



Allan S. Graves  
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**VIA EMAIL**

January 15, 2021

Cecile Young  
Executive Commissioner  
Texas Health and Human Services Commission  
Brown-Heatly Building  
4900 North Lamar Blvd.  
Austin, Texas 78751-2316  
[COPA@hhs.texas.gov](mailto:COPA@hhs.texas.gov)

**Re: Shannon Health System, Inc. COPA Baseline Performance Report**

Dear Ms. Young:

In accordance with the Certificate of Public Advantage (COPA) Terms and Conditions of Compliance for Shannon Health issued on October 2, 2020 by the Texas Health and Human Services Commission (the "Agency") and the COPA Reporting Instructions for Shannon Medical Center subsequently provided by the Agency, we submit the attached baseline reporting materials required under Texas Health and Safety Code Chapter 314A and Texas Administrative Code Title 26, Chapter 567. The attached materials include the following: (1) COPA Baseline Performance Report; (2) COPA Baseline Performance Report Attachments; and (3) COPA Baseline Performance Report Excel Data.

We submit duplicate versions of the attached baseline reporting materials pursuant to Section 314A.052(b) of Chapter 314A, Title 4 of the Official Code of Texas: (1) nonpublic versions that contain complete information for the Agency's review (which clearly identify proprietary information through bold bracketed red font at the beginning of each relevant response in the report or through shading and a legend in the excel data) and (2) redacted versions for public release. Please note that the nonpublic versions contain proprietary and competitively sensitive information that is required to remain confidential and is protected from public release. Therefore, we request confidential treatment of the nonpublic baseline reporting materials in accordance with all applicable statutes, rules, and regulations.

Sincerely,

Allan S. Graves  
General Counsel/Chief Legal Officer

cc: Shane Plymell, CEO  
Kenneth W. Field, Jones Day  
Kristi Jordan, HHSC