Virginia as information that is required to remain confidential under Virginia Code Section 15.2-5384.1.C.1 and Virginia's Rules and Regulations Governing Cooperative Agreements (12VAC5-221-40.D).

- 3. Mountain States CMS Accountable Health Communities Grant Application.** The Commissioner expressed interest at the May 17, 2017 meeting with the parties in seeing the application Mountain States submitted to CMS in connection with the Accountable Health Communities grant it received.

Mountain States believes that its CMS Accountable Health Communities Grant Application is proprietary, confidential and competitively sensitive under federal antitrust laws. Mountain States submits the Application separately to the Virginia State Health Commissioner and the Attorney General for the Commonwealth of Virginia as information that is required to remain confidential under Virginia Code Section 15.2-5384.1.C.1 and Virginia's Rules and Regulations Governing Cooperative Agreements (12VAC5-221-40.D).

- 4. Mountain States Amended Exhibit M-2A to Responses to the Commissioner's Request dated December 22, 2016.** In an effort to provide more detail about individual payer revenues, Mountain States provides Amended Exhibit M-2A in response to the Commissioner's request dated December 22, 2016. Amended Exhibit M-2A includes revenue detail for individual payers as well as for the payer groups identified on the original Exhibit M-2A. Mountain States notes that the gross and net revenues may vary somewhat from the original Exhibit M-2A submitted on February 8, 2017, (Response #9) because charges may change after patients are discharged and the payments will continue to be updated until an account is completely finalized.

Mountain States believes that Amended Exhibit M-2A is proprietary, confidential and competitively sensitive under federal antitrust laws. Mountain States submits this Exhibit separately to the Virginia State Health Commissioner and the Attorney General for the Commonwealth of Virginia as proprietary information that is required to remain confidential under Virginia Code Section 15.2-5384.1.C.1 and Virginia's Rules and Regulations Governing Cooperative Agreements (12VAC5-221-40.D).

- 5. Joint Information Provided in Connection with the Tennessee COPA Application.** The parties provide as Exhibit N-9.Am3 certain additional information relating to the Tennessee COPA Application.

The Parties believe that Exhibit N-9.Am3 is proprietary, confidential and competitively sensitive under federal antitrust laws. The Parties submit this Exhibit separately to the Virginia State Health Commissioner and the Attorney General for the Commonwealth of Virginia as information that is required to remain confidential under Virginia Code Section 15.2-5384.1.C.1 and Virginia's Rules and Regulations Governing Cooperative Agreements (12VAC5-221-40.D).

- 6. Wellmont Information Provided in Connection with the Tennessee COPA Application.** Wellmont provides as Exhibit N-9.Am4 certain additional information relating to the Tennessee COPA Application.

Wellmont believes that Exhibit N-9.Am4 is proprietary, confidential and competitively sensitive under federal antitrust laws. Wellmont submits this Exhibit separately to the

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Virginia State Health Commissioner and the Attorney General for the Commonwealth of Virginia as proprietary information that is required to remain confidential under Virginia Code Section 15.2-5384.1.C.1 and Virginia's Rules and Regulations Governing Cooperative Agreements (12VAC5-221-40.D).

Please let me know if you have any questions about this information.

Sincerely,



Jennifer McGrath

Enclosure

cc: Erik Bodin  
Allyson Tysinger  
Tyler Henry