



11-03-2016 10:04:10 AM

**Legacy Health**  
1919 N.W. Lovejoy St.  
Portland, OR 97209  
503.415.5600 phone  
503.415.5777 fax

November 4, 2016

Jana Fussell  
Program Coordinator  
Certificate of Need Program  
OHA-Public Health Division  
800 NE Oregon Street  
Portland, Oregon 97232

Dear Ms. Fussell:

Per OAR 333 545-0020(4), Legacy Health (Legacy) requests that it be recognized by the Division as an affected party to the certificate of need application submitted by NEWCO Oregon Inc. (Universal Health Services) proposing to establish a new free standing psychiatric hospital in Wilsonville. The information below demonstrates that Legacy holds a public interest in the results of the review process, and therefore, by definition is an affected party.

Legacy Health is a nonprofit, locally owned organization based in Portland, Oregon. We serve the Portland metro area, including Wilsonville and surrounding communities in the Mid-Willamette Valley. Legacy Health provides a full range of inpatient and outpatient services including behavioral health services for all ages. On any given day, Legacy has nearly 45 inpatients with a behavioral health diagnosis; the majority of which are Medicaid or self-pay. Our outpatient census exceeds dozens per day. Importantly, Legacy Health is a partner in the development of Unity Center for Behavioral Health (Unity); scheduled to open in early 2017. Unity will be a national model for providing compassionate mental health care in times of crisis. Through an unprecedented collaboration between Adventist Health, Kaiser Permanente, Legacy Health and Oregon Health & Science University, Unity has set a goal of providing care for all those in need through a combination of emergency, inpatient and outpatient services.

The inpatient program will include 102 inpatient beds (22 child and adolescent and 80 adult), and received a determination from the CN Program in April of 2015 that no prior CN review or approval was required. Unity will provide a dedicated psychiatric emergency room to reduce ED boarding which we believe will also reduce the number of people who need to be admitted to inpatient beds for acute mental health needs. In addition, when Unity opens in early 2017, there will be a gain of six inpatient beds for adolescents. Unity is a true community partnership.

Legacy Health believes that this letter provides sufficient evidence that it qualifies for affected party status and we request to be informed of the outcome of the Division's proceedings related to this application.

Please do not hesitate contact me if you have any questions or require further information.

Sincerely,

A handwritten signature in black ink, appearing to read "Tony Melaragno", followed by a horizontal line extending to the right.

Tony Melaragno, MD  
Vice President  
Behavioral Health and Oncology  
Legacy Health System  
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