



**CONFIDENTIAL, NOT FOR PUBLIC RELEASE
PER ORS 415.501(13)(c) AND ORS 192.345(2)**

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December 30, 2022

VIA EMAIL AND OVERNIGHT DELIVERY

Oregon Health Authority
421 SW Oak St
Suite 850
Portland, OR 97204

Oregon Department of Consumer and Business Services
350 Winter Street NE, Fourth Floor
Salem, OR 97301-3883

Re: Notice of Material Change Transaction and Form A Filing

To Whom it May Concern,

CareOregon, Inc. (“CareOregon”) and SCAN Group (“SCAN”) are submitting required filings to the Oregon Health Authority (“OHA”) and Department of Consumer and Business Services (“DCBS”) regarding the proposed affiliation between the two entities. CareOregon and SCAN consider certain documents and information contained in these filings confidential and not subject to public disclosure. Per OAR 409-070-0070, the parties are providing a log identifying confidential documents and explaining the grounds for asserting confidentiality.

Under ORS 415.501(13)(c), OHA “shall maintain the confidentiality of all confidential information and documents that are not publicly available that are obtained in relation to a material change transaction.” Such information is “exempt from disclosure under ORS 192.311 to 192.478 [the Public Records Act].” The documents listed below are confidential and contain information that is not publicly available. Thus OHA shall maintain the confidentiality of such documents and shall not release any such documents under the Public Records Act.

Furthermore, under ORS 192.345 “trade secrets” are exempt from disclosure under the Public Records Act. The term “trade secrets” is defined to include any “compilation of information . . . which is known only to certain individuals within an organization and which is used in a business it conducts, having actual or potential commercial value, and which gives its user an opportunity to obtain a business advantage over competitors who do not know or use it.” ORS

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192.345(2). The documents identified below contain information related to future plans and corporate organization that, individually and collectively, have business value to the parties.

Finally, ORS 192.355(2)(a) protects “personal nature such as but not limited to that kept in a personal, medical or similar file, if public disclosure would constitute an unreasonable invasion of privacy, unless the public interest by clear and convincing evidence requires disclosure in the particular instance.” The biographical affidavits submitted as part of the Form A applications contain such information.

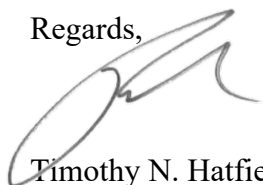
The following page contains a log of those documents that the parties consider confidential and not subject to public disclosure:

Document Description	Grounds for Confidentiality
Exhibits C, G, I and J to Form A with respect to Columbia Pacific CCO, LLC and Jackson County CCO, LLC	ORS 415.501(13)(c), ORS 192.345(2) and ORS 192.355(2)(a)
Exhibits C, F, H and I to Form A with respect to Health Plan of Care Oregon, Inc.	ORS 415.501(13)(c), ORS 192.345(2) and ORS 192.355(2)(a)
NPI Form	ORS 415.501(13)(c) and ORS 192.345(2)
Pages iii, 56 and 57 of the Affiliation Agreement by and between SCAN Group and Care Oregon	ORS 415.501(13)(c) and ORS 192.345(2)

This log in no way limits either party’s right to assert additional or alternative grounds for deeming the above-listed documents confidential.

Please contact me prior to responding to any request for release of any of the above-listed documents or any description of their contents.

Regards,



Timothy N. Hatfield