



**Adventist Health Portland**  
10123 SE Market St  
Portland, OR 97216

November 30, 2023

Sarah Grabe  
Hospital Community Benefit Program Coordinator  
Oregon Health Authority  
Office of Health Analytics

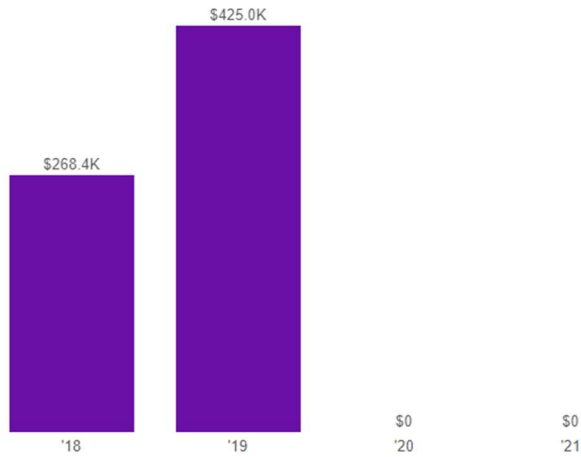
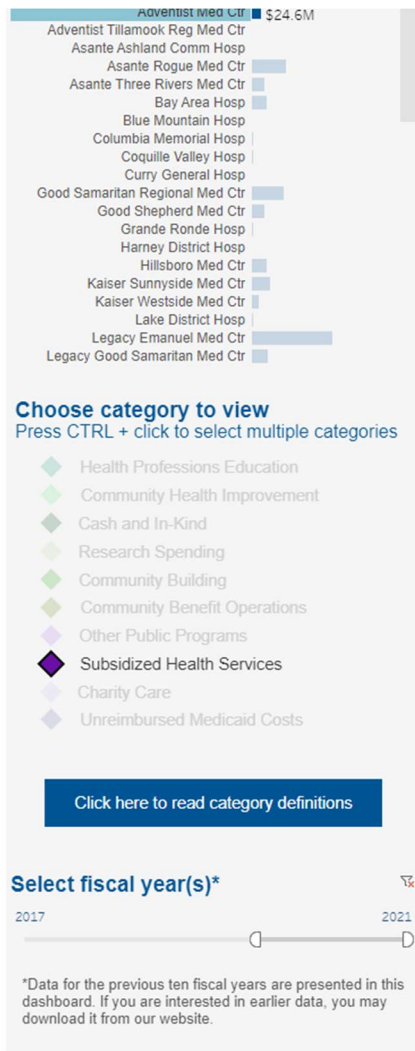
Dear Ms. Grabe,

Thank you for your letter dated 10/31/23, outlining the proposed minimum spending floor (MSF) for the years 2024 and 2025 for Adventist Health Portland. After reviewing the proposed MSF and corresponding calculations that were provided, we feel the proposed spending floor is unattainable based on factors outlined below:

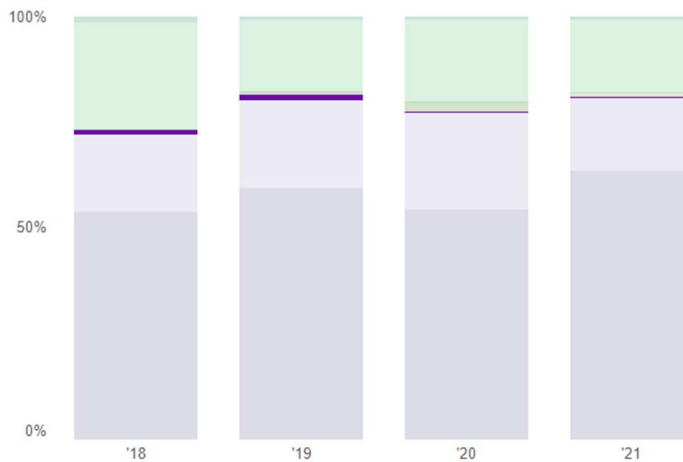
1. Review of the FY 2022 AHPL OR State CBR-1 form that was filed on 8/25/23 from this office revealed several discrepancies due to an incorrect cost to charge ratio that was not consistent with prior years' methodology nor aligned with the Adventist Health system calculations. We have attached an Amended FY 2022 AHPL OR State CBR 1 form which resolves this error. Please note that that the overall Community Benefit Totals have decreased. The attached amended FY 2022 CBR1 form now has a corrected total Community Benefit Total of \$24,600,153 with a variance of **\$3,142,004**.
2. Review of the Subsidized Health Services in the amount of \$2,905,081 per our Amended FY 2022 AHPL OR State CBR 1 form has revealed that FY 2022 is an outlier for Adventist Health Portland. This was the first year that AHPL saw a loss in their Labor and Delivery department. The loss in FY 2022 was predicated by several factors present in the broader healthcare landscape in FY 2022 which drove high losses including low volumes, high supply costs and high contract labor costs. As FY 2022 was unique during post-COVID recovery, we do not anticipate these to experience the same losses going forward.

As a possible solution to accommodate this anomaly, we are requesting a five-year look-back for subsidized health services. Looking back at the last five years of subsidized services for AHPL, you will see for years 2018 and 2019 that subsidized services were approximately 1% of the total community benefit spending in dollars. For years 2020 and 2021, subsidized services were at zero percent of the total community benefit spending in dollars. In 2022, subsidized services at \$2,905,081 is approximately 12% of the total community benefit spend. Please note that the calculation of 12% is based on the revised CBR1 form Community Benefit total of \$24,600,153.

On the following page, you will find a screenshot of the Oregon Health Authority Community Benefit Spending Dashboard for Subsidized Health services for years 2018 - 2021.



**Percent of total community benefit spending by category**  
Adventist Med Ctr



Based on the analysis of our historical values for subsidized services for the past years, we are asking that OHA deviate from the standard three-year average and use the prior five-year average.

Adventist Health Portland respectfully requests a reduction to our FY 2024 and FY 2025 proposed community benefit minimum spending floor.

Thank you for your time and consideration. If you have any questions or would like additional information regarding the issues as noted, please feel free to reach out to myself at [panasuja@ah.org](mailto:panasuja@ah.org) or 503-261-4405 or Cecily Geschke, Director of Finance, at [geschkb@ah.org](mailto:geschkb@ah.org) or 503-251-6862.

Sincerely,

Jason Panasuk  
Finance Officer, Adventist Health Portland