



July 14, 2020

Executive Commissioner Phil Wilson
cc: Victoria Ford, Acting Chief Operating Officer & Kristi Jordan, Director, Health Care Quality,
Regulatory Services Division
Texas Health and Human Services Commission
Brown-Heatly Building
4900 North Lamar Blvd.
Austin, Texas 76711-3247

Re: Shannon Medical Center Certificate of Public Advantage (COPA)

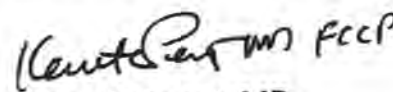
Dear Executive Commissioner Phil Wilson,


As we continue to navigate our response to the COVID-19 pandemic, the need to better coordinate services and optimize resources has never been more important. The rising need to respond to this pandemic clearly illustrates the importance of coming together as one to implement the most effective practices to create a strong health system. Collaboration and utilization of resources is key, and we believe Shannon has the ability to make significant headway in responding to the increasing health needs of our community and region as COVID-19 cases continue to rise.

For example, a combined system in our community would offer increased capacity of Intensive Care Unit (ICU) beds by aligning staffing resources to meet the increased demand. Today, each ICU is operating independently. With the approval of this acquisition, Shannon would have the opportunity to meet staffing needs at both campuses to optimize the use of the available beds. Furthermore, by consolidating resources to a specified unit and/or campus in our community, Shannon has the ability to preserve available Personal Protective Equipment (PPE), better manage the care and treatment for patients with COVID-19, as well as continue meeting all other health needs of the community.

We strive to remain vigilant in our efforts to provide a locally-driven, community based response to keep our community safe during these times. We urge you to approve this acquisition of San Angelo Community Medical Center as we plan to continue our response efforts to COVID-19.

Sincerely,


Kenneth Perret, MD
Pulmonologist
Shannon Physician COVID-19 Task Force


Michael Wood, MD
Hospitalist
Shannon Physician COVID-19 Task Force



June 17, 2020

SAN ANGELO
AREA FOUNDATION

221 S. IRVING ST.
SAN ANGELO, TX 76903
325-947-7071
325-947-7322 FAX
WWW.SAAFOUND.ORG

MATT LEWIS
PRESIDENT & CEO

Executive Commissioner Phil Wilson
Texas Health and Human Services Commission
Brown-Heatly Building
4900 North Lamar Blvd.
Austin, Texas 76711-3247

Re: Shannon Medical Center Certificate of Public Advantage (COPA)

Dear Executive Commissioner Phil Wilson,

I am writing to ask you to grant a Certificate of Public Advantage (COPA) to Shannon West Texas Memorial Hospital, allowing it to move forward with the acquisition of San Angelo Community Medical Center.

As President & CEO of the San Angelo Area Foundation, I understand the impact of healthcare on a community like ours. The San Angelo Area Foundation was established in 2002 as a community foundation whose mission is to improve quality of life in the San Angelo area by assisting philanthropic individuals aggregate funds to benefit the area. More than 7,000 donors have contributed over \$200 million dollars since inception and have created more than 330 funds. Over \$100 million have been awarded in grants all supporting a wide array of causes in San Angelo and the surrounding area. We understand the value of trusted community partners and Shannon exemplifies these values.

Shannon has been a part of our community and surrounding region for almost 100 years. They are known far and wide as a trusted health care provider. I believe it is critically important that we do everything possible to ensure we maintain a broad range of high-quality healthcare services in our community. After watching numerous rural hospitals close their doors both in Texas and across the country, I believe this acquisition offers the best opportunity to maintain vital healthcare services in our community and our region of west Texas.

In order to have a strong, healthy workforce and economy, it is critically important that our community continue to have access to high quality care that leads to improved outcomes and health. I am proud to support Shannon and the work the organization is doing to improve the health and quality of life for all who call San Angelo home. I encourage you to approve this acquisition and preserve our access to the highest-quality of care at the lowest cost in our region.

Yours truly,

Matt Lewis

cc: Victoria Ford, Acting Chief Operating Officer & Kristi Jordan, Director
Health Care Quality, Regulatory Services Division



6/10/2020

Executive Commissioner Phil Wilson

cc: Victoria Ford, Acting Chief Operating Officer & Kristi Jordan, Director, Health Care Quality,
Regulatory Services Division
Texas Health and Human Services Commission
Brown-Heatly Building
4900 North Lamar Blvd.
Austin, Texas 76711-3247

Re: Shannon Medical Center Certificate of Public Advantage (COPA)

Dear Executive Commissioner Wilson,

On behalf of Baptist Retirement Community, I am writing to express our organization's support for Shannon West Texas Memorial Hospital's acquisition of San Angelo Community Medical Center. Our organization is a large senior living community, with independent living, assisted living, long term care, short term skilled care, and memory care. We are expressing our support because a strong and robust healthcare system is essential to for the associates and residents and we serve at Baptist. It is also essential to our community's success. Without the services these health systems provide, those we serve would experience challenges like:

- Hospital bed shortages
- Lack of medical specialty providers
- Fragmented healthcare communication systems
- Increased necessity to travel out of the area for health services.

Shannon West Texas Memorial Hospital has been a part of our community for many years, and they are active in the region and trusted by many for their care. As part of the acquisition, Shannon will be able to invest in new technology, upgrades to Community's facility and expanding services. This is especially important because these two hospitals serve a very large region of people in West Texas, many of which drive for our hours for their care.

By coming together as one, Shannon and Community Medical Center will collaborate to implement the most effective practices, protocols, and programs at each hospital, ultimately creating a stronger combined health system. By leveraging the best practices that have led to Shannon's 5-star rating from CMS, a top cardiovascular program and multiple awards for quality, the organizations will be able to elevate the standard of care locally. By working together, local residents will benefit from more coordinated care and clinical integration across facilities and services in the community.



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Looking forward, there is an opportunity to do even more. I am encouraged about what this means for the quality of, and access to, healthcare in our region. I'm proud to support Shannon and the work the organization is doing to improve the health and quality of life for all who call San Angelo home. I encourage you to approve this acquisition and preserve our access to the highest quality of care at the lowest cost in our region.

Sincerely,

Aaron Hargett

Executive Director

Baptist Retirement Community

902 N. Main St.

San Angelo, Texas 76903

Office: 325-657-9102

Fax: 325-655-2574

buckner.org

Baptist Retirement Community. Inspiring happiness.®



902 N Main St • San Angelo, TX 76903
Phone: (800) 608-8820 Fax: (325) 653-1413
Email: baptistretirement@buckner.org
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Preferred Hospital Leasing Eldorado, Inc.
102 North US Highway 277
Eldorado, TX 76936
Telephone: (325) 853-2507
Fax: (325) 853-3976
www.scmc.us

June 3, 2020

Executive Commissioner Phil Wilson

cc: Victoria Ford, Acting Chief Operating Officer & Kristi Jordan, Director, Health Care Quality,
Regulatory Services Division

Texas Health and Human Services Commission

Brown-Heatly Building

4900 North Lamar Blvd.

Austin, Texas 76711-3247

Re: Shannon Medical Center Certificate of Public Advantage (COPA)

Dear Executive Commissioner Phil Wilson,

I'm writing to ask you to grant a COPA to Shannon West Texas Memorial Hospital, allowing it to move forward with the acquisition of San Angelo Community Medical Center.

As Administrator of Schleicher County Medical Center I understand the impact of healthcare on a community like Schleicher County.

Since 2010, 20 rural Texas hospitals have closed – more than any other state. Furthermore, 63 counties in Texas don't have a hospital at all. This acquisition ensures the residents of West Texas will continue to have access to the healthcare services they need for generations to come. By coming together as one, Shannon has the ability to make significant headway in addressing the health needs for residents in our region. As one organization, Shannon will be able to make an even bigger impact on some of the biggest health issues in our region including heart disease, diabetes and cancer.

I am proud to support Shannon and the work the organization is doing to improve the health and quality of life for all who call San Angelo home. I encourage you to approve this acquisition and preserve our access to the highest-quality of care at the lowest cost in our region.

Sincerely,

A handwritten signature in blue ink, appearing to read "Paul Burke". The signature is fluid and cursive, with the first name "Paul" and last name "Burke" clearly distinguishable.

Paul Burke
Administrator
Schleicher County Medical Center

May 21, 2020

Executive Commissioner Phil Wilson

cc: Victoria Ford, Acting Chief Operating Officer & Kristi Jordan, Director,
Health Care Quality, Regulatory Services Division

Texas Health and Human Services Commission

Brown-Healy Building

4900 North Lamar Blvd.

Austin, Texas 76711-3247

Re: Shannon Medical Center Certificate of Public Advantage (COPA)

Dear Executive Commissioner Wilson,

I am writing to express my support for the granting of a COPA to Shannon West Texas Memorial Hospital for the acquisition of San Angelo Community Medical Center. As the Medical Director of the San Angelo State Supported Living Center, I strongly believe we must ensure a broad range of healthcare services are available for all populations in our community.

The San Angelo State Supported Living Center is home to close to 200 people with intellectual and developmental disabilities who are medically fragile or who have behavioral problems. Our Center serves a 38-county area and employs more than 900 full time positions.

Shannon is our primary hospital provider to provide medical care for our **patients that are considered among the state's most vulnerable populations.** Our patients are medically complicated and fragile. Dysphagia, aspiration pneumonia, seizure disorders and gastrointestinal malfunctions are not uncommon. Our patients are hospitalized and utilize medical services more **often than would a "normal" ambulatory population. Therefore, treating** them is inevitably less profitable. Nonetheless, Shannon has consistently welcomed them.

Through this acquisition, Shannon can have an even more significant impact on addressing the health needs of our community. As the healthcare safety net that serves a large rural region of West Texas, it is critically important that our community continue to have access to high quality care that leads to improved outcomes and health.

I believe Shannon has the best interest of our community in mind, and I encourage you to approve their acquisition of San Angelo Community Medical Center.

Respectfully,

David A. Jolivet, M.D.

Director of Medical Services

San Angelo State Supported Living Center



The City Of
San Angelo, Texas
72 West College Avenue, San Angelo, Texas 76903

May 27, 2020

Executive Commissioner Phil Wilson

cc: Victoria Ford, Acting Chief Operating Officer & Kristi Jordan, Director, Health Care Quality,

Regulatory Services Division

Texas Health and Human Services Commission

Brown-Heatly Building

4900 North Lamar Blvd.

Austin, Texas 76711-3247

Re: Shannon Medical Center Certificate of Public Advantage (COPA)

Dear Executive Commissioner Phil Wilson,

Healthcare in America continues to be a major issue. In rural West Texas even more of an issue. As many small towns lose their hospitals or clinics it becomes an even more important issue. San Angelo serves a 17 county area so our health care system is vital to the citizens of this community. San Angelo is a regional health care community. With that being said it is important that healthcare become affordable and extensive in terms of the services and technology available. We all know that consolidation can and should provide savings and efficacies that benefit the communities. We also believe it should make health care more affordable and reliable. When a healthcare system can focus on quality of care, affordability of care everyone wins.

As a community we also know that our ability to recruit and maintain growth in businesses as well as our universities and school system depends on our ability to ensure great health care. Healthcare is an economic driver of a community. Healthcare is important to sustaining a community. Without affordable healthcare then communities dry up because no one wants to live in a city without a great health care system.

As mayor of the city of San Angelo I support the need to simplify our healthcare in San Angelo by consolidating the healthcare providers. We need to know that citizens do not need to leave this community to get the affordable healthcare they deserve.

With respect,

A handwritten signature in blue ink, reading "Brenda Gunter".

Brenda Gunter

Mayor of San Angelo.

5/26/2020

Executive Commissioner Phil Wilson

cc: Victoria Ford, Acting Chief Operating Officer & Kristi Jordan, Director, Health Care Quality,
Regulatory Services Division

Texas Health and Human Services Commission

Brown-Heatly Building

4900 North Lamar Blvd.

Austin, Texas 76711-3247

Re: Shannon Medical Center Certificate of Public Advantage (COPA)

Dear Executive Commissioner Wilson,

I am communicating my support for the authorization of a COPA to Shannon West Texas Memorial Hospital for the acquisition of San Angelo Community Medical Center. I have resided in San Angelo for 35 years. I attended Angelo State University, and after a short leave outside of San Angelo, I returned to make it my permanent home. While not on a major interstate, San Angelo is the hub of primary/critical/preventative care West of I-35 in Southwest Texas. It is pivotal that this community continue to grow and serve the rural areas within 150 miles of San Angelo. San Angelo must continue to provide premier healthcare to this section of the state.

Shannon's social obligation to the community is unmatched by any business in the area, much less any health service provider. Decades of service has earned them a trust factor from the surrounding population. The consolidation will allow Shannon to invest in new technology, upgrades to Community Hospital's facility, and expanding services. These two hospitals serve a vast region of people in West Texas, many of which drive for our hours for their care.

In addition to the care these two hospitals provide, these facilities are significant employers in our community. Shannon's growth plan will attract new healthcare professionals to our community, and it will better position us to attract the very best talent—critical to our long-term success.

While I watched the effects of COVID-19 on the nation, and how difficult it was for communities to manage, my position on the City Council of San Angelo allowed me unfiltered visibility into the interlocal relationship between Shannon and the community. To this day, San Angelo's management of the crisis is outstanding. A large part of that success is owed to Shannon. In summary, I would strongly suggest for the authorization of a COPA for the acquisition of SACMC.

Sincerely,

Tom Thompson

Single Member District Two (SMD2)

City Council, San Angelo, TX



HOWARD COLLEGE

Office of the President

RECEIVED

MAY 22 2020

**OFFICE OF THE
HHS EXECUTIVE COMMISSIONER**

"To be a Leader in Education. . . For Learning, For Earning, For Life"

5/18/2020

Executive Commissioner Phil Wilson

cc: Victoria Ford, Acting Chief Operating Officer & Kristi Jordan, Director, Health Care Quality,
Regulatory Services Division

Texas Health and Human Services Commission

Brown-Heatly Building

4900 North Lamar Blvd.

Austin, Texas 76711-3247

Re: Shannon Medical Center Certificate of Public Advantage (COPA)

Dear Executive Commissioner Wilson,

Howard College is pleased to support the Shannon Health System acquisition of San Angelo Community Medical Center. We see the acquisition as a positive for the community and Howard College, as it will keep healthcare decisions at a local level.

For over 60 years, Howard College has offered diverse academic courses and workforce training in multiple campuses across West Texas, including San Angelo. Shannon Medical Center and San Angelo Community Medical Center have both been long-time supporters of the Health Professions Programs at Howard College (HC), and are committed to the long-term success of these programs.

With local healthcare decision-making in San Angelo, Shannon Medical Center (SMC) has been an excellent partner with HC in many ways. SMC is the major clinical partner for the HC Emergency Medical Services, Licensed Vocational Nursing (LVN), Associate Degree Nursing (ADN), Radiologic Technology, Respiratory Care, and Surgical Technology programs. In 2016, Dr. Pam Bradshaw, **RN, DNP, MSN, MBA, NEA-BC**, Chief Nursing Officer/Chief Operations Officer at Shannon Medical Center, was instrumental in helping HC add the ADN and Accelerated ADN Program for LVN programs. Dr. Bradshaw was the college's lead business spokesperson at a Texas Board of Nursing hearing in which Howard College was requesting approval of the new programs. With her testimony, the new programs were unanimously approved.

HC Health Professions Programs would not be where they are today without the leased space at Shannon's St. John's campus. The below market rate rental Shannon provides has allowed HC to expand existing programs and created space to add new programs over the past twelve years.

Additionally, Shannon Medical Center is a major employer in San Angelo. Graduates from all our Health Professions Programs have begun their careers through Shannon's hospital and numerous clinics. Since the inception of the ADN and LVN to ADN nursing programs, over 65% of the graduates have started their careers at Shannon. By combining these two organizations, all healthcare decision-making will remain in the community and the partnerships with HC will become even stronger.

On behalf of Howard College, I encourage you to grant Shannon a Certificate of Public Advantage and preserve access to high quality, cost-effective healthcare for our future students and the residents of our region.

To be a Leader in Education...For Learning, For Earning, For Life!

Sincerely,

A handwritten signature in blue ink that reads "Cheryl T. Sparks". The signature is fluid and cursive, with the first name "Cheryl" and last name "Sparks" clearly legible.

Cheryl T. Sparks, Ed.D
President

MHMR Services for the Concho Valley

1501 W. Beauregard • San Angelo, TX 76901-4004 • (325) 658-7750 • www.mhmrcv.org



May 18, 2020

Executive Commissioner Phil Wilson

cc: Victoria Ford, Acting Chief Operating Officer & Kristi Jordan, Director, Health Care Quality,
Regulatory Services Division

Texas Health and Human Services Commission

Brown-Heatly Building

4900 North Lamar Blvd.

Austin, Texas 76711-3247

Re: Shannon Medical Center Certificate of Public Advantage (COPA)

Dear Executive Commissioner Phil Wilson,

I'm writing to request that you grant a COPA to Shannon West Texas Memorial Hospital, allowing it to move forward with the acquisition of San Angelo Community Medical Center. MHMR Services for the Concho Valley (MHMRCV) is expressing our support because we believe a strong and robust healthcare system is essential to our community's success.

MHMRCV is designated as the Local Mental Health and Local Intellectual & Developmental Disability Authority of the Concho Valley; a seven-county regional area. MHMRCV provides many services and supports to people who are considered "underserved", often having no insurance or very little supports. Mental health services primarily focus on those with a serious mental illness and those who enter a mental health crisis and are at risk of harm to self or others.

MHMRCV has a strong community partnership with Shannon West Texas Memorial Hospital that goes back many decades. Most recently is a partnership through the 1115 Transformation Waiver where Shannon co-locates a primary care provider at the MHMRCV adult psychiatric clinic. This healthcare provider works hand in hand with MHMRCV psychiatric staff to offer whole patient care for a population who often do not seek primary care or utilize an emergency room setting for their primary healthcare needs.

Additionally, as the local Mental Health Authority MHMRCV provides 24 hours a day, seven days a week psychiatric crisis services to individuals located in our catchment area. Crisis services often overlap where MHMRCV staff provide crisis assessments in local emergency departments. With Shannon acquiring Community Medical Center all process within the two emergency departments will become more uniform for our staff and improve care coordination for the patient.

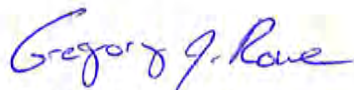
Furthermore, MHMRCV works closely with Shannon to contract for psychiatric inpatient care through Shannon Behavioral Health. MHMRCV has contracts with other local psychiatric hospitals where services are provided based on patient preference and availability of bed. However, it is noted that patients receive similar or better care through Shannon and have reduced inpatient stays. This results in earlier recovery for the patient and a reduced cost to taxpayers in our State.

From MHMRCV's perspective it is anticipated that with the acquisition of Community Medical Center, Shannon will improve patient access to not only primary care services, but be better able to provide psychiatric and behavioral healthcare for a larger portion of the West Texas region; especially an area that reaches to many rural communities. This will result in more people served in a more cost-effective manner and strengthen our healthcare resources.

By leveraging best practices, Shannon West Texas Memorial Hospital and Community Medical Center will be able to elevate the standard of healthcare locally. By working together, local residents will benefit from more coordinated care and clinical integration across facilities and services in the community. Looking forward, there is an opportunity to do even more. I am encouraged about what this means for the quality of, and access to, healthcare in our region. Shannon has the ability to make significant headway in addressing the health needs of our local population and I'm inspired by Shannon's vision to shape the future of healthcare here in West Texas.

I encourage you to grant Shannon a Certificate of Public Advantage as they continue to work towards improving the health and quality of life for our community and region.

Respectfully,



Gregory J. Rowe
Executive Director
MHMR Services for the Concho Valley

TOM GREEN COUNTY



May 19, 2020

Executive Commissioner Phil Wilson

cc: Victoria Ford, Acting Chief Operating Officer & Kristi Jordan, Director, Health Care Quality,
Regulatory Services Division

Texas Health and Human Services Commission

Brown-Heatly Building

4900 North Lamar Blvd.

Austin, Texas 76711-3247

Re: Shannon Medical Center Certificate of Public Advantage (COPA)

Dear Executive Commissioner Phil Wilson,

I'm writing to ask you to grant a COPA to Shannon West Texas Memorial Hospital, allowing it to move forward with the acquisition of San Angelo Community Medical Center. I believe it is critically important that we do everything possible to ensure we maintain a broad range of high quality healthcare services in our community. After watching numerous rural hospitals close their doors both in Texas and across the country, I believe Shannon's plan to acquire San Angelo Community Medical Center offers our community the best chance at protecting access to local healthcare services.

Communities like Tom Green County are under increasing pressure to make essential care available for residents across the region. Since 2010, 20 rural Texas hospitals have closed – more than any other state. Furthermore, 63 counties in Texas don't have a hospital at all. This acquisition ensures the residents of West Texas will continue to have access to the healthcare services they need for generations to come.

For the reasons listed above, I believe granting a COPA to be beneficial to our community. It has the opportunity to provide more options to ensure and preserve high quality and cost effective healthcare in rural West Texas.

Respectfully,

Stephen C. Floyd
County Judge

BILL SPILLER, County Judge
JIM QUINN, Commissioner Precinct 1
RANDY DEANS, Commissioner Precinct 2
JASON BEHRENS, Commissioner Precinct 3
RICK KEMP, Commissioner Precinct 4
JOHN DAGEN, Sheriff



MAGGIE SAWYER, Justice of the Peace
MARK A. MARSHALL, County Attorney
MICHELLE PITCOX, District Clerk
CHRISTINE JONES, County Clerk
SILVIA CAMPOS, Tax Assessor-Collector
MIKKIE WILLIAMS, County Treasurer

MCCULLOCH COUNTY
199 COURTHOUSE SQUARE ROOM 302
Brady Texas, 76825
Phone: 325-597-0733
Website: www.co.mcculloch.tx.us

May 20, 2020

Executive Commissioner Phil Wilson
cc: Victoria Ford, Acting Chief Operating Officer & Kristi Jordan, Director, Health Care Quality,
Regulatory Services Division
Texas Health and Human Services Commission
Brown-Heatly Building
4900 North Lamar Blvd.
Austin, Texas 76711-3247

Re: Shannon Medical Center Certificate of Public Advantage (COPA)

Dear Executive Commissioner Phil Wilson,
I wanted to write this support letter for all the great work that everyone is doing in the area. Being considered West Texas our healthcare is limited compared to our size. Shannon Healthcare is vital to everyone in West and Central Texas. They have a service area of hundreds of miles and we are dependent on their services. Many of the counties around McCulloch County do not have a hospital or have any services, all is sent to Shannon from Brady.

We will support Shannon Healthcare and whatever it takes. This acquisition will ensure the residents of Central and West Texas and will continue to have access to the healthcare services they need for generations to come.

Thank you,

A handwritten signature in blue ink that reads "Bill Spiller". The signature is fluid and cursive, with the first name "Bill" and last name "Spiller" clearly distinguishable.

Bill Spiller
McCulloch County Judge

5/18/2020

Executive Commissioner Phil Wilson
cc: Victoria Ford, Acting Chief Operating Officer & Kristi Jordan, Director, Health Care Quality,
Regulatory Services Division
Texas Health and Human Services Commission
Brown-Heatly Building
4900 North Lamar Blvd.
Austin, Texas 76711-3247

Re: Shannon Medical Center Certificate of Public Advantage (COPA)

Dear Executive Commissioner Wilson,

I am writing to express my support for the granting of a COPA to Shannon West Texas Memorial Hospital for the acquisition of San Angelo Community Medical Center. As a 25 year resident of San Angelo and Executive Director of The San Angelo Stock Show and Rodeo, I believe it is critically important that we do everything possible to ensure we maintain a broad range of high-quality healthcare services in our community.

Shannon has been a part of our community for many years, and they are active in the region and trusted by many for their care. As part of the acquisition, Shannon will be able to invest in new technology, upgrades to Community's facility and expanding services. This is especially important because these two hospitals serve a very large region of people in West Texas, many of which drive for hours for their care.

In addition to the care these two hospitals provide, these two facilities are major employers in our community. Shannon's plan will make it easier to attract new healthcare talent to our community, and it will better position us to attract the very best talent—critical to our long-term success.

Many rural communities are facing difficult challenges, like the closure of hospitals and essential services—which lead to even steeper economic decline. We have an opportunity to overcome these challenges and put in place protections for our community, including pricing and access, which are so important to those we serve.

Given the impact of COVID-19, it has never been more important that we have a strong, vibrant health care system on which to lean. I believe Shannon has the best interest of our community in mind, and I encourage you to approve their acquisition of San Angelo Community Medical Center.

Sincerely,



Justin Jonas
Executive Director
San Angelo Stock Show and Rodeo

May 15, 2020

Executive Commissioner Phil Wilson

cc: Victoria Ford, Acting Chief Operating Officer & Kristi Jordan, Director, Health Care Quality,
Regulatory Services Division

Texas Health and Human Services Commission

Brown-Heatly Building

4900 North Lamar Blvd.

Austin, Texas 76711-3247

Re: Shannon Medical Center Certificate of Public Advantage (COPA)

Dear Executive Commissioner Phil Wilson,

I am writing to share my support for the acquisition of San Angelo Community Medical Center by Shannon Medical Center. As an Internal Medicine physician with experience at Ballinger Memorial Hospital and Community Medical Associates, I believe it is critically important that our community and region continue to have access to high quality care that leads to improved outcomes and health. In the past, Shannon Medical Center and Community Medical Center were doing some of the same things in competition with one another, which I think increased dollars being used in health care without improving access to those needing care.

Ballinger Memorial Hospital is a 25-bed critical access hospital located in Ballinger, Texas serving a population of approximately 10,000 in Runnels County. In my three years as a physician in Ballinger, I believe it is critically important that we do everything possible to ensure we maintain a broad range of high-quality healthcare services. We have to refer patients at times for more specialty hospitalized care, and having 2 hospitals in San Angelo to refer to has been critical, as one is sometimes full. Through this transaction, Shannon will maintain the viability of both hospitals to ensure access is available to meet the healthcare needs of the region.

Since 2010, 20 rural Texas hospitals have closed – more than any other state. Furthermore, 63 counties in Texas don't have a hospital at all. This acquisition ensures the residents of West Texas will continue to provide access to healthcare services needed to serve the region.

Far too often, people in rural communities both in Texas and across the country experience poor health outcomes because care is more difficult to access and healthcare providers lack resources to invest in new technology. Our community, and the greater West Texas region, has been fortunate to have both San Angelo and Shannon, and it is important that they continue to have a robust healthcare system to serve as the healthcare safety net going forward.

I encourage you to approve this acquisition and preserve our access to the highest-quality of care at the lowest cost in our region.

Sincerely,

A handwritten signature in black ink, reading "Alan Hardwicke". The signature is written in a cursive style with a large, stylized "H".

Alan C. Hardwicke, MD
Internal Medicine, Chief of Staff
Ballinger Memorial Hospital District



La Esperanza Clinic, Inc.

The mission of La Esperanza Clinic is to provide quality primary and preventive health care and dental services to all people, particularly the medically underserved of San Angelo and the Pecos Valley.

May 17, 2020

Executive Commissioner Phil Wilson

cc: Victoria Ford, Acting Chief Operating Officer & Kristi Jordan, Director, Health Care Quality, Regulatory Services Division
Texas Health and Human Services Commission
Brown-Heatly Building
4900 North Lamar Blvd.
Austin, Texas 76711-3247

Re: Shannon Medical Center Certificate of Public Advantage (COPA)

Dear Executive Commissioner Phil Wilson,

I am writing to share my support for the acquisition of San Angelo Community Medical Center by Shannon Medical Center. As a physician with 38 years of experience here in San Angelo, I have seen firsthand some of the challenges that people of our community face as it relates to their health and wellbeing. I was an active member of the physician staff of both hospitals for many years as an orthopedic surgeon. I am currently involved in collaborations with both hospitals in my current role as chief medical officer for La Esperanza, Inc.

Growing up in San Angelo with a father who served for many years as an orthopedic surgeon, I have witnessed many changes in our local health care delivery system. We are blessed to have Shannon Medical Center and its incredible resources. These resources have always been guided to invest the interests of our local healthcare needs. As a non-profit, Shannon has continued to honor Mr. and Mrs. Shannon's will which continues to guide their financial decisions. The standard of care provided by Shannon and its staff and employees continues to be the best!

Many rural communities in our large shared 30+ county service area are facing difficult challenges, like the closure of hospitals and essential services—which lead to even steeper economic decline. We have an opportunity to overcome these challenges and put in place protections for our community, and are large service area communities including pricing and access, which are so important to those served in our community. By working together, local and area residents will benefit from more coordinated care and clinical integration across facilities and services in the community that will lead to improved outcomes and health. Were we to lose Community Hospital to financial demise, San Angelo and surrounding counties would be in trouble. Access to local healthcare would be unacceptable.

I believe our community will become stronger because Shannon will increase its investments in community health, continue to use its Community Health Needs Assessment to guide its



La Esperanza Clinic, Inc.

The mission of La Esperanza Clinic is to provide quality primary and preventive health care and dental services to all people, particularly the medically underserved of San Angelo and the Concho Valley.

investments and work closely with community partners like us to make an even greater impact on the health of our community.

I highly encourage you to approve this acquisition and preserve our access to the highest quality of care at the lowest cost in our region.

Sincerely,

Marc Wimpee MD

CMO

La Esperanza Clinic, Inc.



FAMILY HEALTH CENTER OF OZONA

An affiliate of Shannon Health System

May 14, 2020

Executive Commissioner Phil Wilson
cc: Victoria Ford, Acting Chief Operating Officer & Kristi Jordan, Director, Health Care Quality,
Regulatory Services Division
Texas Health and Human Services Commission
Brown-Heatly Building
4900 North Lamar Blvd.
Austin, Texas 76711-3247

Re: Shannon Medical Center Certificate of Public Advantage (COPA)

Dear Executive Commissioner Wilson.,

I'm writing to share my support for the acquisition of San Angelo Community Medical Center by Shannon West Texas Memorial Hospital.

Ozona resides in Crockett County, Texas and sits alongside Interstate 10. This area can be characterized as somewhat remote and rural. We are blessed to have a 24/7 clinic staffed by a physician and an advanced practice professional. Because of our remote location, we are often sending patients to the closest trauma center, which is located in San Angelo, Texas. We have a long history with Shannon and have partnered with them for over 20 years. Thus, I can only see the many positives that would come from Shannon and San Angelo Community Medical Center integrating as one. For example, we currently utilize EPIC as our medical record system thanks to our ongoing partnership with Shannon. This enables the coordination of care between us and Shannon and I only see these benefits extended by having the other hospital utilizing the same medical record system.

Many rural communities are facing difficult challenges, like the closure of hospitals and essential services—which lead to even steeper economic decline. Since 2010, 20 rural Texas hospitals have closed – more than any other state. Furthermore, 63 counties in Texas don't have a hospital at all. This acquisition ensures the residents of our region will continue to have access to the healthcare services they need for generations to come.

In order to have a strong, healthy workforce and economy, it is critically important that our city and county continue to have access to high quality care that leads to improved outcomes and health.

I encourage you to approve this acquisition and preserve our access to the highest-quality of care at the lowest cost in our region.

Sincerely,

Marcus Sims, DO

Medical Director

Family Health Center of Ozona

104 Avenue H.

Ozona, TX 76943

FAMILY HEALTH CENTER OF OZONA

104 North Avenue H, P.O. Box 907

Ozona, Texas 76943

915-392-3788 Fax: 915-392-5445

5/11/2020

Executive Commissioner Phil Wilson
cc: Victoria Ford, Acting Chief Operating Officer & Kristi Jordan, Director, Health Care Quality,
Regulatory Services Division
Texas Health and Human Services Commission
Brown-Heatly Building
4900 North Lamar Blvd.
Austin, Texas 76711-3247

Re: Shannon Medical Center Certificate of Public Advantage (COPA)

Dear Executive Commissioner Wilson,

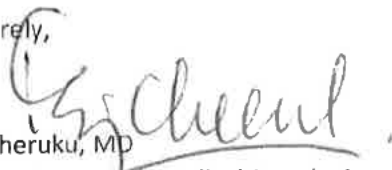
I've practiced as an oncologist and hematologist in San Angelo for more than 25 years. In my role, I've seen firsthand some of the significant challenges people in our community and region face as it relates to health and well-being. It is for this reason that I am writing to express my support for the proposed acquisition of San Angelo Community Medical Center by Shannon West Texas Memorial Hospital.

Shannon has the ability to make significant headway in addressing the health needs of our local population. As one organization, Shannon will be able to make an even bigger impact on some of the biggest health issues in our region including heart disease, diabetes and cancer – especially for some of Community's patients, who are traveling many hours for care because of insurance coverage. In addition, Shannon will be able to invest in new technology that will make healthcare more accessible to thousands of people living further out.

By coming together as one, Shannon and Community Medical Center can collaborate to implement the most effective practices, protocols and programs at each hospital, ultimately creating a stronger combined health system. By leveraging the best practices, the organizations will be able to elevate the standard of care locally. By working together, local residents will benefit from more coordinated care and clinical integration across facilities and services in the community.

I believe granting a COPA is an important opportunity to help preserve local healthcare for the patients in our region. I ask for your support.

Sincerely,


Raj Cheruku, MD
Hematologist and Medical Oncologist
Shannon Clinic

5/18/2020

Executive Commissioner Phil Wilson
cc: Victoria Ford, Acting Chief Operating Officer & Kristi Jordan, Director, Health Care Quality,
Regulatory Services Division
Texas Health and Human Services Commission
Brown-Heatly Building
4900 North Lamar Blvd.
Austin, Texas 76711-3247

Re: Shannon Medical Center Certificate of Public Advantage (COPA)

Dear Executive Commissioner Wilson,

We have lived in the rural community of Sonora, Texas, for twelve years; and, for over eight years we previously practiced hospital, emergency room, and clinic medicine in this local community. In this role, we have seen firsthand the significant challenges rural hospitals face in caring for the people in our region. It is for this reason that we are writing to express our support for the proposed acquisition of San Angelo Community Medical Center by Shannon West Texas Memorial Hospital.

Since 2010, twenty rural Texas hospitals have closed – more than any other state. Furthermore, sixty-three counties in Texas don't have a hospital at all. This acquisition ensures the residents of West Texas will continue to have access to the healthcare services they need for generations to come. Far too often, people in rural communities both in Texas and across the country experience poor health outcomes because care is more difficult to access and healthcare providers lack resources to invest in new technology. Our community, and the greater West Texas region, has been fortunate to have both San Angelo and Shannon, and it is important that they continue to have a robust healthcare system in the future.

By coming together as one, Shannon and Community Medical Center will collaborate to implement the most effective practices, protocols and programs at each hospital, ultimately creating a stronger combined health system. As part of the acquisition, Shannon will be able to invest in new technology, upgrades to Community's facility and expanding services. This is especially important because these two hospitals serve a very large region of people in West Texas, many of which drive hours for their care. By leveraging the best practices broadly across the board, the organizations will be able to elevate the standard of care locally. By working together, local residents will benefit from more coordinated care and clinical integration across facilities and services in the community. We believe this will reduce redundancy in care while also increasing cost efficiency and better outcomes of care for our patients. We are excited about what this means for the quality of, and access to, healthcare in our region. We encourage you to approve this acquisition and preserve our access to the highest-quality of care at the lowest cost in our region.

Sincerely,



Mark Edwards, MD
Medical Director of Urgent Care
Shannon Clinic



Kristy D. Edwards, MD
Family Medicine Physician
Shannon Clinic



COUNTY OF CROCKETT

May 11, 2020

Executive Commissioner Phil Wilson
cc: Victoria Ford, Acting Chief Operating Officer & Kristi Jordan, Director, Health Care Quality,
Regulatory Services Division
Texas Health and Human Services Commission
Brown-Heatly Building
4900 North Lamar Blvd.
Austin, Texas 76711-3247
Re: Shannon Medical Center Certificate of Public Advantage (COPA)

I'm writing to share my support for the acquisition of San Angelo Community Medical Center by Shannon West Texas Memorial Hospital.

Crockett County is located approximately one hour from San Angelo. We have a population of 3,499. Ozona is the largest town in Crockett County. Shannon currently partners with us in a clinic here locally. In some instances, our residents need a higher level of care. Thus, we frequently transfer patients from Ozona to San Angelo. We rely on having a strong health care system available in San Angelo to serve our residents.

Many rural communities are facing difficult challenges, like the closure of hospitals and essential services—which lead to even steeper economic decline. Since 2010, 20 rural Texas hospitals have closed – more than any other state. Furthermore, 63 counties in Texas don't have a hospital at all. This acquisition ensures the residents of our region will continue to have access to the healthcare services they need for generations to come.

In order to have a strong, healthy workforce and economy, it is critically important that our county continue to have access to high quality care that leads to improved outcomes and health.

I'm proud to support Shannon and the work the organization is doing to improve the health and quality of life for all those they serve in our region. I encourage you to approve this acquisition and preserve our access to the highest-quality of care at the lowest cost in our region.

Sincerely,

Judge Fred Deaton
Crockett County Texas
909 Avenue D.
P.O. Box 1857
Ozona, TX 76943



TRUSTEES OF SHANNON
WEST TEXAS MEMORIAL HOSPITAL

May 13, 2020

Executive Commissioner Phil Wilson

cc: Victoria Ford, Acting Chief Operating Officer & Kristi Jordan, Director, Health Care Quality, Regulatory Services Division

Texas Health and Human Services Commission

Brown-Heatly Building

4900 North Lamar Blvd.

Austin, Texas 76711-3247

Re: Shannon Medical Center Certificate of Public Advantage (COPA)

Dear Executive Commissioner Wilson,

I'm writing to share my support for the acquisition of San Angelo Community Medical Center by Shannon West Texas Memorial Hospital.

Across the country rural communities are desperate for access to high-quality healthcare. Rural hospitals nationwide continue to face significant financial challenges which have been compounded by the recent COVID-19 pandemic. In Texas we have seen a rash of rural hospital closures. Since 2010 twenty rural Texas hospitals have closed – more than any state. And furthermore 63 counties in Texas do not have a hospital at all. This acquisition ensures our region will continue to have access to quality healthcare services.

I'm proud to be affiliated with Shannon and the work the organization is doing to improve the health and quality of life for west Texans. Within the last few years, Shannon was ranked by Nerdwallet as the most affordable hospital in the state.

As a combined organization, Shannon will be able to make more significant impacts on many health issues in our region including heart disease, diabetes and cancer. This is especially significant for our regional patients who travel many hours for care. This combination enables Shannon to invest more in technology and equipment to benefit our residents. Shannon is uniquely positioned to increase employment of the local workforce. This aspect has become increasingly important in light of the current economic climate across the United States and throughout Texas. In the future there are opportunities to do even more. I am encouraged about what this means for the quality of, and access to, healthcare in our region. Shannon has the ability to make significant headway in addressing the health needs of our local population; and I'm inspired by Shannon's vision to shape the future of healthcare here in the region.

I encourage you to approve this acquisition and preserve our access to the highest-quality of care at the lowest cost in our region.

Sincerely,

Len P. Mertz
Managing Trustee

OFFICES: 36 WEST BEAUREGARD, SUITE 700
P.O. BOX 49
SAN ANGELO, TEXAS 76902
325-655-8974
FAX: 325-659-4666

TOM GREEN COUNTY



Commissioner, Precinct 3

Rick Bacon

111 West Beauregard

San Angelo, TX 76903

325-659-6513 Cell: 325-234-4261

Email: rick.bacon@co.tom-green.tx.us

May 13, 2020

Executive Commissioner Phil Wilson

cc: Victoria Ford, Acting Chief Operating Officer & Kristi Jordan, Director, Health Care Quality, Regulatory Services Division

Texas Health and Human Services Commission

Brown-Heatly Building

4900 North Lamar Blvd.

Austin, Texas 76711-3247

Re: Shannon Medical Center Certificate of Public Advantage (COPA)

Dear Executive Commissioner Phil Wilson,

I am writing to ask you to grant a COPA to Shannon West Texas Memorial Hospital, allowing it to move forward with the acquisition of San Angelo Community Medical Center. I understand the impact of healthcare on a community like ours. Across the country, rural communities are desperate for access to high-quality healthcare. Since 2010, 20 rural Texas hospitals have closed – more than any other state. Furthermore, 63 counties in Texas do not have a hospital at all. This acquisition ensures the residents of West Texas will continue to have access to the healthcare services they need for generations to come.

As one organization, Shannon will be able to make an even bigger impact on some of the biggest health issues in our region including heart disease, diabetes and cancer – especially for some of Community's cancer patients, who are traveling many hours for care. Additionally, this move enables Shannon to invest more into new technology and equipment locally to benefit even more residents. Shannon is uniquely positioned to invest in the local workforce, which has become increasingly important in light of the current economic climate across the United States and throughout Texas.

Looking forward, there is an opportunity to do even more. I am encouraged about what this means for the quality of, and access to, healthcare in our region. Shannon has the ability to make significant headway in addressing the health needs of our local population and I am inspired to see how Shannon's vision will shape the future of healthcare in West Texas.

I am proud to support Shannon and the work the organization is doing to improve the health and quality of life for all who call San Angelo home. I encourage you to approve this acquisition and preserve our access to the highest quality of care at the lowest cost in our region.

Sincerely,

A handwritten signature in blue ink that reads "Rick Bacon".

05/13/2020

Executive Commissioner Phil Wilson
cc: Victoria Ford, Acting Chief Operating Officer & Kristi Jordan, Director, Health Care Quality,
Regulatory Services Division
Texas Health and Human Services Commission
Brown-Heatly Building
4900 North Lamar Blvd
Austin, Texas 76711-3247

Re: Shannon Medical Center Certificate of Public Advantage (COPA)

Dear Executive Commissioner Phil Wilson,

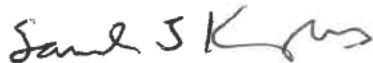
I am writing to share my support for the acquisition of San Angelo Community Medical Center by Shannon Medical Center. As a physician with 27 years of experience in wound care and emergency medicine, I have seen firsthand some of the challenges that people of our community face as it relates to their health and wellbeing.

Oftentimes, people in rural communities in both Texas and across the country continue to face challenges created by limited access to healthcare services, the shortage of health professionals and the toll of chronic disease. Shannon has the ability to make significant headway in addressing the health needs of our local population. As one organization, Shannon will have the ability to make a greater impact on some of the most pressing health issues in our region. In addition, this acquisition will provide the opportunity to invest in new technology that will have a lasting impact on the health and quality of life of the community.

By coming together as one, Shannon and Community Medical Center will collaborate to implement the most effective practices, protocols and programs at each hospital, ultimately creating a stronger combined health system. By leveraging the best practices, the organizations will be able to elevate the standard of care locally. By working together, local residents will benefit from more coordinated care and clinical integration across facilities and services in the community that will lead to improved outcomes and health.

I encourage you to approve this acquisition and preserve our access to the highest-quality of care at the lowest cost in our region.

Sincerely,

A handwritten signature in dark ink, appearing to read "Samuel J. Kasberg". The signature is fluid and cursive, with a stylized "S" and "K".

Samuel J. Kasberg, M.D., FACEP
Medical Director
Wound Care and Hyperbaric Services
San Angelo Community Medical Center



HEART OF TEXAS HEALTHCARE SYSTEM

May 15, 2020

Executive Commissioner Phil Wilson

cc: Victoria Ford, Acting Chief Operating Officer & Kristi Jordan, Director, Health Care Quality,
Regulatory Services Division
Texas Health and Human Services Commission
Brown-Heatly Building
4900 North Lamar Blvd.
Austin, Texas 76711-3247

Re: Shannon Medical Center Certificate of Public Advantage (COPA)

Dear Executive Commissioner Phil Wilson,

The Board of Directors of the Heart of Texas Healthcare System supports the acquisition of San Angelo Community Medical Center by Shannon Medical Center. As the CEO in Brady for over 16 years I have seen firsthand some of the challenges that people of our community encounter receiving high quality healthcare close to home. By joining organizations, patient access will be improved and the integration of services and resources will lead to more effective coordination of care. The merger will improve the opportunities to strengthen specialty care in the areas of heart disease, diabetes, and cancer which is the region's most significant healthcare concerns. As part of the acquisition, Shannon will be able to invest in new technology, upgrade Community's facilities, and continue a strong workforce in the healthcare fields.

It is for these reasons that we support the acquisition by Shannon Medical Center. We believe this will put in place protections for the regions healthcare future in a very uncertain climate.

Sincerely,

Tim Jones

CEO/Board Member

Heart of Texas Healthcare System



FOR YOUTH DEVELOPMENT
FOR HEALTHY LIVING
FOR SOCIAL RESPONSIBILITY

May 12, 2020

Texas Health and Human Services Commission
Brown-Heatly Building
4900 North Lamar Blvd.
Austin, Texas 76711-3247

Re: Shannon Medical Center Certificate of Public Advantage (COPA)

Dear Executive Commissioner Phil Wilson,

I'm writing to ask you to grant a COPA to Shannon West Texas Memorial Hospital, allowing it to move forward with the acquisition of San Angelo Community Medical Center.

As CEO of the YMCA of San Angelo I understand the impact of healthcare on a community like ours. The Y has had a longtime relationship with Shannon Medical Center staff and patients. Through this relationship we have been able to provide health related services to patients by way of doctor referral and aid in the creation of wellness programs that benefit Shannon Medical staff and faculty. The integration of resources will create opportunity for more patients and staff. Together we can do so much more!

By coming together as one, Shannon and Community Medical Center will collaborate to implement the most effective practices, protocols and programs at each hospital, ultimately creating a stronger combined health system. In order to have a strong, healthy workforce and economy, it is critically important that our community continue to have access to high quality care that leads to improved outcomes and health.

Through this acquisition, our region's healthcare will be overseen by a group of local, highly invested community board members who will ensure our provider are supported and our community gets the care it needs.

I am proud to support Shannon and the work the organization is doing to improve the health and quality of life for all who call San Angelo home. I encourage you to approve this acquisition and preserve our access to the highest-quality of care at the lowest cost in our region.

Sincerely,

AJ Moore
CEO
YMCA of San Angelo

May 11, 2020



ANGELO STATE UNIVERSITY

Office of the President

Executive Commissioner Phil Wilson
cc: Victoria Ford, Acting Chief Operating Officer &
Kristi Jordan, Director, Health Care Quality, Regulatory Services Division
Texas Health and Human Services Commission
Brown-Heatly Building
4900 North Lamar Blvd.
Austin, Texas 76711-3247

Re: Shannon Medical Center Certificate of Public Advantage (COPA)

Dear Executive Commissioner Wilson,

On behalf of Angelo State University in San Angelo, Texas, I would like to express my support for Shannon Medical and San Angelo Community Medical Center's joint application for a Certificate of Public Advantage from the Texas Health and Human Services. In joining together as one, Shannon and Community Medical Center will implement the most effective practices, enhancing availability and quality of healthcare for the various communities served.

Angelo State University has had great experiences partnering with both Shannon and Community Medical Center through our on-campus clinics for sports medicine, women's health and general student health. Providing strong healthcare resources at Angelo State University and in our community is important for recruiting future faculty, staff and students. We are confident that the merger will benefit our employees, residents and students through more coordinated care and clinical integration across all facilities and services in San Angelo.

As one organization, Shannon will have increased ability to support education, training and placement of future healthcare workers. Angelo State University's Archer College for Health and Human Services produces hundreds of healthcare graduates each year. With a strong local health system to gain experience from during their quest for a degree, our graduates will have even greater capacity to succeed and serve.

Thank you for including Angelo State University in your consideration of elevating healthcare in the Concho Valley.

Sincerely,

Angie Wright
Interim President
Angelo State University

cc: Victoria Ford
Kristi Jordan



www.p-led.com
(325) 227-4577
3490 Venture Drive, San Angelo, Texas 76905
info@p-led.com

Memo

To: Phil Wilson, Executive Commissioner
cc: Victoria Ford, Acting Chief Operating Officer
Kristi Jordan, Director, Health Care Quality, Regulatory Services Division
*Texas Health and Human Services Commission
Brown-Heatly Building
4900 North Lamar Blvd.
Austin, Texas 76711-3247*
From: J. Bryan Vincent, Ph.D., *Managing Partner*
Date: 5/13/2020
Re: Shannon Medical Center Certificate of Public Advantage (COPA)

My name is J. Bryan Vincent and I am the CEO of Principal Lighting Group headquartered in San Angelo, TX. We are the largest provider of electrical components to the illuminated sign industry in North America. Our company has over 100 employees and we depend upon high quality medical care in San Angelo. Best-in-class health care not only allows us to have a healthy workforce but helps our company recruit talent nationally. I am writing to express my support for the recent acquisition of San Angelo Community Medical Center by Shannon West Texas Memorial Hospital.

As a long-time San Angeloan, I have had the pleasure of knowing many members of the board of directors and executive management team at Shannon. What I can say unequivocally is that Shane Plymell and the entire Shannon leadership are of the highest integrity and committed to providing the best patient care at the lowest cost to deliver. This team is truly vested in our community. In addition to pricing protections not in place today, this acquisition will certainly lead to additional investments that will make an even greater impact on our community and the surrounding area.

Shannon is a shining star in our community and is a critical piece to making San Angelo a healthy and desirable community to work and live. I encourage you to approve this acquisition without reservation.

Best Regards,

J. Bryan Vincent, Ph.D., CEO



May 12, 2020

Executive Commissioner Phil Wilson
cc: Victoria Ford, Acting Chief Operating Officer & Kristi Jordan, Director, Health Care Quality,
Regulatory Services Division
Texas Health and Human Services Commission
Brown-Heatly Building
4900 North Lamar Blvd.
Austin, Texas 76711-3247

Re: Shannon Medical Center Certificate of Public Advantage (COPA)

I've been a Physician in San Angelo for the past 22 years. In my role, I've seen firsthand some of the significant challenges people in our community and region face as it relates to health and well-being. In order to have a strong, healthy workforce and economy, it is critically important that our community continue to have access to high quality care that leads to improved outcomes and health.

It is for this reason that I am writing to express my support for the proposed acquisition of San Angelo Community Medical Center by Shannon West Texas Memorial Hospital.

Far too often, people in rural communities both in Texas and across the country experience poor health outcomes because care is more difficult to access and healthcare providers lack resources to invest in new technology. Our community, and the greater West Texas region, has been fortunate to have both San Angelo Community Medical Center and Shannon, and it is important that they continue to have a robust healthcare system in the future.

Through this acquisition, our community will have pricing protections not in place today, and San Angelo Community Medical Center will be overseen by a group of local, highly invested community board members who will ensure our providers are supported and our community gets the care it needs. In addition, Shannon will be able to invest in new technology that will make healthcare more accessible to thousands of people living further out.

I believe granting a COPA is a once in a generation opportunity as it will help us avoid the fate of many other closed rural community hospitals and leave us stronger than ever. I encourage your support.

Warmest regards,

Chris Barnett, MD
Chief Medical Officer
Shannon Medical Center
120 East Harris Avenue
San Angelo, TX 76903



May 13, 2020

Executive Commissioner Phil Wilson

cc: Victoria Ford, Acting Chief Operating Officer & Kristi Jordan, Director, Health Care Quality, Regulatory Services Division

Texas Health and Human Services Commission

Brown-Heatly Building

4900 North Lamar Blvd.

Austin, Texas 76711-3247

Re: Shannon Medical Center Certificate of Public Advantage (COPA)

Dear Executive Commissioner Phil Wilson,

I'm writing to ask you to grant a COPA to Shannon West Texas Memorial Hospital, allowing it to move forward with the acquisition of San Angelo Community Medical Center. We are expressing our support because we believe a strong and robust healthcare system is essential to our community's success.

West Texas Counseling & Guidance (WTCG) is a nonprofit counseling center that provides professional counseling on a sliding scale that starts at \$0. WTCG has recently partnered with Shannon Hospital to provide outpatient suicide prevention services through the Zero Suicide program. Shannon Hospital has always been a great partner and willing to collaborate in order to serve the community.

We believe our community will be stronger because Shannon will increase its investments in community health, continue to use its Community Health Needs Assessment to develop community strategies and work closely with community partners like us to make an even greater impact on the health of our community. By leveraging the best practices, the organizations will be able to elevate the standard of healthcare locally. By working together, local residents will benefit from more coordinated care and clinical integration across facilities and services in the community.

I encourage you to grant Shannon a Certificate of Public Advantage as they continue to work towards improving the health and quality of life for our community and region.

Respectfully,

A handwritten signature in blue ink, appearing to read 'Dusty McCoy, LPC-S', is written over a blue horizontal line.

Dusty McCoy, LPC-S
Executive Director

5/13/2020

Executive Commissioner Phil Wilson
cc: Victoria Ford, Acting Chief Operating Officer & Kristi Jordan, Director, Health Care Quality,
Regulatory Services Division
Texas Health and Human Services Commission
Brown-Heatly Building
4900 North Lamar Blvd.
Austin, Texas 76711-3247

Re: Shannon Medical Center Certificate of Public Advantage (COPA)

Dear Executive Commissioner Wilson,

I'm writing to ask you to grant a COPA to Shannon Medical Center, allowing it to move forward with the acquisition of San Angelo Community Medical Center.

As President and CEO of Foster Communications Co, Inc. and media partner in the Children's Miracle Network effort since its inception in San Angelo, I understand the impact of healthcare on a community like ours.

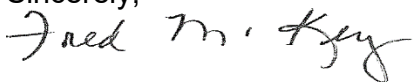
By coming together as one, Shannon and Community Medical Center will collaborate to implement the most effective practices, protocols and programs at each hospital, ultimately creating a stronger combined health system. By leveraging the best practices that have led to Shannon's 5-star rating from CMS, a top cardiovascular program and multiple awards for quality, the organizations will be able to elevate the standard of care locally. By working together, local residents will benefit from more coordinated care and clinical integration across facilities and services in the community.

Additionally, this move enables Shannon to invest more into new technology and equipment locally to benefit even more residents. Shannon is also uniquely positioned to invest in the local workforce, which has become increasingly important in light of the current economic climate across the United States and throughout Texas.

Looking forward, there's an opportunity to do even more. I am encouraged about what this means for the quality of, and access to, healthcare in our region. Shannon has the ability to make significant headway in addressing the health needs of our local population and I'm inspired by Shannon's vision to shape the future of healthcare here in West Texas.

I'm proud to support Shannon and the work the organization is doing to improve the health and quality of life for all who call San Angelo home. I encourage you to approve this acquisition and preserve our access to the highest-quality of care at the lowest cost in our region.

Sincerely,



Fred M. Key
President/CEO
Foster Communications Co., Inc.

Jason Felger, MD
Shannon Clinic Thoracic and Cardiovascular Surgery
PO Box 1979
San Angelo TX 76902

May 13, 2020

Executive Commissioner Phil Wilson
cc: Victoria Ford, Acting Chief Operating Officer & Kristi Jordan, Director, Health Care Quality,
Regulatory Services Division
Texas Health and Human Services Commission
Brown-Heatly Building
4900 North Lamar Blvd.
Austin, Texas 76711-3247

Re: Shannon Medical Center Certificate of Public Advantage (COPA)

Dear Executive Commissioner Wilson,

I have been a Thoracic and Cardiovascular surgeon in San Angelo, Texas for the past 16 years. In my role, I have seen the significant health challenges people in our community and region face. Access to high quality health care is a fundamental necessity for a community to have a strong, healthy workforce and vibrant economy. High quality care leads to improved outcomes and overall lesser healthcare costs. The proposed acquisition of San Angelo Community Medical Center by Shannon West Texas Memorial Hospital will promote the maintenance and persistence of consistent high quality health care in this underserved region of West Texas.

People in rural communities, both in Texas and across the country, experience poor health outcomes because access to healthcare is poor. Furthermore, healthcare providers in rural areas lack resources to invest in new technologies and advancements in medicine. Through my 16 years in San Angelo, I have worked at both San Angelo Community Medical Center and Shannon West Texas Memorial Hospital. The medical professionals are highly trained and aggressively provide robust healthcare. I currently am affiliated with Shannon Medical Center.

Through the last 16 years, Shannon has provided quality cardiovascular care. Shannon was named "IBM Watson Top 50 Hospitals" in the US, one of three in the state of Texas. Our Transcatheter Aortic Valve Replacement (TAVR) program is the first in the region. The cardiovascular team initiated a CMS "rules change" to allow medium-size hospitals to perform TAVR so underserved areas of Texas have access to this life-saving modality. These cardiovascular advancements and others in public health, orthopedics, neurosurgery and vascular surgery would not have occurred without the commitment from a local and highly invested community board. This board responds to the needs of the community to provide capital investment in physical infrastructure and medical equipment in order to advance medical care locally and the surrounding region.

Through this acquisition, the people of our community will have pricing protections that are not in place today. The community board will oversee San Angelo Community Medical Center and ensure healthcare providers are supported. Shannon will continue to invest in new technology and infrastructure to make healthcare more accessible to the growing region. High quality, high value care will continue to be our highest goal.

Granting Shannon West Texas Memorial Hospital a Certificate of Public Advantage will help avoid the fate of many other closed rural community hospitals. The COPA will preserve and promote access to high quality care in the region. I encourage your support.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Felger", is written over a horizontal line. The signature is stylized and cursive.

Jason E. Felger, M.D.

Thoracic and Cardiovascular Surgery

Shannon West Texas Memorial Hospital

CITIZENS STATE BANK

P.O. BOX 1510
SAN ANGELO, TEXAS 76902
(325) 657-0099 TOLL 866-786-7741
FAX (325) 657-0939

September 21, 2020

Dear Executive Commissioner Phil Wilson,

I am writing to ask you to grant a COPA to Shannon West Texas Memorial Hospital, allowing it to move forward with the acquisition of San Angelo Community Medical Center.

As President and CEO of Citizens State Bank, I understand the impact of healthcare on a community like ours. It is of high priority that quality medical care for our community continues in an exemplary manner. Many of the residents in the Concho Valley rely on the high quality of health care provided by Shannon.

Shannon has been a part of our community for many years, they are active in the region and they are trusted by many for their care. I believe it is critically important that we do everything possible to ensure we maintain a board range of high-quality healthcare services in our community. After watching numerous rural hospitals close their doors both in Texas and across the country, I believe this acquisition offers the best opportunity to maintain vital healthcare services.

In order to have a strong, healthy workforce and economy, it is critically important that our community continue to have access to high quality care that leads to improved outcomes and health. I am proud to support Shannon and the work the organization is doing to improve the health and quality of life for all who call San Angelo home. I encourage you to approve this acquisition and preserve our access to the highest quality of care at the lowest cost in our region. Your attention with this topic is greatly appreciated and thank you for your time.

Sincerely,



Dean Feathers
President/CEO
Citizens State Bank
325-657-0099



September 18, 2020

I am writing to ask you to grant a COPA to Shannon West Texas Memorial Hospital, allowing it to move forward with the acquisition of San Angelo Community Medical Center.

As Executive Director of Village East Inc., I understand the impact of healthcare on a community like San Angelo. With 106 retirement homes in the Village East community, I represent 156 senior citizens who rely on affordable, convenient health care.

Shannon has been a part of our community for many years, they are active in the region and they are trusted by many for their care. I believe it is critically important that we do everything possible to ensure we maintain a broad range of high-quality healthcare services in our community. After watching numerous rural hospitals close their doors both in Texas and across the country, I believe this acquisition offers the best opportunity to maintain vital healthcare services in our community.

In order to have a strong, healthy workforce and economy, it is critically important that our community continue to have access to high quality care that leads to improved outcomes and health. I am proud to support Shannon and the work the organization is doing to improve the health and quality of life for all who call San Angelo home. I encourage you to approve this acquisition and preserve our access to the highest quality of care at the lowest cost in our region.

Sincerely,

A handwritten signature in dark ink, appearing to read "Mark A. Davis". The signature is fluid and cursive, with a large initial "M" and a stylized "A".

Mark A. Davis
Executive Director,
Village East Retirement Community

A Christian Retirement Community

4054 Sul Ross St. San Angelo, Texas 76904 325-944-0819 FAX 325-949-3383



September 21, 2020

Executive Commissioner Phil Wilson
Cc: Victoria Ford, Acting Chief Operating Officer & Kristi Jordan, Director, Health Care Quality,
Regulatory Services Division
Texas Health and Human Service Commission
4900 North Lamar Blvd.
Austin, Texas 78711-3247

Re: Shannon Medical Center Certificate of Public Advantage (COPA)

Dear Executive Commission Phil Wilson, ,

My name is Wrey Montgomery and I am the President and Chief Executive Officer of The City National Bank domiciled in Colorado City, Texas. I have lived in San Angelo, Texas since 1992. I am writing in reference to the request for approval of the COPA that Shannon Health Systems has made in order to purchase San Angelo Community Medical Center. I am in full support of the transaction being completed and am excited about the positive impact it will have on our community and region going forward. Shannon is the trusted healthcare provider for San Angelo and the Concho Valley and I see no reason for this acquisition to change my trust in them going forward.

Thank you for your time and consideration in this very important matter.

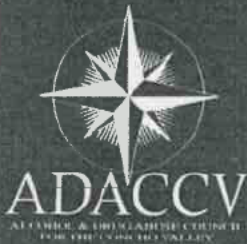
Sincerely,



Wrey Montgomery

President/CEO
The City National Bank of Colorado City

/wwm



The mission of the Alcohol & Drug Abuse Council for the Concho Valley
is to save lives and create healthier communities

Eric A. Sanchez, Chief Executive Officer

June 11, 2020

Executive Commissioner Phil Wilson

cc: Victoria Ford, Acting Chief Operating Officer & Kristi Jordan, Director, Health Care Quality,
Regulatory Services Division

Texas Health and Human Services Commission

Brown-Heatly Building

4900 North Lamar Blvd.

Austin, Texas 76711-3247

Re: Shannon Medical Center Certificate of Public Advantage (COPA)

Dear Executive Commissioner Phil Wilson,

I'm writing to ask you to grant a Certificate of Public Advantage (COPA) from Texas Health and Human Services Commission to Shannon West Texas Memorial Hospital, allowing it to move forward with the acquisition of San Angelo Community Medical Center.

As CEO of the Alcohol & Drug Abuse Council for the Concho Valley, I understand the impact of healthcare on the Concho Valley.

The Alcohol & Drug Abuse Council for the Concho Valley (ADACCV) is licensed by the Texas Health and Human Services Commission to provide substance use prevention services for youth and adults and substance use disorder treatment, including detox beginning September 1, 2020, for adult males and females at our new facility, the Journey Recovery Center. The agency is celebrating its 60th anniversary this year! ADACCV's target population includes the indigent, homeless, jobless, uninsured and underinsured adult males and females who may otherwise be unable to access substance use disorder treatment through private or personal means.

I am expressing support of the COPA because I believe a strong and robust healthcare system is essential to our community's success. Without the services these health systems provide, our community and those we serve would experience challenges such as:

- An increase in untreated drug and alcohol related illnesses such as cirrhosis and cardiovascular diseases.
- A decrease in referrals to life saving programs such as the Alcohol & Drug Abuse Council for the Concho Valley.

3553 Houston Harle • P.O. Box 3805 • San Angelo, TX 76902

P: (325) 224-3481 • F: (325) 224-4923

24 Hour Crisis Hotline: (800) 880-9641

www.adaccv.org • www.facebook.com/adaccv • www.twitter.com/adaccv

EIDN 75-1609328



Shannon Medical Center Support Letter Continued

- An increase in deaths due to drug overdoses not treated in a timely manner.
- A decrease in mandated professional reports to Child Protective Services for suspected child abuse or neglect.



I am proud to support Shannon and the work the organization is doing to improve the health and quality of life for all who call San Angelo home. I encourage you to approve this acquisition and preserve our access to the highest-quality of care at the lowest cost in our region.

Sincerely,

A handwritten signature in black ink, appearing to read 'ES', with a stylized flourish at the end.

Eric Sanchez, CEO

Steve Montoya, Jr. MD



June 4, 2020

Governor Greg Abbot
110 San Jacinto
Austin, Texas 78711

Attorney General Ken Paxton, Jr.
300 West 15th Street
Austin, TX 78701

Commissioner Robert Vaughn
Office of HHS
125 E. 11th Street
Austin, Texas 78701

VIA Fax: 512-475-2994 and CMRRR

VIA Fax: 512-424-6500 and CMRRR

In Re: Shannon Medical Center and/or San Angelo Community Medical Center Request for
Civil Investigative Demand under Texas Health & Safety Code § 314A.201

Open Letter-

Dear Governor Abbot, Attorney General Paxton, and Commissioner Vaughn:

You say you believe in free enterprise and competition to have the best health care service to individuals and for economic growth in Texas. You need to ask these questions at a hearing publicly to let the citizens be informed and to prove if this "merger" is really the best thing for the patients in San Angelo and Tom Green County. The patients are who are to benefit or be harmed deserve the answers to the questions. The way this is presented in the application only Shannon benefits.

Pursuant to Texas Health & Safety Code § 314A.20 I am requesting the Attorney General, using its authority under the statute to have a hearing in San Angelo to force the two hospitals to answer the following questions. Remember under the statute the hospitals have to answer the question of “the extent of any reduction in competition among physicians, allied health professionals, other health care providers or other persons providing goods or services to, or in competition with, hospitals.” In the application the questions set out above and the following have not been answered in detail. Only generalizations are in the application. Generalizations are not proof.

Questions to be answered-

1. Why will Shannon not guarantee medical staff privileges to all the physicians that have privileges at San Angelo Community currently. The only thing Shannon has done is to say after the asset purchase a doctor can apply. With the guarantee of immunity by the statute after approval all doctors can be denied privileges to practice. **If the doctors are qualified to practice now then why not guarantee privileges. This is not done to stop competition.**

Shannon has contacted two anesthesiologists, doctors they need on staff at Shannon, and said they will have staff privileges. So, all the other doctors are just hoping they get privileges. If the privileges are denied using the immunity provisions of this statute then the doctors can do nothing but move away because without staff privileges then they have no where to care for their patients. **Thus, competition ends and prices go up in health care.**

2. Why is Shannon only buying assets? Shannon is buying the hospital building and all separate leases of surgical centers so no doctor who is denied privileges to Shannon after the asset purchase will have no way to even compete at a private surgery center.
3. The application only uses the nebulous terms of economy of scale to “explain in detail how the proposed merger outweighs and disadvantage”. The statute asks for detail and as question 1 and 2 show this needs to be answered in detail IN A PUBLIC HEARING on how patients and competition are not hurt by this asset purchase AND REMOVAL OF ALL COMPETITION IN HEALTHCARE SERVICES.
4. Why will this merger not hurt patients that have HMO's? In particular one of the largest HMO's in Texas is Blue Cross Blue Shield. There are a large number of patients in San Angelo and Tom Green County with this coverage. Only San Angelo Community takes this insurance. Shannon has not said in its application that it will take all the insurance that San Angelo Community takes and it does not currently. You need to ask what happens to all these patients that are then forced to go to Shannon and pay out of network charges. Patients in San Angelo will be forced to go to Abilene which is 90 miles to get

care if they do not have the right insurance. The out of network charges are the responsibility of the patient. The statute asks can health care payors negotiate payment. The answer already is no since they will not take health insurance San Angelo Community takes. Get an answer on the record in the public hearing.

5. If Shannon has, as is stated in its application, a great need for beds then why have they in the last 60 days been firing/laying off permanently hospital staff. During the virus the hospital should even have more need for staff. This proves that the merger is just to control all healthcare services then price.
6. Referencing 5 above will it not cut the number of acute care beds in Tom Green County? The answer is Yes. So, Shannon will have price and acceptance of insurance control. The acute care beds situation is a key question in the statute that needs to be answered in the public hearing. Why will the doctors who treat acute care patients at San Angelo Community not be allowed to continue to provide acute care treatment.
7. Patients/the public have doctors in San Angelo who practice at San Angelo Community who will be forced to go to Shannon for a doctor and start a new doctor patient relationship or to Abilene which is 90 miles. If this is not a burden and harmful to individuals then what is? What happened to the patient having a choice of their doctor?
8. In the application Shannon has failed to prove that the economic data showing no harm is not a lie using numbers. No exact analysis has been done. Shannon is just using the statute to say the State must approve this in the 120 days. A copy of all the filings by Shannon Medical Center do not answer the questions concerning the application of public advantage. **YOU NEED TO HOLD A PUBLIC HEARING IN SAN ANGELO TO ANSWER THE QUESTIONS. MAKE A RECORD OF THE HEARING.**
9. Ask Shannon the question if the doctors, who all have qualified credentials, are not given privileges and the HMO's are not taken for payment which of the Patients are given better care at a lower price. The answer is NONE. **ASK THIS ON THE RECORD IN A PUBLIC HEARING.** How is cutting medical staff and competition beneficial to allow for lower prices AND BETTER PATIENT CARE?

10. Just on December 5, 2019 the Third District Court of Appeals in Austin ruled in Shannon Medical Center v. Triad Holdings Cause No. 14-1800638-CV showed that competition is needed. San Angelo Community is also a party to the case. This asset purchase makes this loss by Shannon go away. This needs to be asked about in the public hearing about competition not being compromised.

11. HOW IS THIS AN ASSET PURCHASE BEFENFICIAL FOR SAN ANGELO?

The Attorney General needs to hold a hearing to get on the record by Shannon an answer to the questions. If Shannon will not answer these simple questions IN A STRAIGHT FORWARD MANNER in public in San Angelo on the record – THEN WHAT ARE THEY HIDING?

Texas has a statute of government in the sunshine- make the sun shine on this merger.

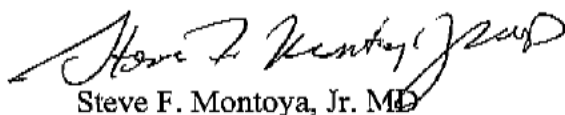
The application does not prove that the merger/asset purchase is beneficial to the patients. The only one who will benefit is Shannon by being a legal monopoly controlling prices and who can practice medicine in San Angelo, Texas.

Thank you for your assistance. I request a response in writing.

Finally, when I requested the rules for these mergers nothing was finalized-

THAT PROVES WHAT IS HAPPENING ON THIS APPLICATION IS IT IS JUST BEING PUT THROUGH WITHOUT ANY GOVERNMENT OVER SIGHT.

Sincerely,



Steve F. Montoya, Jr. MD

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September 22, 2020

Attorney General Ken Paxton, Jr.
300 West 15th Street
Austin, TX 78701

Commissioner Young
Office of HHS
125 E. 11th Street
Austin, Texas 78701

VIA Fax: 512-475-2994 and CMRRR

Fax: 512-424-6500 and CMRRR

Dear General Paxton and Commissioner Young:

On September 10th Signatures were sent requesting a hearing on the merger of on the Shannon Hospital and San Angelo Community Medical Center application for Certificate of Public Authority. No response to that request has been given.

Pursuant to Texas Health and Safety Code Chapter 314A § 201 the Attorney General has authority for a hearing on the determination of the Certificate of Public Authority.

Pursuant to Texas Government Code § 2001.029 if at least 25 persons request a hearing then the agency, in this case the Attorney General's Office, shall grant the hearing.

Attached is the petition with 35 signatures of citizens of the State of Texas requesting a hearing that was originally sent and additional electronic petition with 130 more signatures and comments. Please read the comments because the signers ask heart felt questions that need to be answered in a public hearing. If the statute is to mean anything than the public forum should be held.

We are respectfully asking the hearing to be in San Angelo, Texas since the hospitals asking for the Certificate of Public Authority are located in San Angelo, Texas. Please let me know of the date and time of the hearing so the individuals can attend. We would request that notice be given in the San Angelo Live website which is the San Angelo Texas community website for news and communication to the citizens and that notice be given to the local Fox Channel KIDY, ABC Channel KTXS, CBS Channel KLST and the local radio stations.

The hearing gives the fairness to the citizens to be heard even if the ruling is to allow the merger. Please give a response to the petitions.

Very truly yours,
/s/Craig Laird
Craig Laird