

Name	Name of Organization	Comments
RODERICK SCOTT REECE	RESIDENT	This buy out has to be stopped. This will eliminate the health option for care in the wabash valley. Leaving the worst health care organization as the only alternative for residents. Union has the worst reviews on line. The level of care and the customer service is deplorable. Residents should not be left with NO CHOICE! How can we allow the monopoly of our health care?
Angie Gifford	N/A	I am one of many people who left the Union Health Group due to negative customer service occasioned by upper administration. I was not unhappy when my family doctor left, but the lack of notification of the departure - and of available alternative providers - by Union solidified that they are not working for the patients. I have been thoroughly pleased with the services I received through Regional Hospital and its staff. I get to talk to real people; I get return phone calls in a timely manner; I can spend more than 5 minutes with a medical professional who attempts to learn about me and my issues, discusses various options rather than providing knee-jerk bandaids (they're permitted to actually spend more than 3-5 minutes per patient), and works out a plan suited to the individual. I was a Union patient for many, many years, and was extremely happy with the level of care received ... until the past several years. It speaks volumes when good providers choose to leave because they are being forced to meet quotas rather than provide quality care to their patients. Allowing Union to be the largest medical corporation in Vigo County will not be in the best interests of the community.
Ruth A Pickens	Resident of Terre Haute/ Vigo County	I do not believe the merger of Terre Haute Regional & Union will benefit the people of Terre Haute.

Stacey Knowles	N/A	<p>My family is being affected by this proposed merger. From the beginning they said there would be no change for the employers. They were going to keep everyone. Yes they offered my husband a job but we will be losing \$800 plus in pay a month. I have always been on my husbands health insurance and Union Hospital is refusing to allow me to be covered on their plan. My work offers insurance that is so expensive I can not afford it. When giving offers to the HCA employees they were only given until December 30th to sign a paper saying they would except Unions offer. Most had no choice in signing this. Itâ€™s either sign it or you go on unemployment once the merger is complete. I know in the little bit of the 599 plus pages of their application on here it said there is other jobs that the employees could seek. I believe all those supposed options are lies. Yes if you are a nurse or doctor you could probably go anywhere but all the other employees that do everything in the background without the recognition have no where to go as those jobs are in short supply in our area. The Sullivan daily times just had a news arrival saying their unemployment rate just increased by quite a bit. Outside of all the set backs for the employees I believe a big downside to this would be the lack of competition. Yes they probably have to agree to keep employees and costs a certain way for so long itâ€™s what to say a couple years down the road people are being payed off and prices start increasing. This area struggles enough paying for things and to limit healthcare options is going to make it even worse. I hope whoever gets to make this decision looks at all that is effected and realize anyone can promise the moon until their required time frame is up then they hand you walking papers and higher bills.</p>
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Larry E Johnson	Vigo county resident	<p>The merger between Union Hospital and Terre Haute Regional Hospital would definitely create a monopoly on health care and potentially degraded health care down the road.</p>
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phil deckert	have power of attorney for patient	due to conflicts with union hospital, there association with Hamilton center and WIN facility this merger would be bias and discriminatory toward the patient I assist in her treatment as the patient has been blacked balled and denied treatment in the past. i my self have been exposed to MERSA at union in the past and never at reginal hospital. there is no reason to merge hospitals and cause undue burden on patients that use reginal hospital. both facilities are in good standing and are not suffering financial hardships so could flourish without a merger. stop corporate monopolies. many states have discontinued there COPA authority. this merger will only harm the citizens that prefer an option and or facility to receive a second opinion. any additional services or practices promised by this merger could be acquired without a merger. keep in perspective that these are human lives we are voicing concerns about. if its not broke don't fix it. as aforementioned these facilities are operation adequately without merger so stay independent operations. any and all patients having conflicts with union hospital will be prejudice by union hospital controlling reginal hospital and this is a great concern to the health and safety of the American people and our rights to receive adequate medical treatment. WE THE PEOPLE do not need interference in these hospitals that are functioning as they are now.
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Ryan Smith	NA	This will drive up prices and reduce healthcare options for a community that already struggles to fulfill its medical obligations.
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Phil deckert	power of attorney for patient	the merger would be preadjust against the patient i represent as there is a conflict of interest with union hospital and there association with Hamilton center and WIN facility. union hospital already holds a monopoly on most health care and to further that monopoly would only harm the citizens and there access to needed care. those whom have an exsisting or future conflict with union will suffer if union also controls reginal hospital and its assets. many states have already recalled the authority of COPA as it has found to de discriminatory and harmful to restrict authority to branches that can oversee unfair practices. thus shall include the facts that neither facility is suffering financial burdens and any perposals toward how it would benefit the community could be done without the merger. the citizen's deserve a second option and this right would be removed if one corporation is granted total authority. these are human lives at stake. i my self have contracted MERSA twice from union but never from reginal hospital. if its not broke don't fix it. As aforementioned WE THE PEOPLE want options to our health care. union hospital has not offered any proposal that couldn't be implemented outside of the merger, all benefits could still be obtained independently. many states have already recalled the authority of a COPA as it has been established to be prejudices to the people and the community.
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Caitlin Hunt	WTHI	How will prices for medical care be affected if the merger goes through? What kind of benefits will happen because of the merger?
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Renee Hawkins	Individual	I don't know how Union hospital that has no urologists affiliated with them who accepts new patients can be allowed to merge with another hospital(Regional) in the same position. My mother was admitted to Union Hospital on New Years Eve with a kidney stone and became septic very quickly and neither hospital had a urologist that would accept new patients so we had to wait until she became stable and was finally transferred to St. Vincent Carmel in Indianapolis. Thankfully while @ Union the ER doctor got a radiologist Dr to put in a tube and stent in through her back and into the kidney to start draining the fluid and infection. This procedure more than likely saved her life. We were told that she couldn't be transferre to a smaller hospital who had urologists because they could only transfer to a hospital with the same level of care as the hospital she was coming from. It's absolutely ridicoulus that a town the size of Terre Haute has two hospitals that can merge but don't have speciality physcians that are needed who are willing to take new patients.
Michele	regional hospital	It feels like a hostile take over. People are not happy employs are not happy doctors are not happy and most of all patients are not happy. They feel they have no choice and they have said they will just go to Indy. Union will be a total monopoly as an employee you are unable to go outside the network. Can not order 90 day medications everything has to go through them. When you have no choices you have bad moral. People who left union as employees stated they never want to go back there because there are to many issues with personel nobody is telling us the status of things we are just told to sign papers without truly knowing what we are signing. It is a bad thing for our community.
Renee Hawkins	Individual	I don't know how two hospitals that don't have urologists who will accept new patients would be allowed to merge. My mother was admitted to Union Hospital on New Years Eve with a kidney stone who became septic very quickly. Thankfully the ER doctor was able to get a radiology doctor to put a stent and tube through her back into her kidney to drain the fluid and infection. The procedure more than likely saved her life. We waited two days for her to become stable enough to be transported to St. Vincent in Carmel so she could be seen by an urologist. I don't feel these two hospitals should be allowe to merge until they at least get more resources in place to effectively treat their patients.
Allison Windell	HCA Terre Haute Regional Hospital	I currently work at regional hospital as a part time employee and have good benefits. With the merger union is not going to honor my current benefits so I will get taken away my PTO accrual, my 401 k match, and my short term disability. Per union part time at 24 hrs per week does not qualify you for benefits so all those benefits that I currently get will go away. The only thing they are offering me is health insurance which isnâ€™t as good as the health insurance I currently have. Iâ€™m a single mom of three and really relied on my benefits. Union doesnâ€™t seem to care. You are only a number to them.

Debra Ann Reeves	508162	<p>In my opinion, this merger is not in the best interest of Vigo County. With bad experiences at Union Hospital in the past, my husband and I turned our healthcare to Regional Hospital. Political moves within Regional Hospital caused the doctors that we interacted with to leave. Also, Union Hospital does not use all its' room space now, and again I feel it will be a monopoly. Also, it seems it would be more tangled, since Regional Hospital was a "For Profit" hospital and Union Hospital is not. I hope the Indiana Department of Hospitals and Health will cast a negative vote for this merge.,</p>
Misty Dillinger	Regional Hospital	<p>Please do not approve the merger between union hospital and regional hospital</p>
Christophe r Shawn McCrocklin	Terre Haute Regional Hospital/Union Hospital	<p>Having spent an extensive amount of time at both hospitals, with my mother, in recent years, I can say, unequivocally that this merger will harm healthcare in the Wabash Valley. The care she received at Terre Haute regional Hospital far exceeded that at Union Hospital. The quality and expertise of the doctors and staff at regional Hospital found causes for her ailments which union completely missed or neglected. The one on one attention at regional versus being made to feel like a nuisance at union made the experience much less difficult for her and our family. Member of staff from janitorial to executive at regional showed compassion and a desire to help patients. Meanwhile at union it was often hard to find anyone and often when you did, they would say "I'll find someone to help you and then leave never to be heard from again. Staff at Union seem to treat every patient as though they are drug seeking or just a nuisance. My mother was experiencing severe health issues that were left completely untreated, only to be discovered by staff at regional. This community needs regional hospital independent of Union Hospital to have somewhere with competent medical care. I apologize for the incorrect capitalization in this however, I am submitting it on my phone. Thank you for your time and attention.</p>
Craig Mitchell	None	<p>My concern stems from the fact that if this merger goes through, there will be no competitive pricing. Union Hospital currently charges some outrageous rates for even the most basic services. Although Regional has similar costs on some services, their pricing is a little more reasonable on a lot of services. Being able to use Regional as an alternative gives a person like me, who is fighting cancer, some options.</p>
Melanie Miller	Self	<p>I do not feel that merging the two hospitals, Union and Regional, will benefit Vigo County and the surrounding Southern, southeastern, and southwestern counties. Especially concerned for cancer patients who have to travel daily from these areas in order to receive radiation therapy treatment, usually for several weeks, chemotherapy regimens that are sometimes given weekly, several days in a row for several months. Traveling through Terre Haute and all of the stoplights to the north side of town will add more stress to their already stressful situation. Please consider that a South side oncology offering is needed for the community and the surrounding areas currently receiving service from Terre Haute Regional hospital.</p>

Robert Joseph Fischer	individual	Having only one hospital will be a monopoly and there will be no reason for better service and no controls over service charges. Patients and insurance rates will suffer after the 5 year oversight term.
Brenda Fischer	individual	Please do NOT allow Union Hospital to have a monopoly on health services in Terre Haute and the surrounding area. They already have areas in Clinton, West Terre Haute & Brazil. This will greatly diminish health care in the Wabash Valley and allow them to charge whatever they want when they want. This is definitely not to the patient's advantage. I also feel it will limit services and will limit then even more once the government is not watching what they are doing. NOT IN OUR BEST INTEREST.
Gloria Sachdev	Employers Forum of Indiana	Thank you for offering this public comment opportunity. I received a message this site is not working so this is a test try myself.
Amber Armstrong	I fear for my job or else I can't tell you	<p>I am writing you with concern over a possible merger of two hospitals in Vigo County, Union Hospital and Terre Haute Regional Hospital. These are the only hospitals in Vigo County. In early September a purchase agreement has been agreed upon by both parties, Union Hospital purchasing Terre Haute Regional Hospital (which is owned by HCA Corporation). My concern along with many others is if this purchase were to be made that would create a monopoly of hospital services in this county and our options for good and affordable healthcare would diminish. Vigo County is a healthcare hub for many other smaller surrounding counties (including but not limited to Sullivan, Vermillion, and Parke counties). Union Hospital already purchased another smaller hospital in Vermillion County Indiana (a bordering county to Vigo County) in 2006 after gaining control of the hospital in 1996. Vermillion County has no other hospital. As a former resident of Vermillion County I know that this proposed merger further limits the access of good quality and affordable healthcare to the residents of Vermillion County. Another concern that arises for me that if this merger should happen will any governing body step in and make sure the cost of healthcare does not rise? I spoke with Senator Jon Ford via text message and he stated that Union Hospital may not have to apply for a COPA. If Union Hospital is not controlled by the rules of a COPA then they will have free reign to do whatever they please with healthcare costs. I also have concern that the State of Indiana is in such favor of this proposed merger that they have skewed and created new laws for just this proposed merger. Also, the state may have created such laws that don't require the hospital purchase to be reported to the FTC. Please see Indiana State Bill 416 and State Bill 298 regarding hospital mergers. I am also concerned for the citizens of Vigo County and surrounding areas to have access to good quality healthcare. Steve Holman, CEO of Union Hospital, stood in front of the Indiana General Assembly in February of 2021 and talked about Vigo County's terrible healthcare metrics stating that Vigo County is 84th in quality of life, 85th in health factors, 87th in health behaviors (i.e. smoking), 79th in socioeconomic factors (i.e. unemployment, educational attainment). Sidenote: there are only 92 counties in Indiana. Mr. Holman recited these numbers in front of the general assembly in hopes to get them to make laws that enable Union Hospital to purchase Terre Haute Regional Hospital by showing a county in desperation. But, what Mr. Holman failed to mention to the General Assembly is that Union Hospital and its subsidiaries provide substantial more healthcare services to more citizens of Vigo County and surrounding areas than Terre Haute Regional Hospital. So, if they are providing the most services to these citizens, then aren't they a big part of the problem as to why our healthcare metrics are so terrible? And, Do we think that allowing these two hospitals to merge would create a better outcome in metrics for Vigo County? My fear for the citizens is that a hospital merger may only make things worse in terms of quality healthcare. Lastly, my concern regarding this merger is there may be some kickbacks being given by Union Hospital to Indiana Senators and Representatives. I have no proof. But what I can tell you is that Senator Jon Ford was approached by Union Hospital to help them with getting this merger off the ground. Mr. Ford introduced Mr. Holman to the Indiana General Assembly in February 2021. Mr. Ford was also co-author</p>

of the above mentioned State Bills that were custom tailored to benefit Union Hospital. When Union Hospital announced the purchase agreement on September 13, 2023 and two days later on September 15, 2023 Mr. Ford announces his resignation from the Indiana State Senate ahead of his term limit. Which is very concerning and somewhat suspicious. I do feel the more you research this proposed merger the more you may find out, things that I do not have knowledge of. In conclusion I would like to thank you for your time and consideration in helping a community and its citizens in need.

trina elslager	norwex	I do NOT support the merger of Union and Regional Hospitals.
Test	Test	Test
Amy Pryor	Care giver	This merger is a bad idea I have never had a good experience with Union and I have heard so many people say they will start going to Indy if this happen !!!
Nancy Miller	Private citizen	Having all health facilities under control of one company/corp. is not good for the our area. My family have been patients of both Union & Regional. We have been much more pleased by the atmosphere & treatment at Regional. We feel that Union could use the funds they are using to purchase Regional to supply the services they are wanting to provide. We hope much consideration is given to the creation of a health care monopoly that this would create.
Jean Abner	None, grandson was patient	Donâ€™t do it, we should have an option, my recent experience with Union hospital in Terre Haute was terrible, nobody was communicating with each other or with family! Complete fiasco, never want to go there again..
Susan Long	None	I am not supportive of a merger between our two hospitals. They need to stay separate for the best healthcare coverage for our town!
Brigitte S Gardner	N/A	I am not in favour of the merger. Regional Hospital is clearly the better hospital on its own. I especially dislike Union Hospital's billing practices.
Lisa Brinkman	None	I think it will create a monopoly in healthcare which is not beneficial for my community.
Manda Boyer	None	This is NOT a good thing. It's a medical monopoly and it will create more issues in the future for the worse and not for the better. Neither place is able to keep employees very well and if this happens I see MANY leaving for other facilities and or becoming traveling medical staff.
Kris Southard	Self	I donâ€™t know how Union Hospital can possibly take on Regional Hospital when it takes 8 plus hours to admit patients to Union. I donâ€™t think patients would benefit at all by a merger. Not to mention that Union only has one CT scan & it is closed.

John Edwards	Retired	Union Hospital should NOT be allowed to acquire Regional Hospital! I am completely fed up with the quality of service provided by Union Hospital. I like my doctor, but his staff sucks. It takes forever to get a appointment, I have had instances where I never got a return call, medication refills not handled in a timely manner even phoning to emphasize that my medication was running out. I would have picked Regional Hospital over Union any day of the week. Union Hospital is too expensive for the services you get and if Union Hospital is allowed to purchase Regional it would give them a monopoly and the citizens of the Wabash Valley will end up getting screwed! I don't have a problem with Regional selling, but I would much rather someone like Horizon or St Vincent taking it so people have a choice. If you get in a accident the ambulance is not going to take you to Paris or Brazil if you don't want to go to Union.
Sue Loughlin	Tribune-Star	The Tribune-Star is requesting this information
Sue Loughlin	Terre Haute Tribune-Star	We are requesting a digital copy of the Union Health COPA application to acquire Regional Hospital.
Brenda Hollowell	Regional Hospital	I do not think the hospitals should merge. I think patients should have choices of hospitals to go to. I have talked to several patients that do not want the merger. I've heard complaints about the care they have received at Union Hospital. Health care it's already too expensive without the competition between hospitals.
Doris Fisher	Resident	I do not want Union Hospital to acquire Terre Haute Regional Hospital! I like have 2 different choices for my healthcare. I am self pay and I can get a much larger discount at Regional. We need choices in our healthcare, not 1 company owning all of our physicians! Please do not let this happen
Tanya Barger	Concerned Citizen of Vigo Co	The proposed merger via a COPA will not be in the best interest of our community. Anyone who understands economics knows that competition is beneficial whereas monopolies have a negative impact. Quality of care will decline, medical costs increase and employee wages decrease. As a member of this community I very strongly oppose this merger.
Monte Fisher	Resident	We don't want a healthcare monopoly. One provider leaves no choices or options.
Terry White	Private citizen	I think the merger is a terrible idea. It will only drive up health care costs. They have to pay for the cost of the merger to start with and with only 1 provider they can charge what ever they want. The government is supposed to stop monopolies but you keep letting them happen and the average person keeps getting screwed.

John Hawkins	Consumer	I am opposed to this merger, out of fear of the loss of competitive healthcare cost in the long term. Union Hospital has issues with staffing, and providing quality healthcare. Regional has always been the standard that the community has gaged quality healthcare. The cost that Union Hospital is estimating required for the purchase as well as upgrades at Regional Hospital will make it non-viable in the long-term, increasing cost long-term. Both hospitals service not just vigo county, but also the surrounding counties of Park, Clay, Sullivan in Vermillion county and clark county Illinois. This has a potential effect, the healthcare, in many surrounding communities, based on accessibility, and cost.
Steven A Keller	Vigo County Senior	The starting point should be how do we reduce emergency room waiting times under one to two hours without people with chest pains laying in the hallways. Unions procedure of who needs to be prioritized just doesn't work because those doing the prioritizing are not qualified, that's how chest pains end up in the hallway. Number two is to look at walk in clinic doctors vs Union owned doctors. A walk in clinic can will provide care to include prescriptions while a (some) doctors that work for Union will not and I am not sure why because they used to until taken over by Union. No matter what of a merger takes place it will not help the community unless the Hospital gets better and faster at helping.
Wanda K Taylor	Myself	I go to Regional because I like the care I get. I don't like Union hospital. I didn't feel that I got good care there. It's too big and too much business attitude and making money. I hope and pray that union doesn't shut my hospital down. I just don't want to deal with union hospital conglomerate and upcoming monopoly of hospitals in this area. I'm very upset and concerned about this. Doctors under the control of Union doesn't have time for patients. Union makes the doctors over schedule appointments and only allow doctors to spend very little time with patients. This is a valuable asset in health care I think. But it's all about the money to Union hospital not the personal care that one gets from the staff at Regional. I'm very sad about this. I guess if I have to I'll lose my great doctor that practices at Regional. In fact I have 2 great doctors there. I guess I'll take my hospital business to Brazil at St Vincent until Union tries to monopolize them too.
Geoff Harris	None	I don't believe that Union Health taking over Regional is good. Citizens will lose their choice of healthcare. No monopoly is ever good. The quality of healthcare will also decline. Please do not allow this merger.

Richard Larsen	Citizen	I support any plan that hat improves our health care. Based though in what Iâ€™ve read Iâ€™m questioning whether this proposal will do that. Union currently has problems staffing its current facility. The staffing problem impacts health care. How can they adequately then staff another huge complex? Stories I have read also question whether the merger will actually improve health care and point instead to higher health care costs. As a struggling senior citizen this troubles me. Union is supposed to be a not for profit. I think competition can be a good thing and as our heath care and costs are at stake this matter must be carefully considered. Thank you.
Barbara Joyner	Vigo County Resident	What is the plan to make sure that hospital cost do not sky rocket? I know that they will be watched for a few years but then what? No competition gives them the freedom to charge whatever they want. Leaving south, Union isn't very convenient especially as we grow older.
Chris Hirons	Vigo county resident	I donâ€™t think the the Union and Regional hospital merger shouldnâ€™t be approved, limiting choices, reduces level of customer service and drives up prices. Without competition tend to get complacent and level Of care will go down.
mark e washburn	Self	I think we need to keep two separate hospitals

Katrina Pender	NA	<p>I am writing in opposition of the proposed merger of Union Hospital, Inc., and Terre Haute Regional Hospital. I have been a healthcare provider in Vigo County for over 25 years. My understanding is that the merger must provide evidence for improving health outcomes, healthcare access, and the quality of the healthcare provided to the populations served. In addition, these benefits must outweigh potential disadvantages. First, Union Hospital has submitted plans to focus on population health. As a non-profit entity with the largest footprint in the surrounding counties, what about this merger makes this a priority now? The merger does not eliminate a barrier to accomplishing this goal. They can effectively do this without wiping out the competition in the market. Second, the merger does not improve access to care. In fact, Regional Hospital provides services to many residents south of Vigo County. Per the published plan, OB services and all larger surgeries would be moved to the North campus. This lessens access to care for those residents without the means to travel an additional 5.5 miles north. The ICU would transition to the North campus. The current ICU at Union Hospital does not have the capacity to absorb the patients currently housed in Regional Hospital's ICU. Furthermore, the plan implies that adding the small number of employed physicians somehow improves services or access? How? The number of providers remains the same. In addition, the plan states that Regional Hospital does not have an employed primary care base. This is correct. They have a number of independent primary care providers that choose to practice at Regional Hospital. It is not necessary to be employed. Employed primary care providers feed your specialties. Union Hospital already demonstrates this in their current model. Quality improvement has yet to be documented in healthcare mergers in this country. Union Hospital has not been the top quality performer in the area. Their footprint is larger than that of Regional Hospital. Their quality indicators have not shown them to be the clear leader in quality healthcare. I am concerned that eliminating competition in the market will lead to a decrease in the already mediocre quality data. Data is publicly reported on Medicare.gov. The Robert Wood Johnson Foundation has reported on healthcare mergers for decades. Throughout this time, many other groups and individuals have researched and written about merger experiences. Most, if not all, conclude that quality suffers and pricing increases. In closing, I feel that HCA has failed the community and the employees at Regional Hospital by failing to provide adequate support to the facility. I am in support of Regional Hospital being acquired by someone other than HCA. A merger in the market does not meet the standards required for the COPA, in my opinion, as the perceived benefits do not outweigh the potential disadvantages.</p>
Susan Modesitt	Union	<p>I'm deeply concerned about the medical monopoly that Union will have in the Wabash valley after the take over of Regional. I would like to see another buyer ; possibly IU, St V or maybe Franciscan</p>
Amanda Bauer	Union/Regional Hospitals	<p>I do not believe a healthcare monopoly is best for the community in which I reside. The lack of competition for wages and benefits will also not be in the best interest of healthcare professionals in Vigo County. Please take into consideration the difference in patient beds between facilities as well as the geography in relation to acute care hospitals. Please also note that Regional Hospital does in fact offer dialysis on the 3rd floor in a room dedicated to hemodialysis and urgent care is not needed as their family physicians see patients for sickness and urgent needs unlike Union. Being seen by your family physician offers continuity of care and preferred by many members of the community including myself. Please also see contracts with local physicians and no compete documents that strong hold physicians and mid levels from practicing at both facilities.</p>
Brooke	Terre haute	<p>I think this is a horrible idea I hate union they are so slow I will never go to union .</p>

Marianne Bayless RN	Terre Haute Regional Hospital	I am a RN at Terre Haute Regional Hospital. I have worked ICU her for 28 years. I do not believe that a merger of Union and Reguonal will benefit anyone here in Terre Haute. A merger will be a monopoly. Prices will not have to be competitive nor will staff pay. People in rural areas will have to travel another 20-30 minutes. This could be fatal for some if having a myocardial infarction or other life threatening illnesses. Union proposes to dissolve the currently busy ICU and the Cath lab. This would have many ramifications. Union is often on diversion related to having no beds in their ICU. Both ICUs and ERs are busy units. I do not believe that one ICU will house all the critical patient in Terre Haute and from the surrounding areas. There would be problems at the Regional facility if a patient became critical on the floor. Who would maintain this patient until transport could be provided? Competitive pay and prices would be hindered by a monopoly as well. Please consider the ramifications that a monopoly would create in our town of Terre Haute. I thank you for your time and consideration in the matter.
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John williams	Union Hospital	I am responding to the merger between regional hospital and Union hospital. I do not feel that having one provider of care managing acute care for both hospitals will be a good thing. There are no choices now for local residents. If choice is desired, locals would have to drive to Indianapolis for a choice of different hospital services, how is that better for the citizens of the community? What spurs better services in any type of business model? Choice! Without choices, what incentives will this one company, that will provide medical services for its community members? The motto can be, take us or drive an hour somewhere else because thatâ€™s your only choice left. That is by all accounts, a monopoly, right? I would hope that legislators look at this with an impartial eye to see the impact it will have for choice of services. If this were a small city, I would understand that having 2 competitors would be a bit overkill but for this sized city, with hopes of expanding, Iâ€™d like to think we continue to keep two facilities that push each other to be better, not to become just meh. Do better. This is the wrong direction.
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Sara Allard	Saint Mary-of-the-Woods College	Regional Hospital consistently gets higher ER safety scores than Union Hospital. Regional often scores an A, while Union scores a C. When I needed to be hospitalized in 2018, I chose Regional because I knew I would get more personal care and attention than I would at Union. I don't want the staff at Regional to become as overworked and spread thin as the staff at Union, and worry that will happen thanks to this merger.
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Ann brooks	Individual	I think every person should have the right to choose the hospital they wish to attend. This concerns me very much. I want a choice. I happen to like the hospital south where I live. Our medical choices have slowly been removed. We cannot even have our own physicians treat us at the hospitals anymore. Rather we have strangers treat us that know nothing about us. We need the choice of where we go, not a monopoly in town. This just is not right to the citizens of vigo county. I personally am quite upset over the thought of a merger or a takeover. Thank you.
Kerry Damanis	Resident	I do not think the merger of Union Hospital and Regional is in the best interest of the public. To force everyone to only have access to one line of care is not the correct choice. I have had services at both hospitals and Regionals staff and facility was far superior. The care the Regional staff gives their patients is exceptional as well as the cost being far more fair. The people in Vigo County deserve a chance to make a choice for themselves and not be forced to only use one source of healthcare
Robert Brenton	Self	If union health contracts with regional doctors,all appointments will be at least 1 month late and people will be advised to go to the emergency room at great cost
Samantha Smith	Employee	The merger between hospitals will cause delay in care to patients. Life threatening emergencies for cardiac care will be delayed to patients having a travel further for care. It will also displace patients and employees due to the extra travel. Both hospitals are already understaffed and it will become worse if the hospitals merger.
Sarah Taney	Employee working in Vigo county	Do not approve of union buying regional .. have alway used this hospital,
Bradford J Barrett, MD	Indiana General Assembly	As a retired surgeon and Chair of the Indiana House Public Health Committee, I was closely involved in the creation of the language for the COPA law. This was crafted under incredible scrutiny as the state was sensitive to healthcare consolidation , the high cost of health care and poor health metrics statewide, particularly in the west central portion of Indiana. Keeping those factors in mind, we created a COPA law that has protections to ensure access to care, quality care and affordable care. It is my opinion that all of these factors and several others were considered during the legislative process, with the addition of appropriate guardrails and oversight , to allow this acquisition of a rural Indiana community's struggling hospital system by Union Healthl. It is because of my knowledge of the process and the effort involved in creating this legislation, that I strongly support the Union Health acquisition of Regional Hospital in Terre Haute to maintain access to quality, affordable healthcare for members of the regional community.

Angela S	Former worker at both Regional & Union	<p>I can tell you from first hand experience that Regional was a wonderful hospital & the nurses gave great care. Along with that came management that listened to your concerns & addressed them. I worked for Regional for 15 years, relocated & then worked at Union. My former position had been filled & this time physicians as well as some excellent nurse practioners pulled out due to the discussion of merging. Union hospital doesn't care about their employees. Management there will let you sink. For instance, when I worked in cardiac monitoring we were supposed to work with 3 monitor techs. There were & still are several nights where only 1 monitor tech works. They watch several floors at the same time. The manager over this unit continues to allow it. It is a safety issue, employees are not getting breaks, & being held responsible for sometimes 100 heart rhythms. Why should one hospital in a town this size, give the residents only one choice? There are several physicians that have privileges at both hospitals. A merge on these two hospitals puts this community at risk. If these hospitals merge, I will move my healthcare services somewhere else. It would be more beneficial for IU health to come in.</p>
Brianna Cote	Terre Haute Regional Hospital	<p>In regards to the Regional and Union Hospital merger i feel this will hurt Terre Haute and surrounding communities in ways that will be irreversible. Hospitals always preach patient safety and satisfaction is their number one priority so how is eliminating an entire trauma center, ICU, and cath lab helping in either of those two areas? When time is of the essence for survival they are eliminating the most essential services needed to save the lives of community members. If the merger were to go through, ultimately patients will wait longer for care due to an over stressed hospital system, short staffing and unavailable beds to cater to patient needs. Patients will no longer have options in town to receive care from. One bad experience at the new Union will have patients traveling to Indianapolis for their care, taking business out of Terre Haute. With the population of Terre Haute growing every year, how is removing access to healthcare on the south side bettering the community? As a former member of the Terre haute community and Regional Employee I truly feel for those that will need emergency medical attention post merger and will have no option but to wait their turn and waste time traveling to one sole campus hoping thereâ€™s a trauma bay open, cath lab room available, or an ICU bed open to help your loved one survive. Regional has been made out in the media to be a hospital unable to provide care, no staff or doctors, no dialysis, no critical care patient population when that is simply not true. Regional is like any other hospital, understaffed at times like anywhere else, but more than capable of continuing to provide care to the community in any aspect. Patients appreciated having two hospitals in the community, it allowed them to have autonomy over their health care and allowed them to have a second opinion when facing medical issues without having to commute to Indianapolis. I do think HCA needs outside help to revitalize Regional and bring in more specialists and expand on the care we currently provide, allowing more services to offer to the community instead of eliminating entire units. Merging with Union to create a monopoly is simply not the answer, and not what the community needs.</p>

Larry Davis	Community	While I can appreciate Union Health attempting to acquire the facility known as Regional Hospital, I would think that the 'monopoly' in Health Care resulting in their acquiring Regional would work to the advantage of Terre Haute and the surrounding communities. Competition in any business/service serves to allow the consumer to have a 'choice' whereas a 'monopoly' limits that 'choice.' With 'health care' continually rising and the 'cost of living' increasing reflected in our incomes being slim to none, I would appreciate a choice in the care and price in our community.
Karen Grissom	Terre Haute Regional Hospital	I have been employed at Regional for more than two decades and have been part of a team providing competent care geared towards providing patients with the best possible outcomes. I maintained a good attitude about the acquisition by Union until I saw the plan outlined in the COPA document. Now, I have serious concerns because I feel Union's plan cripples health care on the south side and places residents at risk. In my opinion, moving Cardiac Cath Lab to Union only is a mistake. It is well evidenced that "time is muscle" when someone is having a heart attack. The extra time to get across town, be taken to an already overcrowded Emergency Department, and then finally getting to CCL will result in increases in mortality and morbidity. Not to mention the potential delays while waiting for a CCL suite and team to be available if every case is being done in the same building. I have similar concerns about turning ICU into a Clinical Decision Unit. Without an ICU in the building, any patient presenting to the ED with a need for ICU will have to be boarded in the ED until a bed at Union and transport become available. This will tie up ED nurses and delay throughput for less critical patients. Similarly, what happens when a patient decompensates on a med-surg unit or on the Clinical Decision Unit? We will have non-critical care nurses managing a critical patient until a bed at Union and transport become available. Med-surg nurses manage 5-6 patients each. If they are tied up with one patient, their remaining patients will be unattended. It doesn't matter if the nurses are team oriented. Any nurse managing a load of six patients has little time to take over care of someone else's assignment. I would also like you to keep in mind that 911 calls take priority for ambulance transport. We already experience delays of several hours in transfer due to transport issues. I also disagree with moving all Women's and Children's Services to Union only. Union routinely cancels inductions due to a lack of labor beds. While Regional does not have a high number of deliveries, it seems it would be difficult for Union to absorb those we do have. It makes more sense to bring a couple OB physicians to the south end of town. I feel Union strongly exaggerated Regional's deficiencies in the COPA document. Yes, we have staffing issues. Union has them as well. As does every health care facility across the nation. The nursing shortage is not a Regional issue, it is a global issue and nurses at Regional feel that Union is buying our nurses to staff their building. Staffing issues at Regional have compounded since Union announced that it was acquiring us. Staff are not comfortable with the uncertainty, do not want to work for Union, or do not want to add the additional minutes to their commute. I anticipate the exodus of staff will increase since the release of the COPA document as many of our ICU nurses have expressed that they do not want to work out of Union's building. Med-surg and ED staff do not want to work in a building with no ICU. Union is touting that they have the community in mind and perhaps they believe they do. However, from a resident of the south end, I say an emphatic "NO" to the acquisition. It is clear HCA wants to sell Regional, and they have the right to do so, but Union is the wrong choice of buyers. Having the only two acute care facilities in town owned by the same company eliminates competition. This, in turn, may cause reductions in quality care for patients and reductions in pay for staff. Community members should have a choice of who they want providing their care. This acquisition eliminates that choice. Please consider this acquisition carefully and with the south end residents in mind. Respectfully, Karen Grissom, DNP, MBA, RN, NPD-BC (34-year healthcare veteran)

Timothy edmonson	Indiana resident	This is not a good deal for the people of terre haute
Kim Hill	About hospitals merging	I disagree with Hospitals merging in health care.
CHRISTINA BROWN, RN	Regional Hospital	<p>As a registered nurse in Labor and Delivery, I have great concern regarding the closing of OB services at Regional Hospital. Moving OB services to the Union campus limits choice to not only those in Terre Haute, but also the surrounding communities in Clay, Greene, and Sullivan county, as well as Eastern Illinois. They will have to choose to either deliver at a critical access hospital with no NICU services or OB OR services on the unit, or to drive the further distance to Union hospital. Given the socioeconomic status of much of the community, this will prove to be a financial burden as well. Patients should have a choice as to a more intimate, LDRP birth experience, providing a continuity of care they would not receive at Union Hospital due to the units being separate areas of care. Many patients and members of the community have expressed a concern as to limited choice and a "monopoly". Patients are expressing concern as to having no voice regarding everything being under one hospital and physicians' services system. Regarding ICU, in the event of a maternal crisis, having access to ICU has literally saved the lives of previous patients. The volume of patients received through the ED and admitted to the ICU would seem unmanageable if moved to one campus. Many times Union has diverted to Regional and the reverse has occurred. Having 2 hospitals able to provide emergency services, trauma & intensive care provides the community with resources necessary for delivering the care they deserve and have come to depend upon. Again, if the CCL is moved to only Union, this means those coming from the Southern portions of the Wabash Valley will have a delay in life-saving care. This 15 minute delay could quite literally be the difference between living or dying. For all of these reasons, I do not believe this merger is best for our community at large.</p>
Jennifer Lynn Thomas	Patient	<p>I personally have a conflict of interest with the union based health care, that's why I use reginal. I have multiple health issues that I see regional based Drs and have testing done there at the hospital. I have never had any negative issues with reginal, unlike at union and it's affiliates. With there being a conflict I don't believe that I would still have full access to the addiquit health care as I do now if they allow this merge. I'm 100% positive that I'm not the only patient out there with these same issues,may even be vise versa. I can't lose any of my health care providers please consider us the patient's and our needs. Thank you & God Bless</p>

Janet E. Hammond	Self	<p>I am opposed to the merger of the two local hospitals. I have recently been to both and I can say hands down, that Union was the worst emergency room experience I have had. They either are understaffed, mismanaged or both. I spent 4 hours in the waiting room for a kidney stone that was currently being treated. My husband has had several and never did he have to wait to get treated. Union has caused many of our Doctors to leave their practice's due to disagreements on how Union tries to run the practices and Non Compete clauses. I feel a hospital should not be allowed to hold any health care professional to a non-compete clause. Doctors are in short supply as it is. Union Hospital Managment has caused the shortage of doctors in our area and now expects to be rewarded by merging/closing its competition.</p>
Michael Kuckewich	Citizen of Vigo County	<p>Bad idea, who will pick up the tab for the taxes THRH will no longer pay. Mergers cause layoffs and cost increases</p>
Jeane Melendy	Individual	<p>I think that this is dangerous & harmful to have one entity control the health of the people.</p>
Lynn	N/A	<p>I donâ€™t think the merger proposal is acceptable. Both hospitals are running understaffed now. I donâ€™t see how combining the same patient loads with the same inadequate staff to patient ratios will improve anything. People living in southern parts of the county arenâ€™t going to want to drive to the far north side for care. Regionalâ€™s proximity to US 41 and I-70 I feel warrants having its own trauma center if for no other reason than the number of car accidents that seem to occur on the south side of town. They can get to Regional quickly vs driving cross town to Union. Staff who live near their respective employers are definitely not going to be happy about increased drive times and potential the need to relocate and possibly even forcing them to make their kids switch schools. I can see a bunch of staff walking away if the merger goes through leaving not enough staff at either facility.</p>

Dr. Christophe r Garmon	University of Missouri Kansas City	<p>I have over 20 years of experience studying hospital mergers. In particular, I have studied (with Kishan Bhatt) the long run effects of hospital mergers subject to Certificates of Public Advantage (COPA), like the proposed merger between Union Health and Terre Haute Regional Hospital. Our findings were published in the Journal of Law and Economics in 2022. (See https://www.journals.uchicago.edu/doi/10.1086/719661.) We studied all of the horizontal COPA mergers that occurred prior to 2015. Our ultimate conclusion was that “in the long run, hospital mergers shielded with COPAs often lead to higher prices and reduced quality from unconstrained provider market power.” This is because, in most of the cases we studied, COPA regulation expired or was repealed, leaving a largely unregulated hospital system with market power. Hospitals that propose to merge often make promises to do wonderful things for the community and make significant investments if the merger is allowed. In my experience, hospitals only follow through with those promises if they have the incentive to do so after the merger is complete. However, a merged hospital system that faces little remaining competition after the merger usually has little incentive to follow through with its promises because patients have no other choice than the merged monopoly hospital system. As one example among many, consider Ballad Health, which came together under a COPA and now has a monopoly in the tri-cities region of Northeast Tennessee and Southwest Virginia. It made many of the same promises that Union Health and Terre Haute Regional are making now. However, five years after the merger that formed Ballad Health, it has failed to deliver on many of those promises. (See https://kffhealthnews.org/news/article/appalachia-ballad-health-copa-monopoly-charity-care-quality/) In my opinion, when evaluating this COPA application, the Indiana Department of Health should carefully consider the competition that would be eliminated by this merger, and the remaining competition, if any, Union Health would face.</p>
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Donald T Scott	Sycamore Insurance	<p>According to data from the Indiana Department of Health’s (IDOH) county health scorecard, Vigo County ranks low in several key public health metrics, including 67th in life expectancy, 81st in adult obesity, 64th in infant mortality, and 62nd in suicide rate. The Certificate of Public Advantage being sought by Union Health and Regional Hospital has the ability to profoundly improve these poor public health metrics in Terre Haute/Vigo County, simultaneously improving quality and access to services while also maintaining or lowering costs. This is important to me in my role as President of Sycamore Insurance and as a long-time resident of Terre Haute and Vigo County. As our community continues to make strides in our community planning goals, including increasing population and income for our residents, I firmly believe this to be a step in the right direction”utilizing a creative and effective approach to remedy current barriers. I strongly support Union Health and Regional Hospital in their efforts to partner, and request that you approve of their application.</p>
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Blair Foxworthy	Union Hospital/Regional Hospital	<p>Union Hospital makes it very clear that their goal is to be the only hospital in the Wabash Valley. While Regional definitely needs some assistance, it is not in a dire of situation as Union claims. Moving access to one hospital on the north end of town not only hurts patients, but the employees that serve the community as well. Are they going to shuttle patients on a vent? Union cannot handle the patient influx to their ER as it is now, and closing the Trauma center at Regional will only increase that. They consistently have wait times of 3+ hours, patients being seen in the waiting room, etc. Only having one ICU, one Trauma Center, etc will create great harm. The businesses listed for employees to move to are not located in Terre Haute, many of them 30-60 minutes away. It is clear they want Regional for their nurses, and all other staff are to be thrown to the wayside. Things have not been taken into consideration such as physician credentialing, hospice teams, etc. No physicians have been spoken to about the merge. Union is trying to move so fast with this and pressuring employees to give private information to them. Steve Holliman sits at the top of the Indiana Hospital Association--how he can be unbiased in this situation is unclear. Additionally, \$10.5 million dollars in tax breaks to the city will also be lost annually. There is no good that comes from this merger.</p>
David McColl	self	<p>I believe that this merger will be a great benefit to the community. The strengths of both institutions combined together will help to grow and improve the health care options in Western Indiana and Eastern Illinois. There are so many benefits of combining resources to improve healthcare.</p>
Jaycie Smith	Union/Regional Merger	<p>On the COPA document, Union lists all of the other care facilities that are nearby that patients have access to but in reality, none of those other facilities have the capability to deal with the level of patients that Union and Regional do or they are simply too far away for a large part of the population. This will plain and simply be a monopoly of care. Period. Taking away access to choice is the very definition of a monopoly. You are giving patients no choice but to travel elsewhere or choose a lower level of care if they don't want to come to Union. We can do better for our community but this isn't it.</p>
Lindsay Farver	Paws-itively Pampered	<p>I am not in favor of the merger. I like healthcare options. And if Union health is going to be the monopoly, I will be looking at out of town options in Indianapolis and Bloomington for specialty healthcare.</p>
Philip deckert	power of attorney	<p>this merger would place my patient in extream dangers and preadjusts due to prior conflicts with union hospital, there affiliations with Hamilton center and WIN facility, thus includes complaints filed with the government agencies.</p>
phil deckert	medical power of attorney	<p>this merger would place my patient in extream dangers and preadjusts due to prior conflicts with union hospital, there affiliations with Hamilton center and WIN facility, thus includes complaints filed with the government agencies.</p>

Ryan Keller	Thrive West Central	As our region's Area Agency on Aging and Disability Resources, we are in favor of this merger and look forward to more options for care and treatment for community residents. Union Hospital has been a strong community partner in healthcare, both in treatment and prevention.
Dan Gmelich	Old National Bank	I'm a lifelong resident of the Wabash Valley and have never lived further than 30 miles from Union Hospital (UH). I was born at this hospital and have received 95% of all medical care at this hospital. As a product of Indiana State in finance and an MBA in business we all have grown up hearing about the problems with lack of competition or monopolies and that speaks for itself. Of course we make caveats for this all over the place for various reasons. In the arena of healthcare we have seen significant consolidation and the rise of healthcare systems. The idea of course being economies of scale in an industry that has seen runaway costs. As a local community ambassador serving on both the Terre Haute Chamber of Commerce and on the Terre Haute Economic Development Board and as a stakeholder and banking professional in this community, the opportunity before us today is to allow a local hospital (UH) who has already become the dominant market leader ORGANICALLY by bringing in top medical professionals, earning top accreditations and by reinvesting heavily into their facilities-- to become OUR local health system. A local not-for-profit system serving the local markets who is able to reinvestment in OUR community as opposed to a system who is not HQ'd here and filtering earnings back to either shareholders or stakeholders not in this community. Access will not be diminished. No doubt redundancy will be eliminated and new services will be offered filling more healthcare needs locally. I have great confidence this is the right move for our community and that UH will continue to serve our community with top level healthcare, wide ranging access to healthcare services to all and will do so affordably. And as a vested health system they will be well suited to take on the challenges that continue to plague our local communities. According to data from IDOH Vigo County ranks low in life expectancy, obesity, infant mortality and suicide. I support UH and their intent to partner with TH Regional to take on these challenges for residents of Vigo County and West Central, Indiana and I request that you recognize this unique opportunity and approve the COPA.

Paula J. Wilson	personal	<p>I am retired RN NP and have worked at both hospitals in the past. I am against the merger of the two hospitals. I live in Greene County but get the majority of my health care in Terre Haute. The merger of the 2 hospitals take away the consumer's choice of hospitals. Because the COPA states that they plan to move Regional's ICU, OB/NICU/Peds, the consumer's choice is further negated. For as long as I can remember people have chosen one hospital from the other based on personal preference, distance from their home, and physician preference. Although the COPA states the hospitals are only 51/2 miles apart, driving time is 15 to 20 minutes depending o.n the traffic lights, traffic, and road conditions. I also think it is a mistake to move Regional's ICU. I know that there are times when both units are full and can't accept new patients. How is the reduction of Critical Care Beds going to help that situation? I found several errors in the COPA regarding services offered at Regional. On one chart they list only IP/OP services for Emergency Department when Regional has a very good ED. Also It states there is no diabetic education and no dialysis. Both false. They have no specified Diabetic Educator but the nurses are taught how to educate the patients individually. Makes one wonder what else information is incorrect.</p>
Michael L. Wilson	none	<p>I am against the merger of Union and Regional Hospitals. I live in Greene County but receive most of my speciality care health care in Terre Haute. I think the merger of the two hospitals will reduce the quality of the care received and lengthen the waiting time for some services. I also don't think it is a good idea to move the Cath lab and ICU to Union. It would take an additional 50 minutes to get to Union from my home in Greene County. That takes up most of the golden hour .</p>
John Collett	Garmong Construction	<p>I am a life long resident of Terre Haute and Vigo County and I strongly support the merger of Union and Regional Hospitals. Vigo County currently has several bad rankings in various metrics. Life expectancy, adult obesity, infant mortality, and suicide rate to name a few. The Certificate of Public Advantage being sought by Union Health and Regional Hospital has the ability to profoundly improve these poor public health metrics in Terre Haute/Vigo County, simultaneously improving quality and access to services while also maintaining or lowering costs. This is important to me in my role with the Executive Team at the Terre Haute Chamber of Commerce, as well as being a life long resident of Terre Haute and Vigo County. As our community continues to make strides with our planning goals, including increasing population and income for our residents, I firmly believe this to be a step in the right direction”utilizing a creative and effective approach to remedy current barriers. I strongly support Union Health and Regional Hospital in their efforts to partner, and request that you approve of their application.</p>

Lea Anne Crooks	Ivy Tech Community College	As the Chancellor of Ivy Tech Community College of Terre Haute and Vigo County, I strongly support the approval of the Certificate of Public Advantage (COPA) sought by Union Health and Regional Hospital to improve health outcomes in West Central Indiana. My position as the Chancellor of Ivy Tech Community College with nine health programs and LPN and ASN programs, it has given me great perspective on the unique challenges and opportunities that face our community's public health. According to data from the Indiana Department of Health's (IDOH) county health scorecard, Vigo County ranks low in several key public health metrics, including 67th in life expectancy, 81st in adult obesity, 64th in infant mortality, and 62nd in suicide rate. As we look to the future, it is initiatives like the one proposed by Union Health and Regional Hospital that will ensure all individuals in West Central Indiana, regardless of age, race, gender, location, or income will receive the services they need to thrive in our communities. I appreciate the community- and state-wide efforts that led to this historic agreement of a streamlined system of care that will benefit us all in West Central Indiana, and I urge for the approval of this application.
DAVID TEMPLETON	Glas-Col, LLC	As a business leader of Terre Haute and Vigo County, I strongly support the approval of the Certificate of Public Advantage (COPA) sought by Union Health and Regional Hospital to improve health outcomes in West Central Indiana. My work as President and CEO of Glas-Col, LLC. has given me great perspective on the unique challenges and opportunities that face our community's public health. According to data from the Indiana Department of Health's (IDOH) county health scorecard, Vigo County ranks low in several key public health metrics, including 67th in life expectancy, 81st in adult obesity, 64th in infant mortality, and 62nd in suicide rate. As we look to the future, it is initiatives like the one proposed by Union Health and Regional Hospital that will ensure all individuals in West Central Indiana, regardless of age, race, gender, location, or income will receive the services they need to thrive in our communities. I appreciate the community- and state-wide efforts that led to this historic agreement of a streamlined system of care that will benefit us all in West Central Indiana, and I urge for the approval of this application.
Kristi Siples	THRH/Union Health	I do not feel that this acquisition will benefit the community. It will limit the amount of Trauma care, ICU and cardiac care to one hospital significantly lowering quality of care for our area and reducing the accessibility to many in the southern area of Vigo and surrounding counties. Many have stated that merging the two facilities will not change their decision for care locally and will now seek care outside of our area due to only having one option.

Quinn Cox	Regional Hospital	I don't support the merger between Union Health and Regional Hospital. I feel like from a resident that lives south of town my care won't be maintained well during an emergency. I feel like we will lose more people that have emergencies than need to make it to the hospital. We need to fully working hospitals and as someone who works in healthcare I feel that this is very important. I understand that there will still be a "hospital" but not everything needed will be provided like the ICU for example it will be moved to union health.
KHayne	THRH	Having only 1 major Hospital providing care to a community this size is not a good move. Diagnostic capabilities under 1 platform is a dangerous place to be when issues arise!!
Kelly Ewing	Union/Regional merger	The merger of THRH/Union hospital has led the public to think that this will have better health outcomes and overall be better for the community. I don't think that this is true. Union will be eliminating service lines on the south side of Terre Haute that citizens in Southern Indiana areas utilize. People will either take care elsewhere or not seek primary/secondary services due to the location of Union being to far away to drive and not in the best part of town. With the state of the economy the way it is for some who utilize services at Regional an extra 1/2-1 hour drive is not in the best interest of the community. It could also create a shortage of medical professionals in an already burnt out/short staffed profession, due to staff that will leave due to the thought of what Regional will become. It is my understanding that the long term goal is to expand Psychiatric services and LTAC services on the south side. How is this going to help primary care services and improve health in the community if they are only focusing on limited services? They say that they are going to invest money in Regional but most of it will be going to IT and how will this also improve the overall health of the community? I feel the state has a due diligence to help prevent this merger from taking place and encourage HCA to seek a sale with a organization that is not already established in the community.

Meredith Osburn	Wabash Valley Goodwill Industries, Inc.	<p>According to data from the Indiana Department of Health's (IDOH) county health scorecard, Vigo County ranks low in several key public health metrics, including 67th in life expectancy, 81st in adult obesity, 64th in infant mortality, and 62nd in suicide rate. The Certificate of Public Advantage being sought by Union Health and Regional Hospital has the ability to profoundly improve these poor public health metrics in Terre Haute/Vigo County, simultaneously improving quality and access to services while also maintaining or lowering costs. This is important to me in my role as President and CEO for Wabash Valley Goodwill and Terre Haute Chamber of Commerce Board Member, as well as lifetime resident, and community leader, of Terre Haute and Vigo County. As our community continues to make strides in our community planning goals, including increasing population and income for our residents, I firmly believe this to be a step in the right direction"utilizing a creative and effective approach to remedy current barriers. I strongly support Union Health and Regional Hospital in their efforts to partner, and request that you approve of their application.</p>
Cathy	Citizen	<p>I am not so much concerned about the care of patients, but I am concerned about the difficulties and confusions it may cause with billing procedures. Currently, bills are very confusing. I have even received a bill from a procedure that occurred a year ago. I have also been billed for a month then when I went to pay, I found that there was a bill from the month before that had not been mailed yet, but I was asked to pay. When paying bills by phone, it seems like the normal wait time is eight minutes. The operators are very polite, but often ask many questions about what facility the bill is from. This is difficult. I struggle to determine what doctor or visit the bill is for with each bill I receive. My insurance EOB statements used to match easily. Now, they do not and the insurance has not changed. If another facility is added, I fear it will only get worse. I would also like a choice when it comes to my health. Union Health used to offer a percentage off if the bill was paid in full. Now, the bills that I pay to Union often are not eligible for some reason. Monopolies do not offer any choices. If one is not happy with Union Health for some reason, if the merger occurs, one would have to drive much further to get the medical attention they need.</p>
ANN MILLER	MEDICAL ACCOUNTS MANAGEMENT, INC	<p>REGARDING THE PROPOSED ACQUISITION OF TERRE HAUTE REGIONAL HOSPITAL AND UNION HOSPITAL IN TERRE HAUTE. THERE IS NO ADVANTAGE TO THE PUBLIC IN THIS PROPOSED MERGER. IT WILL RESULT IN INCREASED HEALTH CARE COSTS WITHOUT ANY COMPETITION IN TOWN. NEITHER HOSPITAL IS OPERATING WELL CURRENTLY. UNION'S ADMINISTRATION DOES NOT HAVE THE COMMUNITY'S BEST INTERESTS INVOLVED WITH THIS MERGER. THEIR CEO IS NOT KNOWN FOR BEING A PEOPLE PERSON UNLESS YOU ARE IN HIS INNER CIRCLE. THERE HAVE BEEN HORRIFIC STORIES COMING OUT ABOUT INCIDENTS AT BOTH HOSPITALS REGARDING POOR HEALTHCARE.</p>

Public Citizen	Public	<p>While this proposed acquisition is more than likely already "approved" and the time for public comment is an exercise in futility for those in the community which will be affected, we implore you to strongly consider and perform on-site unannounced site visits at Union Hospital. The claims of their quality of care are subject to closer scrutiny. When they made their laboratory services "provider based", costs for laboratory services skyrocketed. When they outsourced their billing services, patients received duplicate and triplicate bills, some resulting in duplicate payments. While their quality metrics may appear good "on paper", they lack substance in day to day operations and patient care. Issues are buried and staff are ignored. To allow Union Health to be the only provider of health care for such a large area takes choices away from patients, families, and potential employees. Many will opt to leave the community. Within 5 years, the healthcare costs will have increased and the lack of competition will have taken a toll on the entire community. Both hospitals have issues, but to permit one to become the only health care provider in a community as large as Terre Haute, surrounded only by options of Critical Access Hospitals, is a disservice to the community and, we fear, continued decline in the quality of healthcare. The citizens of Terre Haute deserve more and this merger is not the answer, but will only worsen the problem. Thank you.</p>
Neil Garrison	Union Health	<p>I am excited for Union Health to move forward with the proposed acquisition with oversight by Indiana Department of Health. Doing so will retain hundreds of professional jobs, strengthen our community health focus, attract new physicians, and establish more robust service lines that will reduce the need for patients to travel to larger cities for specialized care.</p>
Troy Hauer	n/a	<p>The people of Terre Haute should have a choice in health care. If Union Health takes over TH Regional Hospital, we have no choice. I have had bad experiences at Union and have had several friends go there for routine procedures and either died or almost died. I will not go to Union. Stop this merger. Isn't there another hospital group that would like to expand into the Terre Haute market? We need competition.</p>
Roberto Bohrer	Steel Dynamics	<p>Union Hospital has been serving our community very well and will keep the excellent performance with Regional been part of the Union Group.</p>
Tammy Truelove	Union Hospital	<p>The merger is a down grade for the health of the people in Terre Haute, Indiana. It takes away from people having a choice to choose their health care services.</p>

Kate	Hca	At first I was excited bc that meant better staffing and ratios and better equipment but now , not sure. How on earth can they think closing our ICU, OB and mother baby would have ANY benefit? You need trained competent staff at BOTH places. Both of our hospitals are full on ICU, step down and med surg. OB/mother baby are FULL non stop at Union. We should keep both at both places. Also it would be a HUGE diservice to get rid of trauma at regional. We are PHENOMENAL at it .
Brad Barton	None	It's difficult to find a place to begin when commenting on the problems in the US healthcare system. The combination of overcharging hospitals, thirsty lawyers and greedy insurance companies makes for a daunting triumvirate. It is obvious that reducing competition between local hospitals is counter to the goal of providing affordable healthcare for Vigo County. That's why there was a law against it in the first place. I am against the merger of Regional and Union Hospitals. Such a merger takes away the benefits of competing hospitals to the citizens of the Wabash Valley.
Jill Bogdan	Union Health	I believe that the merger of Union Health and Regional is an exciting time and great area of opportunity for our community and improving the access to better Healthcare.
Terrie Cottrell	Hospital merger	I feel that the two hospitals should stay the way it is. I donâ€™t like that fact I am made to go to a hospital I do t like. I love reginal due to the fact I taken care of better than union
Danielle Kull	Union Health	I am strongly opposed to this merger. I am a life long resident of Vigo county and have been afforded the ability to form my opinion of this both personally and professionally. UHHG has a long history of defamating their competitors, ridiculous non compete clauses poor services and outcomes that i have no idea how are so off when it comes to reporting. Take a few to go to one of their locations for ANYTHING! i have already left the area many years ago, luckily i am able to financially. Many residents are not, we live in a poor and already saturated area of Union all over. people have the right to choose but maybe not the means to travel to do so. This decision needs to be about the residents of the community and what is best for them NOT what is best for UHHG bottom dollar. I have been following this closely for many years now and i just cant seem to make sense of how this benefits a community and or surrounding. If there needs to be a sale bring in a competing organization there are plenty around!
Heather Miles	Union Health	I think the acquisition will be good for the community. The services at Regional Hospital are declining. I worry that without some type of intervention that a sudden closure may occur, which would be devastating for our city and surrounding counties.
Shellina Shearer	HCA	HCA is for profit and pays taxes. If the acquisition is completed and becomes non-profit where does the \$10 million dollar revenue tax loss come into the picture? Is the city of Terre Haute solely relying on the casino to make up the difference?

Kristen Moore, Women's and Children's Service Line Director	Union Health	Through expanded access to care, Union Health will continue to combat OB deserts in our communities.
Ann Smith, Director of Hospital Care Management	Union Hospital	This merger will open additional opportunities for specialized care, which means more services closer to home for our communities.
Rebecca Lawson	Individual	Residents should be able to choose which medical facilities not be forced into only one hospital for the area. We need competition to police costs and we should be afforded opportunity to choose not be forced into one big conglomerate Please do not approve the merger of Union and Regional. Union is too big now and service is deplorable !!
David Delaney	Private Retired Citizen	Consolidation of Union and Regional should be allowed. In markets the size of Terre Haute, supporting two hospitals is often not efficient. The inefficient aspect creates higher fixed overhead, bricks and mortar and operational/administrative, and inefficient use of medical equipment and information technology. Private market competition for ambulatory services will assist in maintaining an accountable and fair pricing structure for most non inpatient services.
Josh Alsip	Terre Haute Chamber of Commerce	As a Director of Community Engagement at the Terre Haute Chamber of Commerce, I strongly support the approval of the Certificate of Public Advantage (COPA) sought by Union Health and Regional Hospital to improve health outcomes in West Central Indiana. My work with the See You In Terre Haute Community Plan has given me great perspective on the unique challenges and opportunities that face our community's public health. Vigo County ranks low in several key public health metrics, including 67th in life expectancy, 81st in adult obesity, 64th in infant mortality, and 62nd in suicide rate. As we look to increase our population and per capita income, it is initiatives like the one proposed by Union Health and Regional Hospital that will ensure all individuals in West Central Indiana, regardless of age, race, gender, location, or income will receive the services they need to thrive in our communities. I appreciate the community and state-wide efforts that led to this historic agreement of a streamlined system of care that will benefit us all in West Central Indiana, and I urge for the approval of this application.

Tiffany Baker	3 Sisters Investments	<p>According to data from the Indiana Department of Health's (IDOH) county health scorecard, Vigo County ranks low in several key public health metrics, including 67th in life expectancy, 81st in adult obesity, 64th in infant mortality, and 62nd in suicide rate. The Certificate of Public Advantage being sought by Union Health and Regional Hospital has the ability to profoundly improve these poor public health metrics in Terre Haute/Vigo County, simultaneously improving quality and access to services while also maintaining or lowering costs. This is important to me in my role as owner of 3 Sisters Investments, a real estate investment company in Terre Haute, and as a resident and mother of three young children in Terre Haute and Vigo County. As our community continues to make strides in our community planning goals, including increasing population and income for our residents, I firmly believe this to be a step in the right direction"utilizing a creative and effective approach to remedy current barriers. I strongly support Union Health and Regional Hospital in their efforts to partner, and request that you approve of their application.</p>
Susan Marks	Private	<p>I strongly disagree with the COPA. As a long time resident and Registered Nurse in Vigo and Clay County I firmly believe it is creating a monopoly in the community and people will have no choice. Alternative care is over 60 miles away. Union has had a presence in this community for over 125 years. They do not reinvest in their system and over pay the CEO, Steve Holman. With a salary of over 1.5 million, some of those funds could be better utilized to truly make an impact in the health of the community. They should focus on improving operations within their own entity before biting off more than they can handle. Their main reason for this COPA is so no other entity (IU, Community Hosp. or St. Vinc.) comes into this community and challenges them. This is their way to remove any competition in the community. We need competition in this community to keep both hospitals on their toes. I do not recommend approval of this application.</p>
Julie Leek	Regional hospital merger	<p>As an employer of Regional Hospital. I have had so many pts against this merger</p>
Shellina Shearer	HCA	<p>It's my understanding that the Federal Trade Commission prohibits a company to monopolize trade. The acquisition between Union and Terre Haute Regional creates a monopoly in Terre Haute by eliminating competition from the market. There are three federal laws that have passed to prevent monopolies. They include The Sherman Act, the Federal Trade Commission Act and the Clayton Act. Based on these truths, how can the acquisition be allowed? The FTC enforces consumer protection laws that prevent fraud deception which ultimately leads to higher prices and fewer choices. I sincerely hope that this application is being evaluated in it's entirety.</p>
Christina Crist	Team of Mercy, Inc.	<p>We are very grateful to have such wonderful healthcare facilities in Vigo County</p>

Robert A Coons	Rose-Hulman Institute of Technology	As Chair of the Union Health System Board of Directors, I would share that the merger is consistent with our mission of providing compassionate care of the highest quality and our vision to lead the Wabash Valley communities to their best health and wellness. Ongoing, thoughtful evaluation of the merger by leadership and management indicates there is opportunity to increase access to care by expanding programs, including primary care, rural care initiatives, and behavioral health services. In addition, the poor health outcomes in the Wabash Valley (out of 92 Indiana counties, here are our ranks: Vigo/63, Clay/55, Greene/64, Parke/34, Sullivan 60, and Vermillion 66th) indicate it's time to take a novel approach"such as the merger"in addressing the health challenges faced by our community.
Ruth Johnson	individual comment	I do not think Union acquiring Regional is a good idea. I have noticed an increase in prices when Union has taken over some other things such as blood work at Thomas Plaza. k at Thomas Plaza. It would also make it a lot farther to an ER for many people. I keep hearing complaints about the care being received at Union and feel this will be a worse problem if they merge with Regional. I have had a lot of trouble getting in contact with the doctors, especially the hospitalist, at Union. How would this improve if the hospitals merge? It would then be a monopoly.
Dan Watson	Self	This is very bad for our community Union Hospital has been mis managed for years and now we have no choice but to go to Indianapolis for quality health care
Zachary Worley	Terre Haute Regional Hospital	I believe it is in the best interests of Vigo County for the Union Hospital and Regional Hospital merger to go forward.
Anne Bowen	Apex Benefits	As a long-time resident and community leader of Terre Haute and Vigo County, I strongly support the approval of the Certificate of Public Advantage (COPA) sought by Union Health and Regional Hospital to improve health outcomes in West Central Indiana. My work as an employee benefits strategist and the Director of Client Experience of Apex Benefits has given me great perspective on the unique challenges and opportunities that face our community's public health. According to data from the Indiana Department of Health's (IDOH) county health scorecard, Vigo County ranks low in several key public health metrics, including 67th in life expectancy, 81st in adult obesity, 64th in infant mortality, and 62nd in suicide rate. As we look to the future, it is initiatives like the one proposed by Union Health and Regional Hospital that will ensure all individuals in West Central Indiana, regardless of age, race, gender, location, or income will receive the services they need to thrive in our communities. I appreciate the community- and statewide efforts that led to this historic agreement of a streamlined system of care that will benefit us all in West Central Indiana, and I urge for the approval of this application. Thank you!

Terry Warren	Valley Professionals Community Health Center	Iâ€™m a huge supporter of the Union Health acquiring Regional Hospital. As long as I can remember, Regional has been for sale. I donâ€™t see the owners of Regional investing additionally resources to the community, which I know Union will.
Joanne Davignon, System Director HR Operationa l Performan ce	Union Health	Thank you for supporting this! No layoffs and more localized jobs. Itâ€™s a win-win
Patrick Voll	Local Citizen	Has anyone talked about the loss of local property taxes as Regional Hospital was a for profit hospital and Union Hospital is a Not For Profit Hospital and they don't pay property taxes. Thanks for listening
Gale Wilson	Union Health	Thank you for supporting Union Healthâ€™s goals of expanding services to meet the needs of our community.

Kathleen Stienstra, MD
Kathleen Stienstra, MD
PC writing about purchase of Terre Haute Regional Hospital by Union Hospital

I am a physician in private practice in Terre Haute IN. I am writing to give my perspective and feedback about the request for Union Hospital to purchase Terre Haute Regional Hospital and the physician practices associated with Regional. My personal background "I worked for Union Hospital as a Family Medicine Residency faculty from 1991-2010 and have been in private practice since. I am a firm believer that competition breeds excellence and is always better for the consumer so I would be sad to no longer have a choice for hospital and medical services in our community on that basis alone. In the past decade, I have seen a marked change in the way that services at Union are provided and I don't think for the better. I am concerned that a lack of alternative in the community, ie a monopoly will lead to further deterioration in services and in timely delivery of services. Prior to the current administration at Union, the provision of regional medical services was an impressive collection of well trained and motivated physicians within a variety of specialties-far more than a community of our size would normally have. This was important as we serve as the referral center for many of the surrounding rural counties, both in Indiana and eastern Illinois. The partnership between hospital administration and physicians was mutually respectful. Physicians managed their offices with administrative support if they were a hospital practice but had hiring and firing say and a lot of say over their schedules. Medical input from physician committees in the hospital was frequent and important. Most primary care physicians provided inpatient care for their own patients. Medicine has changed. The addition of hospitalists initially seemed like it was going to be a great idea. Primary care physicians could choose to have their inpatients managed by docs who would be in the hospital all the time-responsive and able to examine folks quickly when their condition changed. The first hospitalists at Union hospital were local doctors that were competent and well trusted by the medical community. They covered ER and inpatient patients and the disruption in the lives of primary care docs improved significantly. However that has now evolved to a group of contracted hospitalists who are understaffed with a lot of turnover. Nurse practitioners play a prominent role in this hospital care and are assigned to some of my most complicated patients. An off site physician remotely interacts with the NP and patient. At nighttime, there is one hospitalist for the entire hospital and he/she doesn't work up new patients and is not really even available for knowledgeable discussions with me about my hospitalized patients. One well liked hospitalist was fired for taking too long with patients. Patients complain bitterly about poor communication and inattentive nursing care. Many have left the community for systems that hold a better reputation for care--Horizon Health in Paris, Illinois and Hendrich County. Doctors have left in droves, some quite abruptly as working for Union as a physician has become an unpleasant experience. The scheduling for hospital and doctor's offices was changed to a central call center with standardized guidelines for scheduling. Primary care doctors were told--"you will see 6 patients an hour." Schedulers were separate from the office for which they were scheduling with no insight in terms of what was happening in the office on a given day or the complexities of patient needs for what amount of time. For example, Dr Micah Thompson-a Terre Haute native and long time respected family physician left and now practices for Horizon Health in Paris. We are down to one gastroenterologist as all but one doc who would love to retire have left. We are down to one urologist as docs weren't willing to deal with Union's style of management. We have no physician endocrinologist. We are down to one rheumatologist, and so on. Wait times for imaging services has become a significant problem. MRIs, CT scans, PFTs, echocardiograms, nonstat venous dopplers all take at least 7-10 days and often weeks to schedule. When I have called to schedule an outpatient abdominal CT for a patient of mine with a probable kidney stone or diverticulitis on the weekends, I am told by the receptionist in radiology that she isn't allowed to schedule and hasn't been trained to do so but that unfortunately the call center which does do that scheduling isn't open on the weekend. The only choice is for the person to go to the ER if they need

imaging on the weekend. The ER has taken to evaluating a person and then sitting them back in the waiting room for hours at time sometimes awaiting results or the ability to see a provider--no monitoring provided and of course exposure to all the contagious illnesses people bring into the waiting room. I've had people who came to the ER for evaluation of chest pain, leave after sitting in the ER a couple hours. For those requested weekend CTs, I then called Regional's radiology dept. They connected me to the CT tech, who said-sure send them in. I worry about what it will be like when Regional's ER and radiology department is no longer an alternative. There was a recent editorial in the ISMA newsletter by Dr Richard Gunderman's "The Mismatch at the Root of Burnout". His point was that there are 2 theories that physicians and Managers have in terms of worker motivation. Theory X presumes that people prefer not to work. In medicine this would mean that most physicians would prefer to not come to work, see pts, formulate diagnoses, prescribe treatments, perform procedures or exert themselves in any way. The presumption is that the only way to get physicians to work is to manipulate them-threaten disincentives or incentivize with bonuses etc. Managers need to rigorously define goals, monitor performance and enforce standards or good patient care will not occur. Docs are not to be trusted. Managers need to micromanage staff or performance will decline. Theory Y assumes that physicians bear an intrinsic motivation to work and sincerely enjoy caring for patients. They get up and come to work because they want to. Caring for patients in an important life mission and they relish the opportunity to make a difference in their patients; lives. They have an intrinsic love of excellence. To be sure, they make mistakes sometimes but they are trying to do their best for their patients because they genuinely care and find fulfillment in helping them stay healthy, recover and thrive. Burnout can be traced to Theory X management of Theory Y medical professionals. Union Health's management appears to be firmly in the Theory X camp and Theory Y professionals are leaving. I certainly would have. I have never been more relieved and happy to be in a private practice. I remain on staff at Union for outpatient orders etc. I do not share Union's medical records but have an independent system at my office. Despite many calls with the IT department, I still have difficulty receiving reports on outpatient procedures like echoes, etc. It has not been a pretty picture. To put all of the community's medical options into one basket, one that, in my opinion, has been the cause for a loss of many specialist and primary care physicians would not be in our best interest. Many of us were hoping that Horizon Health from Paris Illinois would purchase Regional and expand more fully into our area. They now have a building in Terre Haute that houses Union's previous multidisciplinary pain management team and also some primary care. I hope this input is helpful

Kathleen Stienstra, MD

PATSY HUGHES	Private Individual	<p>A merger of Union Hospital and Regional Hospital is not a good thing for patients and will not solve the problem of many individuals not seeking medical care. Union is not well organized now. Wings are closed due to lack of help. Patients lay on a guernsey in the hall at the ER waiting hours to be seen or a bed if being admitted. Sometimes after finally being seen in the ER, are sent home with no diagnosis. Sometimes the patient's reason for coming to the ER is not even addressed. Often times patients spend unnecessary time in the ICU due to no other beds being available since wings are closed. The ICU is more expensive. If Union can't run their hospital better than that now, how are they going to make things better acquiring another hospital? Personnel at Union are unfriendly and lack compassion and dedication to their profession. The opposite is true at Regional. Doctors and nurses smile and speak to you just passing in the hall. Since Union says IN health is so bad, think of the real reasons why---cost of hospital stays, doctors' visits, prescription costs, health insurance prices. How can you afford health care? There are plenty of health care facilities and doctors' offices. Prices are the reason! Union has been more concerned about being bigger and bigger and making headlines than about patient care. People in the Wabash Valley should have a choice of hospitals. All of Union's reasons for merging are rhetoric. They see a hospital (Regional) operating well in their area, and they want to crush them eliminating good competition. People in authority need to visit Union unannounced and actually see how it's operating---check the ER functioning! Don't just visit once. Visit many times. See if you want to be a patient in Union. I have been a patient in both hospitals. I never want to be a patient in Union again! Don't just "okay" this merger. Research and see if this is good for the community. Prices will increase if Union becomes the only hospital.</p>
Rene Foli	First amendment.	<p>It's a monopoly. Not only just 1 hospital, but one insurance. There is no choice involved. It's Union or Union. No good!!!!</p>
Rayetta Gillaspy	Union Health	<p>Thank you IDOH for allowing Union Health to continue improving health outcomes in the Wabash Valley!</p>

Wanda Jeanne Michaels	retired	I am writing to express my thoughts and concerns about the proposed merger between Union Hospital and Terre Haute Regional Hospital, and I am hoping that you are still accepting public comments. I believe I may also be speaking for several others who may not have had the opportunity to submit their comments. In general, I have learned in my 70 years of living that competition in business leads to better outcomes and quality of service. Without competition there is little incentive for improvement. This is true in any business including health care. With health care, however, we are of course dealing with people's lives. The people of Terre Haute have been making their choice of the two available hospitals based on this healthy competition, and it is my concern that if there is a merging of the 2 hospital systems that eventually quality of care will suffer, as again there is no incentive for improvement. There is little likelihood that a merger would improve health outcomes or quality of care, in fact it is likely that without the competition that is currently present a merger would result in just the opposite conditions.
Mary Pell Abernathy, MD	Union Hospital Terre Haute	We appreciate the opportunity to further support an alignment with the IDOH and all the positive things it can and will do for our community. We think the acquisition of Regional Hospital will be beneficial for mothers and infants in the Wabash Valley.
Tiffany Bennett	Union Health	The end goal is to improve the health and wellness of our families, friends and neighbors. This merger will allow us to not only expand access to quality care but thrive as a community. Thank you for your support!
Mary Payne	TH Regional Hospital merge with Union hospital.	How can this merge be beneficial to Terre Haute. Regional is a big property tax paying business. Union is non for profit will now have ANOTHER large piece of property they are not paying taxes, just add this to all of their other property.
William Carls	None	It's extremely important that the public have a choice in health care. Competition is good for all concerned.
Amy Pryor	Citizen	This is so not a good idea I have spoke with so many people about this and all are saying they will start going to Indy for health care ! Union has rude staff and no one really cares enough to stand up for the little guy ! To bad the people cant vote for this
J.R. Frederick	Concerned patient	This merger will only drive up costs for consumers. My EEG used to cost \$20 at my neurologist's office a block from Union Hospital. Last time, it was moved to the hospital without telling me until I arrived at 10x the cost to me. Once Regiobal is out of the picture and Union has its monopoly, costs will continue to skyrocket and I will be looking to doctor elsewhere.

Dale Beverly	Self	Union Hospital can't staff enough Doctors and Nurses now to keep one hospital open. How are they planning on staffing two hospitals and have them both run efficiently. The medical system needs completely overhauled right now. During COVID the hospital got rid of several nurses and Doctors who wouldn't comply with the job and now the staff that is there is overwhelmed with patients and paperwork. A one size fits all for a county hospital system is not the way to go.
Mr. Jerome Shouse	Indiana Patriot Guard Riders Inc.	..
Tay	N/A	As a community member in Terre Haute, I do not support the merger between union and regional. It creates a monopoly and takes choice away from the patient.
Butch	Na	I am against the merger of Union and Regional hospital. I feel this would be a monopoly. Moving most services to the north side of Terre Haute is a hardship for those who live south of the city in surrounding rural areas. We need someone to purchase the hospital that would improve the facility and be competitive. Regional hospital has a higher rating than Union. There is no way Union has enough beds to accommodate the population of the area. My experience has been better care from Regional hospital. I think this would be a disservice to the community and hope the COPA is denied.
James Robertson	Hope Crisis Response Team	I believe this merger will be bad for Vigo county simply because we only have 2 hospitals now and two behavioral health hospitals not including the upstairs of Regional. Instead of a merger with hospitals we need to be looking at more behavioral health centers and how to help those dealing with mental health. Citizens of Vigo county deserve to have choices when it comes to medical emergencies. The staff at Regional are so much nicer and care more than union and the wait times are not near as long. Mental health should be Vigo county main concern right now.
Meredith Jaye Addison	Volunteer Emergency Nurses Association	I have been working and praying for over 45 years for health to be about care and trust. The system in the Wabash Valley has been set up "us against them" ever since I can remember, with the patient caught in the middle. I think it is high time we all play nice together and help folks get the care they need and deserve for best health.
H Osborne	Union hospital	Monopoly should be just a board game. Not a healthcare system. Not good for patients or employees.

Daniel Armstrong	Self	I am very concerned about this merger for several reasons. Union Health does not have a good record for good health care in our community. Studies have proven that hospital mergers in communities result in higher healthcare costs, and lower levels of healthcare effectiveness. The people should have an option of what place they want to receive healthcare from. Union health is also publicly not financially stable, nor do they make good financial decisions, which could ultimately lead to the closing of some of the facilities within the community, which reduces the options for the people. This is a terrible idea to allow this merger to go through.
Kimberly Worland	Self	I'm totally against the merger between Union Hospital and Regional
James Worland	100 percent disabled veteran	Please do not let Union merge with regional hospital. Union hospital is a mess and can't take care of their own patients. I travel an hour away just for care.
Shari Morgan	NA	Having 2 options is better for the community. I have used both facilities based on the strength of various services. Example: Union OBGYN services. THRH Imaging and Oncology services. Do not take away healthcare options from Vigo Co. Thank you
Shellina Shearer	Consumer	I have looked at the application at great length and found discrepancies. Their application says that Regional doesn't offer dialysis which is untrue. We have bedside dialysis and a dialysis unit on third floor. It also says that we don't offer ambulatory surgery. Our outpatient surgery department has 36 rooms next to our endoscopy suite. The same physicians that do outpatient surgery at Union do them at Regional. The spokesman for Union keeps talking about how unhealthy the community is. They employ primary care physicians. Regional hospital does not, so merging with Regional Hospital based on that statement does not improve outcomes. Union has the monopoly on primary care and obviously hasn't been effective or the numbers would be better.
Sondra Leturgez	Individual	I have dealt with Union Hospital Group many times over the years and not impressed at all and consider it minimal care. I have pulled both my parents out of their care before over the years and taken them to Bloomington or Regional. I, myself, will now only go to Regional and when I had my possible Tia their emergency room was very prompt and thorough with my care. I fear where I would go now as I would have to travel to Horizon Health in Illinois or Indianapolis to get proper care. I know people who have died at Union because their care wasn't expedient. It took them 45 mins in the ER to get my 90 year old mother off a bed pad at my assistance and my cousin had to wait in the ER waiting room while having a heart attack. I literally fear for our lives locally if the merger takes place with Union as their care is very subpar.

John Simmons	My Family, Citizen of Vigo County	With the understanding that "Regional Hospital" (Union Hospital, South Campus) remains open to treat patients, and it continues to operate as a fully functioning hospital, This is a great move for Terre Haute & Vigo County. Individuals that are concerned with a "Second Opinion" for a diagnosis would typically refer to a physician with credentials at an Indianapolis based hospital (Methodist, St Vincent, Riley, Etc.) like many currently do. My opinion, Let the merger happen, it will be good for the community..
Scott Reece	Resident Vigo County	After experiencing terrible care and the worst and deceptive billing practices I have taken all my medical needs away from Union hospital. We can't remove Terre Haute s only alternative to be under our worst possible organization. We need a better choice or alternative.
Beverly Merritt Hicks	Individual	I am very concerned about this merge. I don't want to be limited on options and prefer to go to Regional. Union has slowly taken over in this town and it leaves residents with no choice.
Name Named	HCA HEALTHCARE /TERRE HAUTE REGIONAL HOSPITAL	Regional hospita employee l Copa deal, will lead to us regional employees loosing our jobs or reduced to union health's infomous part time A&B CONCEPT WHICH STRIPS YOUR BENEFITS AND KEEPS YOU WORKING 5 PLUS DAYS A WEEK BUT UNDER 40 HOURS PER WEEK I KNOW I WORKED FOR UNION HEALTH BEFORE THEY ARE CROOKS
Blasberg	Health Office	For over ten years I have had a health condition that union refused to treat due to it being a rare disease regional picked up the slack because it was life threatening and has been treating it. Since the merger Iâ€™ve had to go to Indy for emergency events because union intentionally manipulated insurance to charge more for care and diagnoses patients already have and have had most of their lives. A monopoly in health care would mean Vigo county would be held responsible for emergency costs to transport to Indy. This would not only affect the piss poor health most of the community has but death rates and more of the population moving away which has been the main cause of my entire family moving out of Terre haute. They intentionally diagnose conditions and unnecessarily refer patients around to milk insurance vs giving them the meds.

Debi Rickard	Self	<p>Union Health is in no way ready competent to add more responsibility to their plate. If they want to truly make Vigo county a healthier place then they should start in their own back yard. Updated software used needs much improvement. All doctors in the Union Health group should be able to see the patients complete record. Including all reports from other doctors also in the group, that care for that patient. Union doesn't want to better our healthcare. They want to be at the top with real estate. The more you own the more you are worth. Every member of my family that has gotten treatment at Union, received poor medical care. (My 87 yr old mother over dosed on a 50 mcg fentanyl patch, ordered by a "hospitalist" for her back pain.) We will not see any savings, even though Union will. Those savings will go right into the pockets of board members and others. Not spent on new software or more programs pointed towards the ones that need it most. NOT the ones on medicare or medicaid. It's the ones that have enough income to be over the limit for government help. The working poor, which Vigo county has high percentage of. Help those people. Buying another hospital will not make residents lives better. It surely will make Union Health lots more money, that will not make it into our lives. I do NOT want this merger to happen.</p>
Merri Daniel	concerned citizen	<p>I don't think that Union and Regional should merge because then lot of people will have to go to Indy or Paris, IL so see a doctor. I know alot of people that won't go to Union. I have always been a Regional pt. so I will have to go else where for my healthcare.</p>
Heidi Grim	Union Health	<p>Union Health has initiated several partnerships like the one we have with Vigo County School Corporation that helps to reduce childhood obesity and food insecurity. COPA will allow us to continue additional partnerships to improve community health needs!</p>
Gary L. Isle	Two Retired citizens of Terre Haute,In. community concerns	<p>Me and my Wife live in this Terre Haute area and have utilized both Regional and Union Hospitals during our eighty years of living here.We have concerns that a merger would limiit having a monopoly situation as well as the chance to get a second opion with another Hospital in oour area,without going to Indianapolis.What has happened to our FCC about corner on the market mergers and etc?</p>
Kristie L Auler	None	<p>I don't think that they should merge</p>
Rene Foli	Personal opinion	<p>This merger will produce a monopoly. WE don't need that in Terre Haute</p>

Drh	N/A	<p>I am opposed to the merger of Union and Regional hospital for the following reasons: 1. There would be a monopoly. There would only one option for healthcare and healthcare workers wouldn't have employment options unless they went to Indianapolis,Vincennes or Illinois. 2. Their plan is to move most of patient services such as cardiology,surgery and ICU to the Union facility. This would be a great hardship for patients who live in rural areas and towns south of Terre Haute. 3. Taxes would be increased since the taxes currently paid by Regional hospital would be discontinued (Union hospital doesn't contribute taxes to the community since it is nonprofit). Resulting in higher taxes. The community would be better served by another facility acquiring Regional Hospital. The Union facility can not provide enough beds for all the patients that will have to go there. There is already a long wait to get scans scheduled. Most of the people I have talked to are not in favor of this and hope the COPA is denied. Thank you considering the public's concerns in your decision!</p>
Russell Rutter	Union Hospital	<p>Me and my family are holding are breath waiting for this merger to be stopped. The level of care for lgbt+ patients or people who suffer from severe mental health issues is of the front of my mind when reading about this. I already have to drive to the other side of town passing the closest hospital to get to the other so that I can avoid the unjust treatment of from staff in the ER. Someone who is going thru the worse day of there life shouldn't have to fight with nurses to talk to the doctor or deal with staff openly gossiping about patients with little concerns for the patients privacy.</p>
Alicia Albert	N/A	<p>Without competition to do better than one another for their patients, and without a choice for consumers, I cannot see how this merger could ever better our local healthcare, which is already not serving us very well.</p>
Susan Modesitt	COPA	<p>I find it concerning that representative Jon Ford initiated the COPA with Union health and has since resigned from public office. The Republican led Indiana legislature needs to give patients a CHOICE , something they don't like to do</p>
Karen Mullenix	Union Health	<p>Thank you for your support as this merger will allow us to expand access to quality care through innovation and modernization.</p>
Rene Anthony Foli	Retired	<p>It will never be the sarre here in . Once you have a monoplpy that is it. That's what Union wants. It's not goodTerre Haute if Union takes over Regional</p>
Michael A. McNabb	none	<p>I do not go to any of union hospital or any of it's affiliated clinc's and centers. The administration interferes by telling doctors how long they can spend with a patient and how many issues can be addressed in one visit . This is why they lose many doctors and nurse's . I also base this on care my mother received while at union hospital and what I noticed while working for a outside contractor on a maintenance crew there . When I talked to my state rep around 2013 , He told me this was a know fact at the state house the problem was the Administration at the Hospital .</p>

Sonya Wright	Personal	All the Hospitals in the world dont matter when there are no Doctors to care for patients. There is a ridiculous Doctor shortage in this area causing a health crisis!
Kenneth Huskey	Na	Union Hospital is awful. They push unnecessary surgeries, neglect patients, and make the wrong diagnosis frequently. They kept my son in there for a week, no food, only IV fluids, and only when we saidcwe wanted him transferred to riley CH, did they stsrt to do snything. They wanted to do exploratory surgery. Pulled him out and drove him to Riley myself and he was treated and released in 16 hours. They refused to release his records to riley. Attempted to intimidate me about the bill, which was covered. We've lost 2 babies, and almost lost 2 there in the past because they don't listen to the patient.
Mike Mullins	Union Health System	When people thrive, so does everything else around them. This merger has the potential to not only improve health care, but education, business and infrastructure. Thank you for supporting this!
Amy Ennen	Union Health System	History can speak for Union Healthâ€™s commitment to the health of the Wabash Valley. We appreciate the opportunity to further support an alignment with Indiana Department of Health.
CH	NA	As a healthcare worker I am concerned with this merger for several reason: 1. I am concerned that the job options will lesson for healthcare employees in this area as we will just have one option for a employer unless we travel. 2. I am concerned that after 5 years that prices will go up in healthcare for our community. I know that they are watched for a short time but after that you are taking their word alone that they will not raise healthcare. We have a poorer community and I am concerned that healthcare cost will raise and be very bad for people in our area.. 3. HCA pays a lot of taxes to our community and again taking those taxes away will hurt our town in the long run. 4. It will be a hard ship for our little surrounding farm towns in the South to travel all the way up North for most services since in their outlined plan it states they are moving most things to Union Hospital. 5. Has anyone checked to see what insurance Union takes? What if they don't take a persons insuranceyou do not have a second option. I am not opposed to selling HCA, I just think we are a big enough community to have to different options and they should sell to a different company to not have a monopoly. Being a monopoly does not allow competition to have good healthcare. I am concerned that healthcare will decline. Also I feel sorry for the private practice Drs. They are not apart of this and will suffer in the long run.
Leah Salvador	Union Health	As a Service Line Director at Union Health, supporting the COPA allows us to continue improving access to care in the Wabash Valley. I appreciate IDOH allowing the opportunity to provide feedback. Thank you.

Jimmy McKanna	Union Health	<p>The following comments are in reference to the COPA agreement between Union Health and the Indiana State Department of Health: Disjointed healthcare is a disservice to the community members of Terre Haute and Vigo County. For far too long, there have been very little collaboration between the healthcare facilities, government healthcare agencies and private healthcare establishments in Vigo County. We have many good projects, opportunities, and skilled healthcare workers, but without collaboration we fail our community. Vigo County is my home! Unfortunately, the health of my county ranks among the lowest in the state. I believe this is a product of wasteful spending on disjointed initiatives. The Union Health/Regional Hospital competition has always been very evident in our community and our community members have suffered. With specific care in only one system, primary care offices without EMR links to the hospital, and outside providers using different electronic medical records (EMR) the burden falls on our community members. They need to be their own advocates and relay their complex medical history between providers because there is no EMR continuity. This is a very dangerous situation. It also causes redundancy in testing and more money out of the pockets for our community members to seek a continuum of care between specialty physicians. With a central EMR for the community members using Union Health and Regional Hospital, all the records will be available to every provider within the network. There are not many communities that have this type of continuity of care. I believe this is the innovative thinking that is needed to put Vigo County and its residents on the Indiana map as "most improved in overall health" rather than one the least healthy counties in the state. I™m support the COPA agreement with Union Health and the Indiana State Department of Health. We need to try something different because the status quo is failing our fellow Hoosiers.</p>
Frank Rush	none	<p>I am not in favor of the merger of Union Hospital and Regional Hospital in Terre Haute, i believe that competition is very important and that having one health care provider is not in the best interest of our community. I think this will make more people travel out of market for their health care.</p>
Carla Rogers	Self	<p>I don™t believe The merge will help. I know there™s a shortage on staff has been for years. If you can™t keep the kitchen open because of short staff how are you going to staff another hospital. If you need to see a specialist you have to go to Indy. We don™t have electrophysiologist., Only a couple of neurologists and One endocrinologist. Sad to know all that money to build a hospital and 5 to 1 nurse per patient is dangerous . As a housekeeper help making call when a code happens is proof , that money overrides the safety of the care people are getting.</p>
Dawn Jolliff	Union Health	<p>Thanks to the Indiana Department of Health for recognizing the many benefits created by this merger and supporting the increased growth and access to care opportunities.</p>

Molly Moulton	Vigo County School Corporation	I do not want there to be a merger of Union and Regional. We can not afford to loose all the beds at Regional, there are not enough beds in Terre Haute as it is.
Betty Gilliam	Self	Much better emergency care. Workers are more congenial and caring
Lori Combs	Union Health	I am very glad they are merging the hospitals. I have worked for Union in the past and know first hand they need another location to pull some of the heat off the hospital. It is overwhelmed with patients. When you have to many patients and not enough room or staff it creates a lot of problems. Union needs another location to help with over crowded conditions. Patients should not have to wait 3 days in the ER for a room. Also Regional has an excellent drug and mental health floor I hope Union continues with. We have a huge problem with addicts and mental health. Thank you.
Craig Banta	NA	I also have Great concerns about the merger between Union/Regional Hospitals. For one, patients rights should not be limited in any way especially when it comes to professional & proper health care. Second, it's my understanding that due to medical necessity in Indiana, patients are NOT given a ride back home in an ambulance unless you need oxygen or cardiac, heart related care. This is total B.S. in my opinion. All patients who are taken to the hospital by ambulance should be taken home by ambulance. Period. Among other things, the more variety and options you have, the better your chances are of getting the appropriate health care. A MONOPOLY is NEVER a good thing. Hopefully Union and Regional won't merge but if it does, like a wise person told me long ago: Follow the wallet. Pathetic and sad but true. Please do not take away other people's options on healthcare, this is a gamble that many, especially poor people will lose. At the end of the day, everybody agould have the choice to go to union or regional. When a monopoly takes place, that is the beginning of the end of fair and professional treatment to all who need it.
Maxine Writtenho use	Why Iâ€™m not organization	I have had nothing but good and great people helping me at union so maybe there is more to the story
NO MERGER	Union Hospital Terre Haute	Stop the merger. Union hospital is dangerous. Making this a one hospital town will be bad for patients in this area. Combining the hospitals will not help with staffing issues, resident doctors neglecting patients, patients not being sent to the proper acuity floors, etc. This merger cannot happen. People will continue to die. It has got to end. Union should not even be able to operate the way it is now but no one listens to the people who work there. REGIONAL AND UNION MUST STAY SEPARATED. Union is a sinking ship. They are greedy and worried about growth and money. Zero part of that â€œnotâ€ for profit organization is about patient safety and making people better. Get the stats on readmits within 30 days. Why are they so high? Ask yourselfâ€ if they cared about patients why are they sending them home still sick just to end up back at the hospital?! END THE MERGER.

Patty Miklozek	Vigo County Resident	Please don't allow a monopoly on health care in our area. Union Hospital is extremely difficult to deal with. I've been billed for drugs administered during a preventative colonoscopy because they were coded incorrectly as diagnostic. I've spent countless hours on the phone getting referred to the Dr office, insurance and multiple departments at Union. I was finally referred to a patient advocate at Union. They insured me they put a note on my account that it was being resubmitted with a preventative code a week ago and I wouldn't be billed yet I received another bill and when I checked my insurance no new claim is in the system.
Brock Marietta	Local firefighter	A monopoly on healthcare is not good for our community.
Justin T Shorter	Katy ISD	Regional needs to stay independent of Union. Their ICU is top notch for patients and family. Union turns patients away all the time.
BERNIE ANDERSON	PRIVATE CITIZEN	I AM VERY MUCH AGAINST THE MERGER OF THE HOSPITALS. I LIVE IN THE SOUTH END OF TOWN AND IF I HAVE AN EMERGENCY GOING TO UNION ADDS AN EXTRA 10 MINUTES TO GET HELP. ALL MY DOCTORS ARE ON STAFF AT REGIONAL AND THE QUALITY OF CARE CAN'T BE TOPPED.
Arlene Shorter	individual	would hate for TH to lose Regional's excellent ICU > excellent arrangement for monitoring patients, large family waiting area, outstanding professional care
Arlene Shorter	individual	My husband went to Regional ICU in December or 2022 because Union's was full. Earlier in 2022 he spent 17 hours in Union's ER waiting for a room
Mary McLaughlin	n/a	I believe the merger of Union Hospital and Regional Hospital is a good thing that will benefit our community. Regional is a "for profit" hospital, owned by HCA located in Nashville, TN, with profits going there instead of staying in Terre Haute. Union is a "not for profit" hospital with strict regulations on profitability and community improvement. Regional Hospital has been up for sale, and I think it's better that Union take ownership rather than some out of the area "for profit" hospital. I don't think prices will go up, as there are state regulations preventing that.
Valarie A Jones	None	Let Union buy Regional--at least Union has a vested interest in the community whereas another corporate hospital does not. If HCA has it up for sale, it will be sold to someone.
Micheal Desue	Union n regional	I don't think it's a good plan how is Union doing this there buying apartments n everything I'm like Mr Decker union has short staff 17 patients to one pct I don't agree with union hospital at all let regional stay regional n don't let union hospital take over take care of u patients n ur employees
Sherry	Self	He is right. It will be a medical monopoly.

ROGER BROWN	Disabled	I think the merger between Union hospital and Regional hospital in Terre Haute should not go through. I have gone to union hospital several times over the last 20 plus years I have either left there worse than I went in or they try to kill me and I'm not joking I'm very serious. I have the proof to show whoever questions my saying this. I went in there with pneumonia and 2015 and I ended up in ICU the next day is not in the record I was in ICU for 3 days after going in on Tuesday I went back to my room twice the first time it didn't work second time it finally worked but that was because I was finally awake. Anyhow I was in the hospital for pneumonia in 2006 I slipped in my own urine and broke my back they got away with that one too everything would be better if they don't get to merge with Regional hospital because if I have to go out of town to go to the hospital that's going to be a real inconvenience because I'm disabled and I can't just go anywhere I want. Please for the good of the community stop this merger.
Lynn	Union Health	I do not think the merger of Union Health and Regional is a good idea. Union health currently struggles financially, maintaining employees, unable to provide needing staffing and resources to offer quality of care. Taking on another facility will only compound these issues. Reimbursement is a huge part of this issue. However, taking over another facility is not the answer.
Linda Lumsdon	None	Such a mistake is this merger is allowed. (It will take away the choice of which hospital a patient can choose (not all care is provided if merged (preferred doctors your health insurance will accept (location will be too far for those living in the south end of Terre Haute, or even farther outside of Terre Haute (access to Union takes much more time to get to the hospital. Roads are in terrible condition & the problems trains making even longer to get to Union. This creates a monopoly which should not be allowed per our laws. It's been said there will be a job for everyone, this is not true. This is a true statement because I'm aware of because this happened to one of my friends
Timothy Wood	Liza's Angels daycare	I do not agree with the merger it has been a long time that Union Hospital went down hill on providing health care to the citizens of terre haute and vigo county I don't ever want my family or my dog to go to union its that bad but regional is a lot better then Union Hospital but now if the Merger goes through me and my family will be going to Indianapolis for our Healthcare
Calvin Stucker	Self	As a retired senior citizen, my health plan covers only Union Hospital. In the past, I had a specialist who was affiliated with Regional Hospital and if the 2 don't merge, I will lose one of my specialists. I also know that Union Hospital offers its patients the freedom to make payments and Regional Hospital doesn't.

James Fainot	Terre haute regional Hospital	I believe that the merger of union and regional hospital is necessary, and if this merger is not approved, I feel that there needs to be a sale of regional hospital to another provider in order for the overall advancement of healthcare in the Wabash valley to move forward Hca has always only given the minimum funds to regional hospital for operations and that is not going to change. union hospital has a better reputation overall in the community and they stay up to date on technology and services offered to the community . this is there town and it is in the best interest that HCA presence in terre haute come to an end.
Robert McLaughlin	n/a	The merger of Union and Regional hospitals is a soound marriage for our city. Population only merits one hospital. Because of current duplications of service, there will be many cost savings. Also it will allow for more medical specilization along with consolidation of medical practices.
Christy Minton	Union Health	I fully support the combining of two hospitals as I truly believe that combining efforts will more improve the health of the people of the Wabash Valley.
Lorrie Harper	Union Hospital	The Union/Regional merger in Terre Haute Indiana would be a disservice to Terre Haute and the surrounding communities. Union's lack of quality care in itself should prevent it from moving forward with the merger. I have witnessed their negligence and disrespect for family members over and over again. In my opinion, this merger would just empower them to increase their pricing by eliminating their nearest competition and Terre Haute would be left with no quality of care. This merger would create a healthcare desert for this area.
Melissa Basan	Union Health	As a Physician Recruiter for Union Health, I like our vision to lead the Wabash Valley to their best health and wellness! Thank you for supporting the COPA!
Chat Chatterji	Union Hospital Terre Haute	As an Indiana taxpayer, I am opposed to Union Hospital becoming a monopoly for medical services in my community. It's anticompetitive. It clearly shows that this "non-profit" is overcharging for its services " since it apparently has all this excess cash to be buying up its competitors, thus limiting the choice we have had in the past.
Sara D Smith	Sycamore Engineering, Inc	I believe in Union Hospital acquiring Regional Hospital will be a good thing for our community. It will help to streamline services. Our community is one of the unhealthiest in the state and we need a team approach to better health outcomes. This would possible expand healthcare to more mental health services. Improving the access and quality of care is essential in solving our community health deficiencies.
Meredith Osburn	Wabash Valley Goodwill	After participating in a Terre Haute Chamber of Commerce Event, I understand why allowing our locally governing Union Hospital to acquire Regional Hospital. It will allow vital resources to be governed and managed locally, with strong local leadership at the forefront of vital community success metrics.

JOHN COLLETT	Garmong Construction	Regarding the COPA application that Union Health has submitted with the Indiana Department of Health, I believe that this will increase services across our area, as well as, keep cost down throughout the region. I highly support this effort.
Brandy Mattox	Diplomat	I have a strong medical record that proves Union hospital is not a hospital of community but one solely of revenue. This hospital does not provide solely for the community value of terre haute but operates solely on the basis of revenue and growth. Vigo county desires to have an option for their health care needs. They not only need but deserve Regional hospital. It is part of our constitutional rights to be able to choose a hospital that cares more about their community then about their revenue.
James Ellis- Granton	Individual	I am not in support of this merger. I believe that this is a monopoly and we the citizens of Vigo county deserve to have options when it comes to health care. In my personal opinion I do not believe that Union Hospital is well run. I do not think this is legal or good for our community.
PJ	Union Hospital merger	This merger is starting to look like a bad idea. I received word from my Physician, that Union has purchased their practice. It appears Union is trying to also buy all the local private practices which will effect the health care available in neighboring counties where there have been strong health systems in place utilizing the partnerships with practices like my physicians. It seems they are going for a monopoly and hurting nearby health systems, not improving the health of those in the Wabasb Valley.
Kim Myers	none	It makes sense to combine the two, they can share resources including healthcare providers and continue to offer services. Obviously Regional is wanting to sell for a reason. If the state prevents it from occurring, what happens if Regional shuts it's doors?

Robbie Van Winkle Re Union Hospital	<p>Although I live in Illinois, I hope my opinion counts. My husband and I obtain all of our medical care in Terre Haute. We love the availability of care and all the doctors and staff. I personally go to both facilities for care and appreciate the care. Recently my husband had to have emergency care ending up in Indianapolis then back to Union fir almost a month to recover. I find Union innovative in their future care plans. The doctors we have are in health care because they genuinely care about their patients. I honestly went to a Horizon Health care doctor and found tge entire demeanor and practice totally different than the many years I had been there for care. The price for care tripled. I was given erays I didn't feel I needed and according to their protocol at Hirizon I had to have. I don't understand why there are any questions regarding tge acquisition of Reginal Hospital by Union Hospital when the care us exemplary and you would be leaving them both as Indiana hospitals. Illinois charges are way different and I believe would make a huge impact on the local areas pricing and care. People wouldn't be able to seek the care like they have now. Please think twice before making this decision. I truly believe the care in Terre Haute will grow with Union. They already have brought Brain and Spine care to the area. That alone is a HUGE addition and WIN for Terre Haute. Keep growing Terre Haute with Union!</p>
VICTORIA POTOCZAK Victoria Potoczak MD	<p>Re: Terre Haute Regional Hospital merger with Union Hospital Terre Haute IN I feel the community has the need and benefits from the 2 differently owned hospitals. Regional offers everything Union has and shares the same doctors. Due to the population locations the south end of town residents prefer Regional. Union would have a monopoly on services employment and health care costs. I am against the merger. I don't see the benefits to the community and patients</p>
Kiya Lane Healthy Indiana Plan	<p>My information</p>
Gloria Sachdev Employersâ€™ Forum of Indiana	<p>I suspect you saw this new article already as it was in USA today, Indy Star, and KFF, but just in case not, here is an article by a KFF investigative reporter who went to Terre Haute to better understand COPA concerns and the potential impact of the proposed Union Hospital merger with Terre Haute Regional Hospital: https://kffhealthnews.org/news/article/indiana-copa-hospital-monopoly-scrutiny/</p>

Dave	N/A	<p>Bad idea to have a one hospital town. There should be a choice for care and union buying regional takes that choice away. Union says nothing will change but it has. I was just informed by union that any bills after 1/1/24 are no longer eligible for self pay. The administration voted to end that option for any new bills. Now they have a formula based on what you owe and they tell you what the payment must be. If you can't afford said payment they send you to collection. I offered lowered payment amount and was told no. If you make just enough too much to not qualify for aid but not enough to afford payment of large bill then your out of luck. They are going to ruin your credit and not work with you now. This will force some people to go without care knowing the hospital will no longer work with people who can only afford small payments.</p>
Rachel Woltman	Union Hospital-Regional Hospital	<p>It is felt that allowing Union Hospital to acquire Terre Haute Regional Hospital would not be of benefit to Vigo County or surrounding communities. It is felt this will create a monopoly. It is also felt that the proposed restructuring of service lines will not be of benefit as there is the potential for increased burden on local EMS, increased delays in care that could result in poor patient outcomes.</p>
Anonymous S	Private	<p>I am a resident of Vigo County. I speak from personal experience of my family's health care between the two hospitals. While all healthcare organizations have their challenges in delivery of quality care, there are few checks and balances in place at Union Health to deliver evidenced based standards of care and protect patients' safety. It appears so on paper, but in actuality, there are gaps in the care as well as the processes. This is one reason it is so difficult to attract competent, well-trained, practitioners to the area. As one person said it when the COPA was announced, "How can Union say they're going to deliver Quality of Care with this acquisition when they don't deliver quality of care now?" That is the question we have for the IDOH--how are you going to assure this community that the care delivered by Union Health is going to get to the level of quality as seen in Sullivan, Evansville, Indianapolis, etc? Health care in this area is behind in many aspects and one factor is the unchecked, unmonitored growth of Union Health in this area. The organization has grown without strategic planning on how to deliver appropriate care. Most of their services are contract services with little involvement or vesting in the community. This is true of some of the direct leadership as well--they aren't even residents of the Wabash Valley. We would hope that the IDOH would carefully and thoroughly review patient experiences, patient safety events, and drill down into the day-to-day operations before making a decision that will impact this community's future. A few years ago, Union Hospital made their lab "Provider-based" and eliminated their contract with an outside vendor. The result was a tremendous increase in costs for testing. They also have changed their billing practices and there have been reports of patients receiving the same bill multiple times, bills not being received until they are sent to collections and changes in coding and billing practices to "optimize" revenue. If this COPA is approved, there will be no guarantee that they will not increase pricing in other areas as well. There are significant concerns regarding patient safety which need to be reviewed and investigated. If Union Health becomes the only health care provider in the Wabash Valley, not only will the quality of care to the community be compromised, but choices will be taken away from patients and employees. Since this proposal was announced, the general morale of both hospitals has been affected in a negative way. The community is confused as to what the current status is and many are going elsewhere to receive care, often at increased costs due to having to go out of network of their insurance providers. Additionally, there will be a substantial loss of tax revenue for community if a for-profit hospital is eliminated. While HCA may sell Regional Hospital, it would be better for the community if it was another entity other than Union Health. This area needs competition in Health Care, not a political decision, but a decision that provides choice to patients. Please, do not do this to this community. Terre Haute is a struggling community and this would be another blow to an already fragile environment. We have never thought of moving from this area, but if Union Health becomes the only provider in town, we will be hard pressed to remain, knowing care is haphazard and reckless. We implore you not to approve this COPA application. Thank you for your consideration.</p>

Daniel Walters	Terre Haute Regional Hospital	Union Hospital buying Regional bad for area need to be two Hospitals. Union want to close a lot of departments down and move to Union. I have work at Regional go 35 years and talk to a lot of patients they told me they will go to Indy if Union owns Terre Haute need two Hospitals if Union gets us a lot of jobs lost
Brittanee	Terre Haute Regional Hospital	I do not agree with Union Hospital buying Terre Haute Regional Hospital! Union hospital just looks at there patients as a number they do not have the care and compassion as Regional! Terre Haute can not run on one hospital! When you go to Union now patients are waiting 2-4 hours just to go back and see a doctor! Letting Union buy Regional gives the people no choice on where they want to go for health services! Terre Haute will lose business because if it is not life or death they will travel to Indy or Illinois for there health care needs! Not only that the amount of money patients will have to pay for services will double if not triple because of the merger!! This merger should not happen!! Give people a choice!! I know a lot of Regional employees will leave and go somewhere else to work! The hospitals are already short staffed so that will make it even worse!! Do not let this merge happen!!
Larissa walters	Terre haute regional hospital	I don't think it is good for Union Hospital to take over Regional hospital because a lot of the people in the community don't like Union hospital and say well not go there and it's not good because a lot of departments at Regional will be closed and people will lose jobs and the Quality of area in the area will go down and a lot of patients will travel to Indy for care and patient will have a longer drive to get care because Union Hospital is on one end of town
Julie mccormack	Terre Haute Regional Hospital	I don't think Union Hosp should buy Regional Hospital. The patients don't want it to happen, said they will drive to another town for services if this merge happens. Our establishment has already gotten rid of some departments. How can we be a hospital without all the departments that are needed to be a hospital? Many Many people are going to lose their jobs if this merge happens. They are talking about after the merge, to get rid of at least 3 more departments! Catch lab is one of them, if we don't have a cath lab and someone comes in with heart problems, how are we to take care of that individual? If it were your family that came to a hospital for care and it was delayed because there is no area, then they are sent to another hospital, the outcome for that person drops dramatically. The cancer center is another area they said would get rid of. Same scenario for each area of the hospital! The care is not going to be here! The employee health area has already been depleted. So anyone who needs seen from a job site now goes elsewhere. And, for Union to merge the Regional facility with theirs will only be a MONOPOLY! It's just bad business! Thank you for caring about the people and their wants of our community, and doing what's right for them! The people have stated their opinions and I am writing to let you know them. Along with my opinion that this merge should not happen.

Maria Boyd	Terre Haute Regional hospital	Pts do not want the merge between union and regional. Multiple pts have complained and said they will take their healthcare to Indianapolis if merger happens. They don't want just one option for healthcare in Terre Haute
Misty Dillinger	Terre Haute Regional Hospital	I do not think the merger will be good for the community. I do not want this to go through.
Steven McDonald	Concerned citizen	The service area that is serviced by Union Health is sorely lacking in multiple specialties. Locum tenens physicians commonly provide inpatient care for many of these including Urology and Gastroenterology. There is no hospital coverage for Endocrinology. Outpatient GI is limited to only one physician who is approaching age 70. Outpatient endocrinology is limited to one NP. Although there are 2 Urologists, one is not accepting new patients and the other only will see new cancer patients. The system has only one Pulmonologist who also works 25% of the time as a hospital-based Intensivist. This means patients needing these specialties as an outpatient must be seen by an APP. And well-trained and "seasoned" APPs are valuable and knowledgeable for common processes, many of poorly trained or simply hired directly from school. Union has extremely limited access to psychiatrists. The only dermatologist in the community is reducing her time from full-time to 3 days/week. There is only one ENT in the area so many patients are seen by the APP. The area has no Rheumatologist as well as no Geriatrician. I understand this may be the plight for many similar communities--more rural and distanced from the more lucrative "big city." I would like to know specifically how the merger of Union and Regional will make this community more attractive to new physicians to cover these essential specialties. It seems intuitive that similar communities would be pressured to pay at a higher scale to attract these physicians. However, I also understand the hospital system must maintain some profitability to continue to offer services. I don't know how medical costs rise since physicians and hospitals have fixed incomes from Medicare and Medicaid and have contracts with other payors. With Union's involvement in Population health, I am hopeful the community will see a slow improvement in overall health. Vigo Co. is very unhealthy. But, my point--at the end of the day, I would like to know some specifics how the system will attract new physicians.
Steve	THRH	I'm not sure about this merger. I've heard a lot of people saying UNION doesn't treat their employees well. THRH makes me feel like going to work each day because they care about all of us. How will our jobs be affected? If what is submitted and they follow through with what is stated. I can see that it will be better for the Wabash Valley but we are only 5 miles apart and moving departments from one location to another will be very difficult for our patients. The whole thing will need to be rebranded

Kelly Barnhart	Terre Haute Regional Hospital	I am hoping that Union does not take over our hospital. I have worked here for 33 years and truly believe that the people of Terre Haute and Surrounding areas need a choice in their medical care. There are people that do not like Regional and go to union and there are people that absolutely dislike Union and come here. They should have a choice. I've heard many people including my family members say they will drive to Paris or Sullivan before they go to union. I also think as a medical professional I should have a voice in where I work. So please I hope you deny that application for union to buy regional. A lot of people are quitting because of this.
Eric	none	The notion that services and cost would improve after competition is removed is laughable at best. Instead, there is every reason to believe that quality of service would decrease and the assigned price would increase. Union Health is pursuing this because it makes good business sense in their mind, and there is little to no concern when it comes to the eventual community impact. Allowing this merger to proceed would be disastrous in the long-term and therefore should not be approved.
Elizabeth Anderson	None	As a disabled individual with multiple medical conditions and numerous drug sensitivities, I regularly see several general and specialty physicians in Terre Haute. Some are affiliated with Terre Haute Regional Hospital (THRH), some with Union Medical Group (UMG), and some remain independent. Due to my unique health circumstances, it's essential to have an accessible primary care practitioner who is familiar with my case and can help me navigate routine care, minor emergencies, and a bewildering array of specialists and conflicting treatment recommendations. In the interest of maintaining continuity of care, I have visited the same primary care clinic for nearly 30 years. Unfortunately, since UMG bought out this medical office several years ago I have witnessed a notable reduction in quality of care. The best MD and Nurse Practitioner I've ever had both left the practice under duress. Turnover of office and medical staff has risen while provider availability has declined. Since the clinic fell under UMG control, I experience longer wait times to schedule appointments and procedures and more errors in my medical and prescription records. For these reasons I now prefer to receive care from THRH facilities and affiliates, although this is not always possible due to UMG's current dominance in the community. It's only fair to note that some area residents prefer UMG over THRH. These are highly personal decisions that all patients must make for themselves. My point is to stress the importance of HAVING a choice, which a UMG buyout of THRH would strip from me and thousands of other patients in the Vigo County health service area. With this COPA application, Indiana's state legislature has attempted to execute an end run around federal anti-trust laws, allowing no opportunity for citizens to vote on this corporate health care takeover. No doubt they realize that all who fully comprehend the ramifications would oppose it. After reviewing the COPA application I frankly dread the negative impact that this outcome would have on health care options and costs for myself and other area residents. Monopolization never favors the consumer. I strongly urge the IDOH to decline approval of the UMG acquisition of THRH. Thank you, Elizabeth Anderson

Brenda Henderson	Vigo County citizen	Please don't monopolize our health care! (However, I know this will be done in spite of what citizens want.)
EXIA STRAHLA	THRH	I WOULD LIKE TO HAVE THE OPTION TO CHOOSE TO REGIONAL AT MY PRIME HOSPITAL AND ITS CLOSER TO MY HOME AND I DONT WANT MY TAXES TO GO UP
Jane	THRH	I feel like this merger is a bad idea. IU health should buy THRH out because itâ€™s better care. Union provides poor care to the community and there health insurance for employees is awful.
Shellina Shearer	HCA	HCA is for profit and pays taxes. If the acquisition is completed and becomes non-profit where does the \$10 million dollar revenue tax loss come into the picture? Is the city of Terre Haute and Vigo County solely relying on the casino to make up the difference? In relationship to cost, Union leadership has said that costs to consumers will not be impacted. I have a family member that needs testing completed soon and the out of pocket cost associated with this one procedure is \$1134 at Regional while \$3300 at Union. There are more examples. That's a big difference and doesn't align with what Union leadership has shared. A community this size needs two hospitals that can deliver babies and two ICUs. The Union application says those services will be at one hospital only. How will EMS and paramedics travel to only one hospital with the train situation in Vigo County? Lastly, the Federal Trade Commission prohibits a monopoly. How is one hospital system not a monopoly?
Lindsay Robbins	Vigo county citizen	I am strongly opposed to the merger. My personal experience with the care at Union Hospital of family members has been very poor. We need to continue to be able to have the choice of where to receive care without having to travel to Indianapolis.
Jane doe	Thrh	I feel like itâ€™s a bad idea. IU med center should buy Terre haute regional. More competition, better doctors, better pay. If Union wants to recruit all the doctors, then why has so many doctors left TH regional in fear of working for Union. Because they are terrible health care.
Allison Windell	HCA regional and union merger	This is a terrible idea for the community. This will ultimately create a monopoly and raise the taxes for vigo county.

Michael Steimel	Personal	<p>Union Hospital is absolutely Terrible. Their ER wait times are sometimes two hours, where Regionals wait times are only a few minutes. I've tried numerous times to set up an appointment with a pediatrician for my foster son. Union will not answer the phone. Says leave a message and we will return your call within 48 hours. My daughters and now my grandkids use a pediatrician that was associated with Regional. We were very pleased. Now that she is associated with Union, the service has become sub standard. Us Terre Haute and surrounding area residents deserve better. Please, do not let this happen. We will be forced to drive many miles to find a decent hospital group of providers. Thank You</p>
Brenda Hollowell	Regional Hospital	<p>I donâ€™t know how a merger between Union Hospital and Regional Hospital cannot be considered a monopoly. One hospital for the size of Terre Haute? You canâ€™t tell me prices wonâ€™t sky rocket? Iâ€™ve heard from several patients that they do NOT want this merger and they will go somewhere else. They do not like the care they receive at Union.</p>
Sandy Endress	Union/Regional hospital merger	<p>I worry for the Regional hospital employees. The employees have been told that they will have jobs at Union hospital same shift and areas that they work. I work on the OB department that Union is closing if they acquire Regional. I just don't understand how they will absorb all of Regionals staff. I fear that Regional employees will be without jobs. I also feel that Terre Haute and surrounding communities should have a choice which hospital to go to if Union owns both then they will not have a choice. Union will be the only choice. Please think long and hard about your decision and read all the comments and choose to do what is best for the community. I have also heard that the insurance and benefits are very different.</p>

Jocelyn Branson	Terre Haute Regional Hospital	<p>Studies have shown that in other areas with a monopoly market that the rates increased 15%. Indiana is already one of the highest ranked for hospital pricing in the U.S. What is the plan when Union Hospital goes on diversion? It seems to happen more frequently. Then where will the care go? Out of county? Terre Haute Regional Hospital paid \$508,000 in taxes in 2023. That doesn't seem like pocket change to me. So the citizens are to just hold the money is made up elsewhere? The Casino? So because we brought in one new business that means we get rid of another? Why can we not just keep things as they are and use the money gained from the Casino for other stuff instead of using part of it to replace what the city will be losing out on. Another study in a monopolized area showed that ER wait times prior to being admitted has tripled. How is that beneficial? Regional hospital receives several transfers from southern areas such as Vincennes and Sullivan. How is it beneficial to these patients and family members to drive the extra 30 minutes north? 30 MINUTES!? That can be the difference between life or death!!! Union is not situated in the middle of the county to be beneficial to all. What about the citizens of Terre Haute that walk? They walk to Regional to see family members that are hospitalized. How in the world would they make that walk up there? Vigo County already has a 20% poverty rate. Obviously not everyone has the means to purchase a vehicle or ticket to get somewhere. So these people in poverty would not benefit from the medical care being further away!</p>
Elizabeth L. Gields	Retired	<p>Requesting that the merger between Union Hospital and Terre Haute Regional Hospital not be accepted. I prefer there be a choice of hospitals in Vigo County! I have received treatment at both and actually prefer Regional. It is smaller and you are treated as a member of a family there. Union has the mentality that you are just a number, not a person. Please do not approve this!</p>
Jane Doe	Homeowner	<p>I want to read the comments people are saying</p>
Ruth Laymon	PERSONAL	<p>I am opposed to the potential merger of Union/Terre Haute Regional. This will create a monopoly as there is not a choice for healthcare without traveling out of the community. I would not be opposed to a merger the Regional with another healthcare entity outside of the immediate area. This would provide healthy competition within the community. Citizens would feel like they have choice for their healthcare needs.</p>
Marianne Bayless	Terre Haute Regional Hospital	<p>Creating a monopoly in the healthcare of Terre Haute is not a good idea for the Terre Haute community. This leaves no options for the people of Terre Haute. Getting ride of an ICU department and Cath lab at Regional will hurt patient care. Regional Nursing staff are all about to leave. No one wants to work for Union. I personally know several doctors that do not plan on working for Union. I believe this merger will only hurt healthcare in our area. Please do not let this merger happen. Our community is depending on you!</p>

Susie Hauger	Union Hospital taking over TH Regional	This would be a huge mistake to have Union Hospital controlling both hospitals in Terre Haute. This is a situation where the public should have a say. I remember back in the day when Union was the best hospital. That has definitely changed over the years and it isn't a good change. You should be able to pick which hospital you want to go to. If Union Hospital has control over both then people will choose to go elsewhere.
K hayne	THRH	From a diagnostic role, with post covid supply problems, this could be a catastrophic problem for our community in the future!! I don't see where this is a move forward in healthcare for the area. Maybe try to build up the community to entice more Drs to want to make this community home
Susan Ling	Terre Haute Regional Hospital	I am a Registered Nurse and live south of Terre Haute, IN. I feel it would be a huge disservice to our community if Terre Haute Regional Hospital merged with Union Hospital. It would cut down the healthcare services for us who are on the south side of Terre Haute. I do not work at either hospital but have used both in the past. Please do not allow the merger. Respectfully submitted.
AGAINST merger of union and regional	Public	Stop making the rich richer and the poor poorer! Union has zero patient concerns for care, your only focus is money. Don't combine regional and destroy them too!
Cynthia Elias	Terre Haute Regional Hospital	A monopoly in any business is never a good thing, especially in healthcare. The Vigo county would suffer greatly if the buyout of THRH, is allowed to go through. Many people will not go to Union and likewise there are those who will not use Regional. But there needs to be an option.
sg	COPA re Regional and Union Hospital	The union of these two hospitals is not good for, not just Terre Haute but for the surrounding counties also! This area is in need of more than one ER, and by that, more than one ICU unit. when patients decompensate , and they do on a regular basis and not just between the times of 8am and 5pm, where will they go and who will provide the critical care that they need when ICU is across town and there's no transportation available to get them there? what will happen if someone within the hospital (already admitted and in the medical floor) needs to go to the cath lab, because it's emergent and it's TIME IS MUSCLE but there's only one cath lab available across town and there's no transport for hours to get them there? To the state and the administrators of both hospitals; but to the staff taking care of these patients and to the patients who need care, this IS ABOUT LIFE AND DEATH! Please vote no to this and give people from various counties and communities a choice of where they want to go. we frequently get patients from Vincennes, Bedford, Greencastle, paris IL, Oblong IL, Casey IL, Linton and Jasonville IN who come to Regional, where will they all go? Hospitals have been holding patients in the ER until beds are available for them, now there will be less available beds and inadequate care in an emergent situation if this goes through. Please hear the public out!!

Tanya Barger	Terre Haute Regional Hospital	I am an employee at Regional Hospital and a member of the Vigo county community. Allowing this COPA to take place in Terre Haute I believe would be detrimental to this area. My husband and I researched other communities where COPAs were allowed and the results weren't favorable. Initially things went well but after a couple of years, quality of care declined, medical costs increased while employee wages decreased. Having a monopoly in an area is never good while competition is. Another area of concern is the management of Union Hospital. Even with government subsidizing they are always in the red financially. They aren't joint commissioned certified so quality of care is already not a priority to them. Please say no to this COPA!
Mary Payne	Terre Haute Regional hospital	The merge of Regional and Union hospitals would be terrible for this city.
Mary Payne	Terre Haute Regional hospital	Regional hospital pays a lot of property taxes to the city that would be lost if we merge. Union already owns a lot of properties that they have recent bought and continue to pay no taxes in these properties, our city would definitely miss the property tax that regional hospital pays to the community. Union is already monopolies most of the physicians in Terre haute by "owning" them. Their doctors already are not allowed to refer to Regional hospital or use anything the hospital has to offer, like the wonderful Cancer treatment centers mainly the radiation oncology department. Dr Tom Schmitz is a hidden gem in Terre Haute and it is a shame more people are not referred to him for his excellent care he provides without driving all the way across town. We have been told this treatment center will be closed when/if this merge happens.
Mary Payne	TH Regional hospital	Tanya Barger Yw! The COPA is disheartening, WE know that THRH has better Safety ratings and better satisfaction scores than Union. Google search Union (2.6 rating) vs. THRH (4.2 rating). Unless the public puts out their comments, the State only sees what "THRH doesn't have" through Union's eyes. If the acquisition goes through, more services lines will be closed, just like what happened to Occ. Med. Union states that they may discontinue trauma services, NICU, Cath Lab, and Oncology service lines at THRH. How can Union provide "better quality of care" when we won't have a Cath lab to save lives of heart attack patients.
Mary Payne	TH Regional hospital	Tish Kluesner Millick I agree wholeheartedly to what you're saying and yes the stats say it all! Quality of care will decline, medical costs will increase while employee wages decrease. COPAs are not good for communities. Research shows it. This community needs competition, more than one hospital option and we definitely do not need a monopoly!
W.T	terre haute regional hospital	do not think this is a good idea. having one hospital with women services, not every woman wants to go to union. people want to have a choice not only one hospital to go to when needing care.

Sandy Endress	Regional/Union	I personally don't think a merger between these two hospitals would NOT be good for the community. Union is wanting to close a good part of Regional hospital. How can you run a hospital without a ICU and full hospital services? The community needs a choice of facilities to go to. I have personally heard many people say that if Union takes over Regional they will go to Indianapolis or Sullivan for services. And how can Union absorb all of the OB department staff? So will OB staff be without a job in a year? The insurance costs more and benefits are not as good as Regional's. Please take the community, staff, and all those that will be affected in your minds and hearts while you make this decision.
Larry Strahla	Terre Haute	would like my choice of hospitals and for my taxes to go up
Sandra Strahla	Terre Haute	To have a choice of hospitals and sometimes doctors. Union does not pay taxes-- Regional does. Loss of tax revenue therefore my taxes goes up.
Storme Jennings	Terre Haute Regional Hospital	Letting this acquisition go through will be detrimental to the community. It deprives the community of the right to choose their healthcare system. Their plan denies the lower half of the community access to critical services like a cardiac cath lab. I have yet to hear one single positive reaction to the acquisition and it is clear that the community does not want this, nor do many of the employees of Regional.
Mick Fuson Self		I'm back on here because your comment "format" this small linear box that can't be expanded tends me to believe that YOU PEOPLE don't want any comments ??? This is very hard way to gather communication?? Anyway, concerning the Union/Regional merger , I'd like to add that it's my understanding that Regional pays millions each year in taxes to the State and County while Union is a not for profit which will pay 0 tax to the county further hurting the community which is already strapped for tax dollars because of lack of jobs and industry ?? This area needs these 2 hospitals for the choice of where to go as well as valuable tax paying jobs for the workers. A much better solution would be for IU to open Regional as a "WEST" facility OR partner with Fransiscan Health to open a West campus !!! Regional already works hand in hand with Fransiscan bone marrow clinic and my team of Drs have partnered with them now for 20 + years . I presently am a 21 year cancer survivor because of the care I've received from Dr Tom Schmitz and Dr Chackrabardi at Regional. I WILL NOT drive thru the 27 stop lights it will take me to get to Union. I will go South, (Sullivan , Vincennes, Robinson). When I go out to eat I want choices, not being stuck with the same thing ,

Mickey L Fuson Self
Again I am back because while trying to send you an in depth comment, my session timed out and was lost. I'll try to keep my comments brief but would like you all to know that Regional Hospital and the Drs and nurses are here are the only reason I am able to send this. 21 years ago Dr Tom Schmitz and Dr Dave diagnosed and treated my prostate cancer into remission, then 15 years ago they, along with Dr Johanson at Mooresville, treated me by removing about 10 inches of Colon for this cancer. Again successful. Then 8 years ago I was diagnosed with bone Cancer and after a successful bone marrow transplant was in remission again. Then 2 years ago the bone cancer returned and my team of Drs Along the wonderful infusion center and marrow clinic at Greenwood put it in remission again!! So you see I am NOT in favor of a take over by Union which would create a monopoly in our town.

Sally Clinkenbeard Union Hospital Merger Public Comment
I fervently please as a citizen of Terre Haute that the above-referenced merger be denied. The current wait for a routine colonoscopy in Terre Haute Indiana is 10 months. Their merger paperwork has indicated they will not close services, but they have already started to close many services and consolidate already understaffed and areas of assistance. The wait times for needed health services will only increase and citizens have no other resources, but to travel to Plainfield, IN or Indianapolis for required care. Union Hospital has eliminated and outsourced all front facing and administrative services. This has met with failure at every turn. Patients have no phone number to call a patient advocate. Patient Advocates do not return emails. As I type this billing for ALL invoices is currently on hold and patients are receiving past due notices for ALL bills already paid. Ensemble Health Partners cannot answer all the calls, and there is NO portal to reach them. Customers are being accused of fraud verbally when it appears a bill isn't paid. There is NO email system, despite the email addresses being provided to prove payment has been made. I recommend Regional Health selling to another entity to ensure Union Health has a competitor to ensure better customer service. IU Health would be a defining presence in this community. Again, I speak from an educated perspective and as a well informed citizen. You simply cannot allow this to happen -- please!

Heather Bonney None
A huge issue is billing at Union. You are a patient and you don't get a bill for almost a year and then have to pay it in a couple of days. The due date is in less than a week and if you don't pay it by then you get sent to collections. Sometimes the insurance hasn't been billed correctly.

Hannah Schultz	Union Hospital	Union hospital taking over HCA Terre Haute Regional Hospital is a terrible move for the community. There will be no competition anymore. Union hospital was cutting employees wages and barely able to keep their own doors open roughly 6-7 years ago. Multiple people from union went to regional for employment. It's unstable. The merger will ruin all the jobs currently at regional hospital since they are only guaranteed 1 year of employment.
Kyle	NA	I do not believe the Regional/Union merge would be the best interest for our community. I have personal experiences at both hospitals and they reflect night and day. At Regional I had a great experience. I could tell it was a smaller hospital with not as many resources, but the staff all treated me like family. I felt like the Regional staff went above and beyond for any request I had. At Union, I just felt like "another patient" they just show up do their job and go home. Union is getting to be too big, like a monopoly in town. They are very micromanaged and it shows. Unions billing department is atrocious, they can't keep up with what they already have and just threaten collections on everyone. I interacted with Regionals billing department and they were very polite acknowledged their mistake, wrote me a letter of apology and corrected it. If this merge goes through, patients will not have a healthcare choice anymore. It is not fair to the community. I think it would be Regionals best interest to have another competitor purchase them if they are to that point.
Anonymous	Individual comment	The COPA states that "Currently, there is no opportunity for the Union Healthcare Providers and the Regional Healthcare Providers to coordinate service lines, or to otherwise thoughtfully utilize health care resources to address the health care needs of Vigo County" this is because Union Hospital refuses to allow Doctors who are accredited to work at THRH to also work at Union. The hospital of choice in the Wabash Valley is Terre Haute Regional Hospital and the merger will force citizens of the area to seek the professional care they seek outside of Terre Haute. Furthermore, the tax implications and loss of revenue will severely impact the region Terre Haute and the surrounding community. Not only will does the community lose the THRH tax but those who choose to leave the community because they do not want to work for Union Hospital will also leave. This merger should be declined because not only will the community no longer have a choice in who they seek hospital wise in the area but also because of the loss of taxes from both a business standpoint but also from a family perspective because people will leave the area to seek employment elsewhere.
Karen Billberry	Union/Regional merge	The quality of care has diminished dramatically over the last few years. I had a friend with clear signs of a stroke on July 29th and we were placed in the waiting room. Stroke protocol was not followed and she should have had a CT scan within 10 minutes of arrival.
Lauren Ocean	Rac inc	Leave regional alone

Name	Regional/Union	<p>I have been employed at both hospitals and I think the merge would be devastating for our community. This merge has put a major stress on Regional hospitals staff as many have already left. Being the only HCA hospital in Indiana, Regional was never given the appropriate resources to be successful. Regional is currently ran by people out of state dictating how things are done. There are a lot of service lines that have closed or are only open occasionally due to this. The staff that are left are very dedicated to the patient centered care they provide and the inviting environment they work in. I believe this merge would push a lot of the nurses out of the career completely as they do not want to work for Union Health. This would affect the national shortage of nurses especially in our area. The OB department at Regional would be shut down within 6 months per the COPA. The OB staff at Regional have a wide variety of skills and are able to care for labor, post partum, hysterectomy patients, and NICU babies. If forced to work at Union they would have to pick one area and lose their expertise in other areas. Due to this, many have chosen they will find something else to do. Regionals ICU is set to be combined at Union. I know nurses that drive from Sullivan, Linton, and Dugger to work at Regionals ICU. If this merge goes through they will quit, due to the drive being too far for them. I firmly believe that if another hospital system bought Regional, things could be turned around. They could bring providers into the area and having specialties will bring the patients. What will the community do without the \$500,000 plus in taxes that Regional pays? Will our taxes all be raised to cover this loss? Our community will suffer as Union does not pay taxes. Union has become the main provider for the walbash valley only because they have the physicians and specialties that HCA would not offer to support Regional with. There is a huge difference in nursing staff at Union compared to Regional. It is obvious that Unions nurses are not invested and do not go above and beyond for patients. Union staff are stuck in their ways and unwilling to make changes. I was apart of a staff meeting g recently where the leader said "they are certain the merge will be going through. As for our unit I don't see any changes. Their physician is retiring. We have the most volume of patients for this area therefore, they will adapt to our ways." This is not what is best for the community. Union just now implemented a sepsis screening tool within the last year. At Regional, it is a nurse driven protocol for staff to call a sepsis alert if a patient meets criteria and they start treatment immediately, reflecting better outcomes. However, it appears Union will be unwilling to look at both hospitals processes for things to make the right decision as things will just go their way. Personally, I would drive to Indianapolis if I was in need of care and there was only Union Health as an option here. Our community and families deserve better. We deserve choices and options for healthcare.</p>
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Anonymous	Private	<p>The merger will not only limit the services provided in the community, the quality of the care will diminish. The long term goal is to move most services to the Union facility. This will certainly impact the care of the community on the south side. The ED at union is often full and there is a long wait to be seen. The loss of a second hospital takes away choice and allows Union to charge and develop there agenda with no competition. I have no doubt that HCA will sell Regional Hospital. It would be better to sell to a different organization. And keep 2 facility in the community. Please consider denying this acquisition. Thank you.</p>
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Dee Adams None, this is a personal comment Having worked in Healthcare in Vigo Count for 30 years, I am totally opposed to this merger. There is in no way that this is for the betterment of healthcare in this area. I would feel the same if it was Regional trying to take over Union, This is nothing but a financial move and a control move on the part of Union Hospital. Just in the past few years, if my elderly parents had to go from their home in Cory, Indiana to Union ER due to heart issues, they would have died, trying to get to Union, There is no quick way from the southern end to get across town. In fact just last week a local cardioglist was pursued by police for speeding to Union trying to save a patient from a heart attack. Also I have in my possession letter from the CEO at Regional stating that the merger will happen on Nov. 1, 2024. I find this very strange that you are taking public comments, if in the fact the decision has already been made. I also have a letter in my possession telling physicians at Regional that they need to apply for privileges at Union if they have not already done so. So in my opinion for the Indiana State Board of Health to ask for public comments in making their decision is either false or Union Hospital does not care what your findings are. They are also already in Regional Hospital changing over the computer systems, etc. So this whole thing is a joke. I also have stayed on this since the beginning and I truly feel that Sen Jon Ford was bought and paid for by Union Hospital to push this Certificate of Public Advantage thru the Indiana Leg. I would certainly hope that the State Board of Health would look at this very very closely. I also am aware that HCA wants to sell the hospital, but it looks like they could find someone else to purchase it. I truly feel this is not good in anyway for Vigo County or the surrounding communities. I also know that the Mayor is for this merger, however his own father is on Union payroll and made well over a million dollars from them 3 years ago. This is public knowledge thru Union's tax filings.

Victor Union Health This merger needs to be blocked. Over and over around this country it has been shown that health care consolidation leads to higher prices and worse outcomes for patients. This is especially important in an area like Terre Haute where many can't find jobs, or their jobs are low paying. See this study for information on the costs of healthcare mergers: <https://harris.uchicago.edu/news-events/news/consolidation-hospital-sector-leading-higher-health-care-costs-study-finds#:~:text=A%20new%20study%20co%2Dauthored,higher%20prices%20for%20hospital%20care.>

Debra Butler	Debra K. Butler	Terre Haute Regional Hospital has a reputation for being a substandard hospital and my experience with the treatment received there by a family member and friend who were separately at Regional and died confirms that reputation with me. Also the head Nurse in the ER reminded me of the nurse in the movie "one flew over the cuckoo's nest" i.e. very insensitive and seemingly uncaring. I have instructions with my husband to never let me go to Regional hospital. On the other hand, Union Hospital has persistent billing problems, invoices with insufficient detail, and problems with their phone service. Also the local nurses I know who worked at Union Hospital have gone on the road to escape the employment issues at Union hospital. However, their patient care there is much better than Regional.
SANDY ENDRESS	Union/Regional	Why is Union going to close so many units at Regional? Guarantee jobs for the Regional employees for only one year. Health insurance payment based on your hourly wage. One hospital is for profit and one is not. Please think long and hard on your decision.
William Endress	union/regional	I am texting in regards to the Union and Terre Haute Regional Hospital. I just can't see how this merger could be good for the community. We hear that they will consolidate departments. The way it is now that you must wait for many illnesses. Union is in the north and Regional in the south. This helps because there are train tracks between them. This works well presently because the ambulances can divert to another hospital. Some patients prefer one hospital or another and will not go to the other. If a merger happens most of those patients will go to Indianapolis. We already have higher medical premiums, deductibles and non covered items. Before the insurance covered everything. not now. Not by a long shot. It's a good bet that the hospital management and government officials insurance is a lot better than ours. We hear that it will be worse for us. My vote is no for the merger.
Brigitte S Gardner	N/A	I am not in favour of the merger. Regional Hospital is clearly the better hospital on its own. I especially dislike Union Hospital's billing practices. services and care are better at Regional. Union Hospital as a monopoly in Vigo Co. is not good business.
Steve Williams	union Hospital	We are opposed to the merging of Union and Regional Hospitals in Terre Haute. If they merge, it will be a monopoly. Union has outsourced several of their departments. Union will raise prices and cut back on the staff. After Union built the new hospital, several wings were empty , as they didn't have enough staff to

Stephanie Residents and
M Welsh, Voters of
Garrett A Vigo County,
Pendergast IN, as
, Rodney indicated -
Bradfield, additional e-
Jacquelyn mail
Bradfield addresses:
oldfud@aol.c
om,
bcactus6@g
mail.com,
jacquelyn.bra
dfield@gmail.
com

To: Indiana Department of Health From: Residents and Voters of Vigo County, IN, as indicated (including three additional e-mail addresses) Re: Proposed Merger between Terre Haute Regional Hospital and Union Hospital via the Certificate of Public Advantage Date: September 3, 2024 Please consider this correspondence to be the reasons we do not support the proposed merger between Terre Haute Regional Hospital (THRH) and Union Hospital (UH) of Terre Haute. They are in no particular order. 1. The statement by UH management that the merger will be beneficial to competitiveness “mergers which have resulted in becoming a “one-horse” town have lost whatever competition existed before. Prices rise. Services decline. 2. The property taxes paid by THRH, part of a for-profit corporation, will not be borne by UH, a not-for-profit corporation - presumably, the tax burden will fall on the remaining taxpayers of Vigo County, the population of which has declined approximately 7% since 1970. Fewer people, higher taxes. 3. Distances driven by non-residents of Vigo County from the southern counties of the state - UH is approximately seven miles from THRH. If a patient is in an acute medical situation, seven miles may be the difference between life and death. 4. The departures of professionals from each hospital pending the outcome “there have already been significant changes in medical personnel in the two hospitals since the proposed merger/acquisition was announced. Some have stayed in the area while others are working in Indianapolis or surrounding communities. From personal experience and the experiences of others, care has changed in the negative. 5. The decline in service which may be tied to a lack of competitiveness “UH which owns/controls, or otherwise influences the largest medical practice in the area (the former UAP Clinic) has encouraged or directed patients to go to its urgent care department which may then send patients to the ER where a wait time of five hours is common before any decision about hospital admittance is made (if, indeed, there is an open bed). This occurs after being told that the patient’s physician, a part of UAP/UH, cannot see the patient because the schedule is full. It appears that a decline in services and in personnel may have already begun. 6. The Certificate of Public Advantage (COPA) developed and passed by the Indiana legislature to be administered by the Indiana Department of Health (IDOH) “one must wonder if this legislation was passed only to avoid review by the Federal Trade Commission (FTC). A recent article in The Wall Street Journal observed that of the one thousand hospital mergers in the United States (of more than six thousand hospitals) in the last two decades only thirteen (approximately 1.3%) were denied by the FTC. Is there cause for concern about becoming the fourteenth? The COPA itself “states “the department can issue a certificate only if it finds that there is clear evidence that the proposed merger would improve the health outcomes, healthcare access, and the quality of healthcare provided to the population currently served by the hospitals, and those benefits must outweigh any potential disadvantages that result from the proposed merger.”As residents and voters of Vigo County, and for the reasons stated above, we do not believe the proposed merger meets the COPA criteria and urge the IDOH to deny the merger.

Jane
Cannon

Personal

I have been employed at both Union Health and THRH. I would like to share my personal and professional experience with both organizations. HCA is a process and policy driven organization. They invest in their staff to ensure they have the skill sets, talents, education, and resources for success. Their policies and procedures are founded in evidenced based standards of care and staff are held accountable by their leadership. Their leadership round on patient units regularly, talking with patients and staff to identify opportunities for improvement. They have a structured, success proven approach. Unfortunately, HCA has opted to leave the community, but they have done a tremendous amount of good during their tenure. My husband was hospitalized at THRH many times and I can say that the compassion and care was always greater than expectations. Union Health, has many good, compassionate, committed staff. However, in reading the COPA and responses submitted, as is common, Union has overestimated their capabilities, experience and especially their processes. They do not have a program to address Health Care Disparities, they have checkboxes to meet the requirements for CMS. There are lovely people that work there, but have little to no experience in healthcare making healthcare decisions and their leadership is invisible. When rounding, they present data that may or may not be accurate. Policies are anemic and ambiguous by design; protocols can vary from unit to unit and there is little to no accountability. I have a hard time understanding how an acquisition of THRH is going to improve the quality of care for patients in the Wabash Valley as it's not going to create more providers or even different providers. If neither UH nor THRH have been able to recruit providers to the area, what is going to change with an acquisition? For the past year, this community has been held in limbo from the time the announcement was made. Many in the community think that it's already been approved, many staff left THRH because they couldn't continue to be held in limbo and/or did not want to work for UH. One thing that I found particularly arrogant on the part of UH in the COPA was their response to how staff could "go to the casino to work" or to a local nursing home or one of the Critical Access Hospitals (Horizon Health, Sullivan County Community Hospital, etc.). Is it really in the best interest of the community for an organization (UH) to dictate where people can work? We have lost many talented health care practitioners since the announcement in 2023 and the quality of care has not improved by the continued rapid expansion of UH. More buildings equals quantity, not quality. UH has contracts with many vendors and provider services. This equates to lack of continuity, increased risk of error, lack of understanding of processes/protocols and risks to patient safety. The EMR system is cumbersome and does not communicate well with other systems, and bandwidth is limited to make improvements. As a patient, my experience has been the care provided at UH is subpar, disjointed, and dangerous at times. I cannot recommend UH to anyone. If the acquisition is approved, my only hope is IU, Ascension, or Deaconess moves into the community. Please look past the politics of this acquisition request and consider the future of Terre Haute. As far as UH promising not to raise prices, there will be no way to keep them in check if this is approved. They will find a way to raise prices. Guaranteed. As they frequently say, "We're Union, we can do whatever we want". There needs to be two health care organizations in Terre Haute or patients will be left with no choice. Thank you.

Prefer to remain Anonymous	None - Personal opinions only	<p>First of all, I would like to say that I don't believe that any feedback received during this 30 day period of public opinion will make any difference or have any impact on the decision to allow the acquisition to occur. I believe that the decision has already been made. Let's be clear, this is an acquisition and not a merger as Union Health will acquire Terre Haute Regional Hospital. Terre Haute Regional Hospital including the current service lines will be greatly altered. The approval process started years ago with Senator Ford and his associates who passed legislation to allow the acquisition to occur. This legislation indicates a level of political motivation for this acquisition to occur. Since that time there has been preparation behind the scenes to prepare the forward motion of this event. Plans at the hospital facilities are already in motion for a tentative closing date of 10/31/24. Union Health has been talking with Terre Haute Regional Hospital employees regarding employment processes since last fall after the initial announcement was made. Union Health is installing cabling at Terre Haute Regional Hospital (THRH). Why would Union Health make this type of expenditure/investment if there was not an assurance that the acquisition will be approved? I completely disagree with this acquisition by Union Health. This process will result in one hospital facility in this area resulting in a monopoly of hospital care and services for patients in this greater area. There will be no competition and competition is good for the service industry. Competition results in better quality and better patient care when multiple facilities have the same service area. This acquisition has the potential to lead to higher prices for patients, reduced access to healthcare, and lower wages for hospital employees as well as reduced innovative care. I don't believe that it is in the best interest of the public to allow this proposed transaction to occur. I clearly understand that HCA will divest or sell Terre Haute Regional Hospital. I believe that this decision has already been made by HCA. The question is who will be the buyer? I believe that the buyer should be some other health care organization/entity such as IU Health or Ascension Health. With 2 healthcare hospital providers in this service area, the hospitals would continue to strive to improve quality as well as services to this community as we have seen with HCA THRH and Union Health. Did you know?.. HCA released the following information regarding HCA and THRH in the state of Indiana for 2024: There have been 112,329 patient encounters. The total number of admissions is 4869. There have been 20,964 ER visits with 47.2% with Medicaid. There has been a capital investment of \$2.1 million. Salaries/wages/benefits exceeded \$51.3 million. \$5050 has been donated to charity as part of community contributions. There has been \$16.7 million in local/state/federal taxes paid. Union Health is a "not for profit" entity. There will be a loss in property taxes to the community/state currently paid by HCA for the THRH facility. While Union Health has stated that the THRH employees will have a position for the next year, what happens to those employees after that 1 year period of time? With a consolidation of services, it would not be surprising if there was a loss of jobs for people in this greater area. What happens with the patient volumes? Is Union Health capable of providing care to greater numbers without any loss of quality with the patient care delivery? Will ER wait times increase? Will there be hospital beds available for this increase in patients from any loss of beds at THRH? Will patients now have to travel across town to obtain the necessary care that they currently can receive in the southern part of the city/county? There is another thing that I think that you need to consider. This acquisition was initially announced in September 2023 but it has taken over 10 months to submit all the required information/paperwork needed by you to approve the COPA "which was announced in August. Does this sound like an organized and well prepared proposal to result in a sole provider of healthcare services to this community? Again, this acquisition has been years in the making. One would think that all information would be compiled and ready for submission but that obviously is not the case. Thank you if you read and consider this submission.</p>
Brandi Andreae	Indiana State University	Against this hospital merger for the safety and care for patients and for educational access for students to receive a variety of experience from multiple healthcare settings.
Meghan	First Steps	I do not feel that a merger of Union and Regional Hospital would be beneficial to the people of Vigo County. Further limiting options to healthcare options, costs, and physicians would only serve to take more control out of the hands of the consumer in the greater Vigo County region. This could potentially drive people to seek healthcare in other areas if they do not feel there is enough diversity within Vigo County to meet their healthcare needs.
Brenda Garibaldi	Terre Haute Regional Hospital	Against merger due to a terrible plan, this town can not sustain one ER, one hospital with ICU, too dangerous. This town needs 2 full functioning hospitals

Megan Ziemendorf	Terre Haute Regional Hospital	Terre Haute cannot function properly with just one hospital. Both hospitals are needed to maintain proper healthcare services. The merger should not happen.
Amber	Can't tell you because I would lose my job	<p>I am writing you with concern over a possible merger of two hospitals in Vigo County, Union Hospital and Terre Haute Regional Hospital. These are the only hospitals in Vigo County. One of my many concerns (along with many other community members) is if this purchase were to be made that it would create a monopoly of hospital services in this county and our options for good and affordable healthcare would diminish. Vigo County is a healthcare hub for many other smaller surrounding counties (including but not limited to Sullivan, Vermillion, Greene, and Parke counties), and of course let's not forget our neighbors in Illinois and their counties of Edgar, Clark, and Crawford counties just to name a few. Vigo County serves all these counties, I would know I am a nurse in Vigo County and I like to get to know my patients. Union Hospital already purchased another smaller hospital in Vermillion County Indiana (a border county to Vigo County) in 2006 after gaining control of that hospital in 1996. Vermillion County has no other hospital. As a former resident of Vermillion County I know that this proposed merger further limits the access of good quality and affordable healthcare to the residents of Vermillion County. Another concern that arises for me is that if this merger should happen will any governing body step in and make sure the cost of healthcare does not rise? I spoke with (now former) Senator Jon Ford via text message (while he was still Senator, and I have the texts to prove it) and he stated that Union Hospital may not be subject to the rules of a COPA. How is this possible? If Union Hospital is not controlled by the rules of a COPA then they will have free reign to do whatever they please with healthcare costs and services. I also have concern that the State of Indiana is in such favor of this proposed merger that they have skewed and created new laws for just this proposed merger. How did the Indiana General Assembly come up with the requirements for application of a COPA? The requirements it would seem were tailored made to fit Union Hospital and this proposed merger by Mr. Jon Ford, Bob Heaton, and many more. This has scandal written all over it. Also, the state may have created such laws that don't require the hospital purchase to be reported to the FTC? How is this okay? Does the State know better than the Federal Government? Is the State trying to bypass the Federal Government for personal gain (i.e. Kickbacks made to House Representatives and Senators by Union Hospital)? Former Senator Jon Ford was approached by Union Hospital to help them with getting this merger off the ground. Mr. Ford introduced Mr. Holman to the Indiana General Assembly in February 2021. Mr. Ford was also co-author of State Bills (Please see Indiana State Bill 416 and State Bill 298 regarding hospital mergers). Is it standard practice for a Senator to introduce a company (Mr. Holman) to the Indiana General Assembly knowing that you are the one helping said company and making the laws that promote opportunity for said company? Or is it standard practice for a company to be put on the Indiana General Assembly docket with an unbiased audience to begin with? How could there not be a bias in favor of Union Hospital when your (the Indiana General Assembly) colleague is standing in front of you and is enthusiastically introducing a person/company to you? Again, such practice ignites tremendous suspicion. Union Hospital announced the purchase agreement on September 13, 2023 and two days later on September 15, 2023 Mr. Ford announces his resignation from the Indiana State Senate ahead of his term limit. Sound suspicious? It most certainly does, I did make the Indiana Attorney Generals office aware of such suspicion. I am also concerned for the citizens of Vigo County and surrounding areas to have access to good quality healthcare. Mr. Steve Holman, CEO of Union Hospital, stood in front of the Indiana General Assembly in February of 2021 and talked about Vigo County's terrible healthcare metrics. Stating that Vigo County is 84th in quality of life, 85th in health factors, 87th in health behaviors (i.e. smoking), 79th in socioeconomic factors (i.e. unemployment, educational attainment). Sidenote: there are only 92 counties in Indiana. Mr. Holman recited these numbers in front of the general assembly in hopes to get them to make laws that enable Union Hospital to purchase Terre Haute Regional Hospital by showing a county in desperation. But, what Mr. Holman failed to mention to the General</p>

Assembly (who asked very little questions of Mr. Holman) is that Union Hospital and its subsidiaries provide substantially more healthcare services to more citizens of Vigo County and surrounding areas than Terre Haute Regional Hospital. So, if they are providing the most services to these citizens, then aren't they a big part of Vigo County's healthcare metrics being so low in its ratings? Shouldn't a study have been done to see what kind of volume per capita Union Hospital is doing vs. Terre Haute Regional Hospital? It doesn't take a degree in mathematics to figure out which healthcare system in Vigo County is making our metrics so low. And now that healthcare system, Union Hospital, wants to buy another competing hospital? Where will Vigo County's healthcare metrics fall then? 92nd out of 92 counties? Union Hospital has to solve their own problems before passing those problems on to another healthcare system. Also, what about Sentinel Events? According to Wikipedia the definition of a Sentinel Event is "any unanticipated event in a healthcare setting that results in death or serious physical or psychological injury to a patient, not related to the natural course of the patient's illness." How many has Union Hospital reported in the last year? How many of those have resulted in untimely deaths? I know for a fact it has happened. Is this the kind of care we want to spread to all of Vigo County? My fear for the citizens is that a hospital merger may only make things worse in terms of quality healthcare. And what about the jobs in Vigo County? Union Hospital is the largest employer in Vigo County. This leaves physicians, advanced practice practitioners (ex. Nurse Practitioners, Physician Assistants), nurses, therapists, etc. with no bargaining tools for their wages, sick leave, health insurance, paid time off, etc. At least with two healthcare systems in Vigo County if wages and benefits at one facility seemed unreasonable a person could go to the other facility to work. But with a merger this severely limits this capability. This could possibly foreshadow a mass exodus of the working middle class of Vigo County (and surrounding counties) to seek out other opportunities in other counties and/or states and possibly move out of Indiana. And when people go, so do their tax dollars. Which brings me to my next point, taxes. I was told by a Vigo County Council member that Union Hospital Inc. pays no taxes. Which sparks a question "How is this good for our community? With a proposed merger Union Hospital will buy more buildings and land in Vigo County and still pay no taxes? Seems only logical that Union Hospital is leaving tax payers of Vigo County to make up the difference of funding new schools, a new jail, a new pool, a new convention center, etc. all while giving the citizens cut-rate quality healthcare. Who may I ask will finally stand up for the citizens of Vigo County? I hope and pray it will be you.

Thomas M. Paul
Schmitz, Siebenmorge
M.D. n Cancer
Center at
Terre Haute
Regional
Hospital,
Radiation
Oncology
Department

I am a Mayo Clinic trained, Board certified radiation oncologist and am the medical director of the radiation oncology department at Terre Haute Regional Hospital where I have worked for the past twenty-five years. I am not employed by Terre Haute Regional Hospital or HCA Corporation. I formed my own medical professional corporation, Radiation Oncology Care, PC, in 1999, and I am its sole employee. I independently provide the radiation oncology physician services in our department. The rest of our wonderful radiation oncology staff members are employed by HCA/Terre Haute Regional Hospital, and by far most of them have been with me for the entire twenty-five years that I have been here. It is an exemplary team. In 2023 we received a national Press Ganey Human Experience Guardian of Excellence Award for the seventh consecutive year, indicating a 95th percentile and above level of patient satisfaction of our radiation oncology services. If the merger of Union Hospital and Terre Haute Regional Hospital is approved, Union Hospital administration has made it clear that they will shut down the radiation oncology department at Terre Haute Regional Hospital and consolidate all radiation oncology services at Hux Cancer Center. Thus, I am vehemently opposed to this merger. My department treats many patients from throughout the Wabash Valley and especially from the southern counties of Sullivan, Greene, Knox, Davies and southern portion of Clay County. We also serve many patients from Illinois as I-70 takes them close to our doorstep. When many patients already have to travel 30-40 minutes to our facility while dealing with cancer symptoms and side effects of radiation therapy and chemotherapy such as significant fatigue, nausea and pain, it would be unnecessarily burdensome for them to travel an additional 20+ minutes north through the traffic and intersection lights of Terre Haute to go to Hux and then back. Until the proposed merger agreement was announced on September 13, 2023, HCA /Terre Haute Regional Hospital and I were in many meetings with Hafer architects in Evansville and with the Varian Radiation Therapy Equipment Company and Garmong Construction with approved funding to break ground last October to build an addition to our department consisting of a new radiation treatment room to accommodate a new state-of-the-art radiation treatment machine (a Varian True Beam Linear Accelerator). All of that project ground to a halt on September 13, 2023 because of Union Hospital's plan to shut down our department. How is that even remotely expanding healthcare services to the people of our Wabash Valley Region? I and my staff had planned to continue to provide our services here for many years. If Union implodes our department, I guarantee that the vast majority of our staff will scatter to the winds with no intention to join Union. I will take my knowledge and experience to other facilities outside of the Wabash Valley as I do not intend to work with or reward any entity that so disregards the value of what my staff and I do for our wonderful patients.

Wes Isbell Customer

This will lead to poor healthcare with poor service. The medical industry needs competition to be competitive and strive to be better. I have had good experiences with Union and terrible experiences. Another major healthcare system needs to buy Regional, not Union. I will take my medical needs to Paris, Illinois hospital before I drive to Indianapolis, so that money will be leaving state, as will many others.

Stephanie Federal Trade
Wilkinson Commission

Federal Trade Commission staff submitted a public comment opposing the Union Health/Terre Haute Regional Hospital COPA application. The comment is available here: <https://www.ftc.gov/news-events/news/press-releases/2024/09/ftc-staff-opposes-proposed-indiana-hospital-merger>.

Anonymou Na
s

It would be wrong for UH to buy THRH. They would make too many changes that would affect care. Shut the ED, shut down ICU. It would be negative affect on everyone seeking care. The southern of town needs help care close. Not have to fight traffic and trains. PLEASE DON'T VOTE YES!!!!

Anonymou s	None	As a lifelong resident of Terre Haute I feel this acquisition would NOT benefit our community. Having only one healthcare system in a town this size will only put patients at risk. The changes that are being proposed will cause delay in treatment for those patient's living in southern Vigo County requiring emergent care for life threatening illnesses. Patient care and access is not the only consideration, our city/county will lose a significant amount of tax money further putting our citizens at risk. Healthcare costs and employee wages will also suffer in an already suffering economy. This entire process has already cost both institutions a significant amount of time, energy and resources that could have been used to care for our patients. The decision is easy, the acquisition should not be approved.
Katie	Terre Haute	Quality of care will decline, medical costs will increase while employee wages decrease. COPAs are not good for communities. Research shows it. This community needs competition, more than one hospital option and we definitely do not need a monopoly!
Jana	Terre Haute	I am not in favor of the merger due to monopoly in healthcare.
Kelsey	Terre Haute	A merger of Union and Regional would be a disservice to the Wabash Valley. It would result in decreased patient care and increased costs to patients. If a merger took place Union would be a monopoly with control over the entire area, harming patients and padding upper level Union management pockets.
Brittany Metcalf	Regional hospital employee	This would be a monopoly. Research has proven that copas decrease quality of care and increase healthcare costs and decrease employee wage. This merge is a bad idea for everyone involved.
Heidi J Sagarsee	Terre Haute Regional Hospital	i am against the merger of Union Hospital and Terre Haute Regional Hospital. Taxes for VIGO COUNTY Homeowners will rise and the cost of our healthcare will also. It seems as a citizen this seems a monopoly.

Undisclosed	Private	<p>Please do not allow this merger to go through! This will tear an already struggling community into pieces. The surrounding communities are going to suffer as well. Taking away the right to choose healthcare is never a good idea. Members of the community will slowly begin to move into areas where they can obtain their freedom to choose healthcare facilities again. Regardless of what Union Hospital says, the healthcare prices will rise and employee wages will suffer. The CEO of Union hospital has a way of presenting one front to the public then doing the opposite to fill his own pockets. This merger should have never gotten this far especially in a community that is already struggling and losing its retailers. Terre Haute, Indiana will become an even emptier shell of what it once was! The quality to patient care will suffer as staff become disgruntled at upcoming pay cuts and start to leave for better paying jobs. The current quality of patient care at Union Hospital does not come close to the quality of care given to patients at Regional Hospital. Please look at the community and surrounding communities understand that this is a HUGE mistake!</p>
Skylar Gomez-Acosta	Terre Haute Regional	<p>The merger between Terre Haute Regional Hospital and Union Hospital is an unwise decision. Not only will it result in non competitive wages for hospital employees in Terre Haute, but it will also lead to low quality patient care with increased healthcare costs. Our already struggling community will suffer as a result of this merger.</p>
Matt Lee	Former HCA employee	<p>Dear Indiana Department of Health, As a practicing Physician Assistant in Terre Haute, Indiana, I am writing to express my strong disapproval of the proposed acquisition of Regional Hospital by Union Hospital. I believe this merger will have significant negative consequences for both patients and healthcare professionals in our community. The merger would create a monopoly in our region, eliminating competition between healthcare facilities. This would likely lead to higher healthcare costs for patients, as there would be no market pressure to keep prices reasonable once the five-year cap on healthcare cost increases, as stated in the COPA, expires. Moreover, without competition, there would be little incentive for the consolidated entity to continually strive for improvements in service lines or the overall quality of care. For those of us working in healthcare, this consolidation is equally concerning. With only one dominant healthcare system in Terre Haute, there would be fewer opportunities for competitive wages. This could result in wage suppression not only for Physician Assistants like myself, but also for physicians, nurses, therapists, and all other healthcare professionals. This would make it more difficult to attract and retain talented staff in the area. In the long term, this would be detrimental to the residents of Terre Haute and its surrounding communities. The Federal Trade Commission has also voiced its opposition to this merger, citing concerns about rising costs for patients and the reduction of healthcare choices. I respectfully urge the Indiana Department of Health to carefully consider these impacts and deny the merger application to protect both patient care and the well-being of healthcare workers in our community. Thank you for your time and consideration. Sincerely, Matthew Lee, PA-C</p>
Nick Bobbitt	Union Hospital	<p>This merger needs to happen. Take a look at the condition of Regional hospital HCA is not doing anything with it elevators have been out of order for years. Water pours thru the roof to the basement. It's in horrible condition. It's going to cost Union Millions just to bring it up to code</p>

Jaycie	Union Hospital/Regional Hospital Merger	<p>This community is too poor and too large to have one hospital providing all the care. I've seen the difference in standards between the 2 and there is a VAST difference. Regional, as a for-profit hospital has higher standards of care and agencies they report to. Union, as a non-profit hospital has very low standards of care and can get away with virtually anything and no one holds them accountable. Why would you take away competition that can force each other to be better and consolidate them altogether so they can sink to the lowest standards? This community needs help but this is not the way to do it.</p>
Ashley Carson	Terre Haute Regional Hospital	<p>Although I have had mixed feelings on the potential merger of Terre Haute Regional Hospital with Union Hospital, I feel it is in the best interest of all employees and community members to welcome the merge of the two facilities. My opinion is that HCA Healthcare has failed to grow Terre Haute Regional Hospital and without this merger, I fear for the future of the facility. Overall census and service line volume has drastically decreased to the point of fearing closure of certain units or overall service lines. There will be challenges with the merge, but overall many other rural communities offer only one choice in healthcare. There are always other options, maybe just outside of a 20 mile radius. Overall, I feel the risk of a diminishing facility outweighs the risk of a merge with Union Hospital.</p>
Chris Newlin	Concerned Citizen	<p>Please look at the data and facts and make the right decision for patients and their families in Vigo County and the surrounding counties, to deny Union Hospital in acquiring Terre Haute Regional Hospital. If you approve this and allow Union hospital to take over Regional hospital, their COPA clearly shows they will be eliminating duplicate service lines and how does that help our community? Their hospital is already overcrowded now. This will make longer wait times to get patients in for services. If you are a person with a heart attack from the southern counties who would come here for cath lab and have a better chance at survival but according to pg 39 in the COPA application, that service would no longer be at the closest hospital and ER. You would have to travel 20 to 25 more minutes North of town trying to get through all the stop lights to get to Union hospital's cath lab. As you are aware, minutes mean survival to a person in that serious condition. Cancer patients will no longer have a close center to receive their radiation treatments per pg 39 that states this will be merged in 1 location at Union Hospital. This means that we will lose our only Mayo Clinic cancer physician in this community. As you know Mayo Clinic is one of the top cancer programs in the country. Dr. Thomas Schmitz has already announced he will not join Union Hospital. Please, I pray you abide by your Indiana Dept of Health Mission statement: "To promote, protect, and improve the health and safety of all Hoosiers," and do not approve this acquisition.</p>

Letisha
Millick

Terre Haute
Regional
Hospital

I have been an employee of Terre Haute Regional Hospital (THRH) for 40 years. I can attest to some of the statements made by Union Hospital in the COPA application are not true. Terre Haute Regional Hospital's oncology service line has consistently received the Press Ganey Awards which is the highest patient satisfaction rating of all the hospitals in the nation. We do deliver efficient care and patients receive timely and comprehensive treatment as demonstrated in our monthly patient satisfaction survey results. THRH has a Google review rating of 4.2 stars, vs. Union's review of 2.6 stars. THRH's Leap Frog hospital safety grade is currently an "A" while Union Hospital's last Leap Frog hospital safety grade was a "C" posted in 2019. The Leap Frog website states that Union Hospital is not currently participating and to contact Union to inquire why they are not releasing their patient safety data. THRH has also been listed on Healthgrades as one of the top 12 Indiana hospitals; Union Hospital is not listed. According to the Department of Health's Mission Statement is to promote, protect, and improve the health and safety of all Hoosiers. The statement made by Union's CEO states that the merger would improve better outcomes and improve the Quality of healthcare in the Wabash Valley area. How does Union expect to improve the quality of care in the Wabash Valley, if they cannot meet THRH's higher quality of care standards over several decades? Since 2020, there are fewer physicians at THRH, because when the talks began that Union Hospital wanted to buy THRH, several physicians left because they didn't want to work for Union. This same statement is true of many THRH employees, as they also choose not to work for Union. Our patients also have choices. Patients want services offered near their homes on the south side of the Wabash Valley. According to the COPA application, Union Hospital will not keep THRH as a fully functioning hospital to meet the demands of Terre Haute and the surrounding region. For example, patients may not be able to receive Trauma services, Cath lab services and Cancer Treatments on the south side of Terre Haute. How can patients expect to receive better outcomes, quality and timely care, if these life-saving services are eliminated at THRH? How can this community benefit from a merger by denying them choices in where they receive care or work??

Donna Cannon	Union Hospital	<p>I am writing to convey my agreement with the Federal Trade Commission that the proposed acquisition of Terre Haute Regional Hospital by Union Hospital should be opposed and the COPA denied by the Indiana Department of Health. Union Health has grown unchecked for the past ten years in quantity of buildings and practices. This unchecked growth has led to higher costs (e.g. assumption of their own laboratory services in November 2021, which lead to "provider-based" billing practices) as well as restricting opportunities for growth for other practices and providers. Union has long promoted themselves as providing "as Quality Health Care" in the Wabash Valley. They have reduced access to healthcare, due to extensive wait times to see providers, family medicine as well as specialists, and patients suffer as a result. Providers are paid based upon productivity quotas, not value based care. Frequently there are multiple appointments scheduled for the same time. They also have a penchant to "terminate" patients that advocate for themselves or want to be proactive in their healthcare decisions. They label such patients as "difficult" and/or "non-compliant". There is little consideration of quality measures and patient safety. Policies are anemic and care is disconnected with communication that is dangerous at times. Union lacks processes and skill sets to lead the Wabash Valley into modern healthcare and transparency. Creating a monopoly with Union Health at the helm will be detrimental to Vigo County and the surrounding areas. Additionally, one health care system in the area will lead to lowered wages for employees and a reduction in benefits. Please, for the sake of the residents of the Wabash Valley, deny the COPA; Union Health is not the organization they present themselves as. Thank you for your consideration.</p>
Diana Mahurin	None	<p>I am very encouraged to hear the FTC has discouraged this merger. As a resident of this area for over 60 years, I appreciate the fact that there is a choice in hospitals and healthcare in the area. I feel like there are so many things at Union hospital that need to be approved and these deficits should not be carried over to regional hospital</p>
Lea erwood	N/a	<p>I oppose the merger due to quality of care at Union . The merger causes people to farther away for quality care.</p>
Kevin Parsons	Kevin Parsons	<p>I don't think they should merge I would not go to the hospital if they merge I don't like union hospital</p>
Gloria Schmidt	Union Health	<p>This will create a monopoly on the health care industry in Terre Haute. This will not allow patients to choose their preferred providers. Living in a surrounding community that has accessed both hospitals according to the providers that I want to use. This will no longer be a choice but a monopoly that the state should never allow to happen. I fear for the staff as they will have no competition for employment. There should actually be laws so this is not an option at all.</p>

Amber Dean	Union health	Union health and th regional should not be allowed to merge. They would then have a monopoly on hospital care in Vigo county and the medical care provided by union health is not in the best interest of the patients.
Chelsea Jones	Private Individual	Union is one of the worst organizations. I live in Vigo County and drive 30 miles to another county to take my children to a Healthcare provider outside of this network because of how their systems are set up. I take them to Indy if they need to see a specialist. I would NEVER allow them to be admitted to Union Hospital. Regional is my only option for emergency care if a crisis arises. My brother was sent home from Union's ER last year with a diagnosis of sciatica. Days later he died from septic shock. So many individuals have reached out to me to tell their experiences of bad care and neglect from Union. Ask anyone in the Wabash Valley and they will tell you that this Healthcare organization is atrocious. They do not need to expand. They need an audit of their practices and a restructure.
Daryl Streeter	Union/Regional hospitals merger.	Iâ€™m opposed to the merger. I will definitely decrease our healthcare In Terre Haute and surrounding area. It would be a monopoly which there are laws against.
Kimberly Worland	Kimberly Worland Vigo County citizen	Iâ€™m 100% against the merger of Union Hospital and Regional Hospital! we cannot have a monopoly in hospital care
Scott Brown	Regional Hospital	NO. This would not be good for the city and community. As an employee of Regional I do not want to see this happen. Union Hospital has already made me give them all my personal information. This includes my SSN, banking information and other personal information. How do I get this back if this does not go through?
Cheryl Rosselli	Regional Hospital	This would be a monopoly and research has proven that copas decrease quality of care and increase healthcare costs and decrease employee wages . Plus the city of Terre Haute would lose the taxes paid by Regional Hospital. I think people are forgetting about that!
Julia McBroom	Self	I do not like the care at Regional Hospital.In my opinion it is a substandard hospital. Too many people I know are worse off than when they went in and some did not make it there that should have.

Robert	Retired	<p>Union Hospital and my and I know others opinions is the worst hospital around here too many stories about people passing away that should have not passed away because it was getting the wrong medicine my father-in-law is giving the wrong medicine and he's 89 years old he will not go back I tried to kill him he he said. Regional Hospital is the best hospital in area they're qualified personnel doctors janitors food workers they're all very respectful in general I cannot say that for you my experience have been with them that rude half of my unqualified in their training doing major stuff in the emergency room. I usually don't comment on things like this but Union Hospital I do not like I know I'm not the only one that feels that way so please keep Regional Hospital the way it is thank you have a blessed day</p>
Christy marts	Regional hospital	<p>I feel like this is a bad idea. What happens when the closest hospital is now 30-40 minutes away and they are having a heart attack.</p>
Susan Hale	Self	<p>I think the community of this size needs two separate health hospitals to choose from!!!</p>
Anonymou s	Self reporting	<p>Protect the community from and surrounding communities from only being able to depend on 1 hospital. Having worked for Union hospital as a bedside nurse, I can say with certainty, patients want to have options. If the merger is allowed to happen, patients will have to travel a great deal to get the care they need. Some will quit seeking treatment due to distaste from Union's organization.</p>

Janet Reed Private Sector I strongly oppose the merger of Union and Regional Hospitals! Just since the rumors started, there have been detrimental changes to our health-care community. Many good doctors and nursing staff have left our community because they refuse to be a part of Union. I know several that left Regional and travel to Paris Hospital in Illinois. I also know some friends that are now commuting to Paris Hospital for services and choosing doctors in that network. Union has never had the best reputation for patient care and keeping physicians. If you talk to most that have lived in Vigo County most of their life, you would find out that most are strongly divided as to the hospital of their choice for various reasons. They were either die hard Regional or die hard Union!!!! No in-between! The quality of health-care care in Vigo County has continued to decline for many years, forcing many to travel outside for medical care. In the early 90's, I think we had excellent health-care providers with many good options. Now, not so much! We have lost several good doctors because of the various politics that Union Hospital has played!! I pray this merger doesn't go through as it will only continue to get worse. A merger would not improve the quality of health-care in our community, but would simply paralyze it!! I would love to see Regional Hospital be purchased by an organization that would put a heartbeat back into our health-care choices. Currently, I only see a primary care doctor in our community and travel to Indy for most medical needs. Most residents I've talked to think this is a "done deal", and that is why many have given up and will not even submit comments. Healthy competition provides choices for people. Allowing the Union Regional merger will only promote a monopoly for our already distressed area. Just look at the quality of health professionals that jumped ship when they thought this was a done deal. Please don't allow this merger to happen!! Thank you.

James Robertson	Hope Crisis Response team	This merger would be very bad for our city once we are a one hospital town the level of care goes to shit. Union needs to concentrate on being a better hospital before trying to own more. Their ER sucks wait times are It's ridiculous. Doctors are rude nurses need are rude. Regional needs to stay.
Bob	Individual	I am opposed to the merger

Michele Sulwer	Union Health, Vigo County	I DO NOT support the merger between Union Health and Regional Hospital. To have a monopoly on the health system in the majority of the western part of Indiana will not help our community. Since the COPA was submitted they have already changed things at Union Health. For example 6 months ago when I paid a bill ahead of a scheduled procedure they would give you a discount price. Now that no longer exists, when I asked an employee they said they just stopped offering it in the last 2-3 months. This is not a coincidence. There are many services that Union doesn't offer and we still have to drive an hour to Indy to get specialty services. As they exist right now the majority of their services are located on the north end of Terre Haute and only just in the last month did they open a south office for Bone & Joint Clinic. There are no therapy services offered through them in the southern part of the county, and they do not offer specialty services for wheelchair prescription or alterations. These individuals have to drive to Indy, and these same individuals usually have the hardest time finding transportation. Please don't let this pass, let another hospital corporation come in and take over Regional Hospital, that will bring new vision, jobs and new services to this region. Regional has washed their hands of this hospital and has let go employees so it is barely a skeleton staff.
Dianna Slaven	Patient	Please don't hurt us local folks any more. We need a break not to be broke.
Katie John hawkins	Citizen Consumer	Union/regional merger should not be allowed to go through I oppose this merger. Most recently the FTC weighed in. According to the FTC, Union and Regional are proposing the merger under a proposed "certificate of public advantage," or COPA. The FTC said, "The COPA could shield the proposed merger from antitrust scrutiny, leading to a deal that would likely impose higher costs and could lead to worse healthcare outcomes for Indiana patients, as well as lower wage growth for hospital workers, the comment states. In Vigo County, Ind., where the effects of the proposed merger would likely be felt most acutely by area patients and hospital workers, the merged entity would have a combined share of nearly 74% of all commercially insured inpatient hospital services." The government continues, "Union Health's proposed acquisition of THRH (Terre Haute Regional Hospital) raises substantial risk of serious competitive harm and there is insufficient evidence to conclude that the potential harms from the merger would outweigh the claimed potential benefits, the FTC's comment states.
Patricia M	Personal	Not an advantage. I'm opposed to the merger of Union and Regional Hospitals of Terre Haute. This is a cost and choice disadvantage for the patient.
Jenny Scott	Regional Hospital merger	I am opposed to the Regional-Union Hospital merger. This is not the best interest of our community. We do not need a monopoly. Healthy competition between two companies is good for business. Regional should remain independent.

Azure	Terre Haute Regional hospital	Based on what I'm reading and the fact that our state is ranked as one of the highest in healthcare costs, I do not feel like this merger would benefit the community. We do need someone to invest in our hospital and recruit primary care physicians as well as speciality physicians. It seems that HCA has no interest in the community. HCA hasn't been able to keep speciality docs. Would be nice to see someone other than Union purchase us. The community wants a choice without having to travel an hour or more away. In addition to this, the monies the county will lose due to Unions non-profit status, is substantial. I haven't heard where they plan to recoup this. Trusting these facts will be kept in mind and carefully weighed.
Debra Bertram	Personal consumer	As a current employee of Regional Hospital and a former employee of Union Health I feel this merger will negatively affect the residents of Vigo County and surrounding areas. The care given at Regional is far superior and patient comments reflect that. I've had numerous patients tell me they came to Regional after receiving less than adequate care at Union. They have also stated if this merger is accepted they will travel to Indianapolis or Champaign - Urbana to Carle Hospital. As an employee I can guarantee I will look elsewhere for employment. I will take my 25 years of dedication & 20+ years of RN experience somewhere other than Union Health.
Jason Karter	Westminster Village	I am fully against the merger of the only two hospitals in Vigo County. The merger would stifle wages, which would cause even worse staffing shortages which would result in inferior care for residents of Vigo and surrounding counties.
April Hunt	THRH	This is not good for our community and our young graduates. I am a 27 year employee of THRH and my daughter, a recent graduate, works for Union. I am not biased. I want everything to succeed. I just don't think this is the way for our community to thrive. My family is local and will continue to come to Regional possibly Union but, as an employee of Regional, I hear daily how much more personable and affordable Regional is. I am more likely to go to St. V before I will go to Union Hospital. They have made themselves too big with the expansion and do not have the staff to support it. I, as an employee of Regional and as a long time patient of Regional, do not want to lose the small town feel we currently have. The economic impact it will have on schools and law enforcement alone are astronomical. I do not live in Vigo county but I can see how this will impact so many. I feel like the state board of health needs to broaden their searches and see that this is not a smart decision for their state. Other states are regretting their decisions that have tried this. We have lost a lot of choices in this day and age and I don't feel like local healthcare should be one of them.

Nora Slade	Union	<p>Union already struggling with lack of staff. Several travelers in placeâ€¦ physician base is dwindling in all areas.. out sourced billing has caused pts to choose other facilities. (Duplicate bills, being turned over to collections with bills paid in fullâ€¦ no billing office on any site) most feel like Union doesnâ€™t have their act together, all the while wanting to manage another facility.</p>
A	concerned resident of area	<p>The acquisition would make it more difficult for residence on the south end of the town to get emergency care in a timely manner. This provides the community with less options for care. Very few people that I have talked to are excited about the prospect Union taking over Regional.</p>
Lisa kehrt	Union hospital	<p>I am a union hospital employee and here are the things you donâ€™t know! 1. Union bought out every lab Corp in town so pts canâ€™t get labs drawn at a fair price. 2. Union also has taken over providence health care and they now have to send their pts for exams to union at in hospital admission fees! They have unfairly bought every clinic and every lab in town which isnâ€™t public yet because they donâ€™t have it officially on the books yet! To let them buy THRH will devastate an already devastatd poor community!</p>
John Campbell	Self	<p>This merger will harm our community. Union already acts as if they have a monopoly while many still have to go to Indy for better care. Regional needs help, but union isnâ€™t the answer.</p>
Joe Smith	Union hospital	<p>The take over of Regional Hospital by Union Hospital would significantly hurt the Vigo County and all surrounding counties,overall both when it comes to healthcare and financially. Union Hospital is viewed as an employer of a lower quality and does not treat its patients or its employees in general that well. Good doctors routinely leave Union Hospital and the area due to its poor management. Union Management is known for its bullying nature and race to the lowest denominator for quality of healthcare as long as the management increases their compensation. It is already the biggest employer in the county and they have infiltrated every segment of the city and county leadership. It has become a mafia business. This merger would ultimately lower the wages of all healthcare employees in the county and lower the quality of healthcare. It will drive away more doctors from the community. Most people in the community do not like Union Hospital, but have no choice but to keep quiet due to its oversized power in the community. Please do NOT allow this merger for the sake of the people of not only Vigo County and the sounding counties, but also for the sake of a stronger Indiana. Please save the people from a bully hospital and its vicious management.</p>

Kurt Warnick	Kurt Warnick	After ER visit to Union, I am now days from an open heart surgery that Union Dr's failed to look into and took my symptoms as Meningitis and nothing related to a congenital heart issue. As someone who has short history in TH as a resident, Union has not shown the same level of care I, or others close to me, have received from other hospitals prior. A merger would make residents, like myself, travel further for other care than Union Hospital and it's clinics.
Carrie Fields	N/A	The existing healthcare structures have not benefited, because Union Hospital exists at all. So them taking over Regional too and leaving us with only them to depend upon would make it far,far worse on the community as a whole. Regional is all we've got and thank God for them. Union treats people terrible. And borders on very abusive. The entire hospital needs shook down. Someone, needs to do something. The people are mean. And at Regional they are their to help you and alleviate your symptoms try to get you better are caring, which is their job in healthcare to do and they do it efficiently. Please do not do that to us, no body wants Union they treat people horrible. They are unprofessional and there to start trouble and gossip rather than help. Them people are terrible. Investigate that please. Thank you
Carla Medlock	Personal patient	I believe the merger IS in the best interstellar of patients, as in the past you had 2 hospital vying for patients. I have almost all my physician WI one hospital group and find it very mind relieving that each of my physicians know what the other are prescribing medicine wise, know my history and are able to see all my labs and anything else they need. Just my opinion.
Malinda Miller	PRN employee of Regional Hospital	I disagree with the approval of the merger of the two hospitals. Residents of Vigo and surround counties deserve the right to make choices about healthcare and their choice of which hospital they choose to receive care from. I strongly urge you to deeply consider the FTC's recommendation to stop the merger. One month is not long enough for the public to weigh in on a decision this large that will affect so many people.

Susan Oard Not associated with any medical office or facility	On behalf of myself, many family members, friends and associates, I am writing in opposition to the merger between Union Health and Terre Haute Regional Hospital. There is growing evidence that consolidation of 2 such entities leads to higher prices without evidence of increase in quality. The Terre Haute area which has a poverty level of 18.5% (national average is 11.5%) already has 31% higher healthcare costs than the national average. A patient can take an hour drive to Indianapolis and receive medical care for a greatly reduced cost. Not only price but it has been a proven decline in clinician morale and patient autonomy. I have witnessed the fact that Union Health has become "factory medicine", somewhat like "factory farming" where the focus is no longer on the patient but on profits although it is registered as a not-for-profit. Not only is it true with their hospital but in provider practices they have acquired in which there has been an obvious decline in patient care/personalized attention and increase in unnecessary care and prices. In the past, both professionally and personally, I have experience with Terre Haute Regional and Union Health, and from my experiences & horror stories my preference is to never receive medical care at the latter. When word was out of the possible merger, Regional lost many reputable physicians, nurses and other staff who informed me they will not work for Union Health or receive treatment there. As a result both hospitals are experiencing staff shortages, staff burnout and inferior patient care. By permitting this merger to proceed you will only create a monopoly for big medicine and remove all consideration for patient care and costs.
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Marianne Bayless Terre Haute Regional Hospital	I continue to have concerns regarding the merger of Union Hospital and Terre Haute Regional Hospital. I presently am employed at Regional as a nurse. I am concerned that Terre Haute and surrounding areas will not have any choice in their medical care. Having a monopoly can not be good. This could become very expensive for the consumers. Many doctors and nurses from Regional do not plan on working for Union. There will be a loss of medical professionals in our area. Please do not let the people of Terre Haute only have one choice for their medical care. The plan to consolidate the ICU, Cath lab and OB will be disastrous. How can you possibly have any kind of hospital without some kind of ICU? Please take all of these things into account when deciding this Monopoly.
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Manda Boyer	n/a	<p>I don't think that the merger should happen for several reasons. 1-it creates a huge medical monopoly in the terre haute area. 2- there are many residents who will NOT ever step into union hospital no matter what, and then some will not go to regional. people deserve to have a CHOICE where they want to be seen for medical purposes. The staffing at union is horrible, the ER has literally turned away serious medical conditions that needed immediate treatment and were told "drive to regional ". They don't have a competent Heart surgeon that will do a major surgery. they only want the "easy" cases. it will GREATLY AFFECT the staffing because many people will leave if the merger goes through. you are not doing this for the community, it's being done for the profit. Also, how can 1 hospital be paid by the county, state and federal government for care of prisoners. they can't.</p>
Robin Smiddy	NA	<p>I have worked in healthcare in Vigo County for greater than 25 years. I have worked for both hospitals. While I agree our community is failing in providing better access to improve health outcomes with the current situation, I do not see how Union monopolizing the market will improve this. They already have a large volume of the market and have not been successful in providing quality care. Union has proven over and over that their focus is on the bottom dollar and not providing better care to their patients. Union health historically has not treated employees well and ultimately show in retention numbers and their inability to recruit providers. In the last several years they have lost several providers because of lack of respect for their years of commitment to their hospital. Not having competition in our community will only make this worse.</p>
Barry Neal	I'm an individual	<p>I oppose Union Health's proposed acquisition of Terre Haute Regional Hospital. The care provided by Union is sub-par (per experience of taking my mother there many times, and also per my own recent experience) and I don't want that same poor service at both of Terre Haute's hospitals. I have a history of heart disease, had 3 stents 15 years ago. I recently found myself in Union's ER with major chest pains and instead of admitting me to the hospital, they sent me home with instructions to follow up with a cardiologist. Three or four days later (before a cardiologist visit was able to occur), I was having a heart cath in Indy for a very serious blockage, including a blood clot. When I received the bill from Union for my ER visit, I challenged it because of the care, or lack thereof, I received. They say they reviewed my claim but I was denied. Please don't let this merger take place!</p>

Andrew Conner	Union Hospital / Regional Hospital in Terre Haute	<p>I am strongly opposed to this merger. It would be anticompetitive, leading to a reduction in health services available, higher costs, and lower wages for hospital employees. Union Hospital does not have a good record with mergers and acquisitions: AP&S clinic was absorbed, then spun off, absorbed again, and separated. This created an enormous amount of bureaucratic paperwork for patients and staff, with no discernible value - evidenced by the on-again, off-again merger status. Union has used its nonprofit status to enrich the administrators and doctors who control it, and has acquired large swaths of land in the surrounding neighborhood. These properties are no longer contributin to the tax rolls, but Union has not followed through on the lofty neighborhood development plans that they announced decades ago. The administrators seem to regard themselves highly, and when rebuilding the main campus, they insisted on closing a major street by placing a new building in such a way that an important transportation artery was severed. This effectively made the hospital the center of a neighborhood that is harder to get around - and harder for ambulances and other emergency vehicles to navigate. It is illogical to suggest that the community would be better served by having fewer healthcare options and less competition. This merger will be bad for the community, and for health care in the region.</p>
Shari L Morgan	TERRE HAUTE REGIONAL/U NION HOSPITAL PENDING MERGER	<p>This merger from two choices to one for healthcare in Vigo Co and surrounding communities would be devastating. This merger states that this would improve primary physician choices. This merger isn't about that, physicians can apply to have privileges at multiple facilities to accommodate their patient's need. It is about the members on Unions Board, local government, local businessmen who benefit from the monopoly this merger will create. Jobs will be lost, cost will increase, surrounding southern communities will not travel the additional distance. Potential for Illinois communities to no longer choose Vigo County as well. Healthcare choices first and foremost. HCA will find a buyer it SHOULD not be Union Health. Union does not need to be given the final power over healthcare in Vigo Co. There are several elected officials who do not live in the community say "yes" I wish they would have a townhall and actually ask those who will be impacted by this COPA.</p>

Ann Brooks	Individual patient of three major specialists connected to Regional Hospital.	<p>I have been a patient of Regional Hospital off and on for 29 years. My family physician, my cardiologist and heart surgeon, and my pulmonologist are all part of Regional. I have utilized their lab all these years. I am 80 years old and am blessed to have these specialists handling my healthcare. I am so pleased with this hospital and its staff. I would be extremely disappointed and frustrated to see a merger. Monopolies are not quality. As an elder patient I feel secure with the opportunity of choice as well as many of my friends. We are very unsettled just thinking about a merger. Quality and satisfaction are never the same when a vast change is made as a merger. Please do not allow this to take place in Terre Haute. We only have two choices now and to be limited to one like it or not is so unfair to our community. I have been an emergency patient at Union once and I was so unhappy with my care. PLEASE do not approve this merger transaction. For me and for many this is personal security of knowing the care we will receive regarding our health care. Thank you for the opportunity to voice our personal opinion. I am praying with my whole heart. I trust my doctors and I trust the medical care at Regional Hospital in Terre Haute.</p>
Kathleen Dailey	Terre Haute resident	<p>I am very opposed to the possible merger of Union and Regional hospitals. The proposed loss of emergency heart care for residents in the southern portion of the Wabash Valley would be devastating. They would have to navigate several railroad crossings to get to emergency heart care on the north side of town. It has been reported that the FTC is opposed to this merger because it will raise already high healthcare costs for patients and lower healthcare workers' salaries.</p>
Tammy Carr-Bailey	Individual	<p>I worry about the quality of care with a merger. Union already lacks reliable care and this merger would equate asking a hungry child to watch the candy jar.</p>

CW

THRH

FTC I wasn't going to make comments, as I felt they were futile, but after reading through the FTC comment from yesterday, I feel compelled to add my thoughts and observations gleaned over the past few years as this "process" has unfolded. 1. The COPA application was written only by Union Health. There was no input from anyone local from the THRH side. It is full of inaccurate information. 2. Union executives thought that writing the legislation and getting it passed via "friends" of Union Health would be the biggest hurdle they faced. They have been caught off guard by the level of interest and are woefully unprepared in their planning and response. 3. The "community support" letters come mostly from highly paid contractors of Union Health. 4. It has been stated verbally that Union needs "at least" 15% of THRH leaders to leave in order to meet "payroll projections" Maybe that's why the COPA application suggested the new casino or battery plant as alternatives for employing all the redundant "back-office" workers. Those would be great local jobs for those with advanced degrees and years experience in healthcare leadership. 5. It's very obvious from all the planning meetings via leadership that there is a "public" plan and then another plan for "when" there's no longer the level of scrutiny Union has absolutely made plans for services and programs that are not public knowledge. They just picked a few vague ones to place in the COPA application.

Dawn Wallace	concerned citizen and employee of Regional Hospital	<p>I agree with the FTC decision that Union Hospital purchasing Regional Hospital would be a bad thing for the community. There is no question that it would create a monopoly in healthcare for the community; there would be no other choice in town. Union has already stated that they plan to shut down some services that Regional currently has such as Radiation Oncology for cancer care and Cardiac care services. For cardiac services, minutes count in saving lives and making patients or ambulances drive farther could foreseeably cost lives. Regional Hospital Radiation Oncology at Siebenmorgan Cancer Center has earned patient satisfaction awards in the 95th percentile or above for 7 years in a row and Union has never achieved that. How could shutting down such a great department be a good thing for patient care? Along with that is increased wait time to receive cancer care at Union because patients would have no other choice unless they leave town. Regional Hospital always earns As or Bs in the National Leapfrog patient Safety grades and Union doesn't even submit their information anymore because their grades are so low. By Union taking over Regional, wouldn't that bring DOWN patient safety and patient satisfaction scores? When one googles ratings, overall Regional receives an average of 4.5 stars over thousands of patient reviews and Union averages 2.2 stars over a few hundred patient reviews. Union claimed that Regional does not have the number of doctors on staff that Union has. Several years ago, when talks first started, many doctors left because they did not want to go to Union. Also, since the announcement in Sept 2023 that Union wanted to purchase Regional, hundreds of staff at Regional have left because they did not want to go to Union. In the first talk that the Union CEO Mr. Holman gave to my group at Regional, he said that basically Union was interested in 'buying the staff' of Regional because Union is so understaffed. With only one option locally for employment, the FTC is correct, it would lead to lower pay scales and less opportunity, and higher charges for patients because there would be no competition for their business. I urge you to decide against the buyout of Regional Hospital by Union. I say that knowing that the parent company HCA obviously wants to sell Regional and we don't know what will happen or what other company might purchase Regional. I just believe that Union making the purchase would destroy good patient care and delay patient services.</p>
Andra white	THRH former employee	<p>I do not support merger of Terre Haute Regional Hospital and Union as this would not be fair to patients with higher rates and nursing would have lower rates as there would be no more competitive rates for patients and staff</p>
Shannon Arney	Terre Haute Hospital	<p>I oppose the Terre Haute hospital merger. I want a choice in my local healthcare. As a healthcare worker I expect competitive wages to support my family in this economy.</p>
CW	THRH	<p>I neglected to mention the most obvious observation: Union doesn't want to acquire THRH-they just don't want any other system to come into the market to compete with them, so it's a defensive move.</p>

Susan Modesitt	Union takeover of Regional	<p>I read the denial from the FTC regarding the COPA arrangement. I believe the Wabash Valley would be better served with a merge from an outside organization (not local) possibly Ascension or IU. Regional is the only hospital HCA has in the state of Indiana and I understand why they would like to free themselves. HCA benefits are great and I would hate to lose them. My vibrant 87 year old mother attends Wabash Valley Activity Center events and has relayed to me the negative feelings her bingo buddies have towards this merger. I truly believe this Acquisition is not in the best interest of the Wabash Valley and the patients we serve. A monopoly in healthcare, or any business should not be tolerated. Thank you for listening</p>
Zack Cooper	Yale University	<p>Union Hospital, Inc. (Union Health) is proposing to acquire Terre Haute Regional Hospital, L.P. (Terre Haute Regional Hospital). In their application for a Certificate of Public Advantage (COPA), Union Health and Terre Haute Regional Hospital have argued that this transaction would improve local health, raise efficiency, and increase quality without raising costs for consumers or harming access to care. This transaction involves two hospitals located approximately five miles apart. The next nearest hospital is located approximately 20 miles away. This public comment draws on the extensive evidence of how transactions of this type and similar COPAs have impacted hospital prices, hospital quality, access to care, and the health of local populations. The comment also draws on my recent work assessing how transactions like the proposed Terre Haute Regional Hospital and Union Health merger impact hospital prices, health care spending, insurance premiums, local wages, and employment (Brot-Goldberg et al., 2024; Brot-Goldberg et al., forthcoming). In this comment, I will also describe how evidence from past mergers and other states’ experiences with COPAs can inform the Indiana Department of Health’s assessment of how the outcomes from this proposed merger relate to the standards for issuing a COPA outlined in Indiana Code Â§ 16-21-15. Context: I am health economist who studies hospital competition and the functioning of health care markets. I am an Associate Professor of Health Policy and Associate Professor of Economics at Yale University. I have written a number of academic articles assessing the impact of hospital competition on clinical quality and provider prices and have also studied the impact of hospital mergers on hospital prices, health spending, and economic growth in local communities (Cooper et al., 2011, Cooper et al., 2019, Cooper et al., 2022, Brot-Goldberg et al., 2024, and Brot-Goldberg et al., forthcoming). I have presented my work on hospital competition and mergers at the U.S. Department of Justice (DOJ), the Federal Trade Commission (FTC), and White House, as well as in numerous states. I have testified about hospital competition and mergers before the U.S. Senate. Overview: Based on my nearly 20-years of studying hospital competition and hospital mergers, I firmly believe this merger would harm members of the public in Terre Haute and Vigo County. This transaction will meaningfully lessen competition and would create a new merged entity that will have a local market share, depending on how it is measured, that ranges from approximately 75% to approximately 100%. Across a range of approaches for measuring the changes in market concentration that this transaction would, this merger would run afoul of the Department of Justice and Federal Trade Commission 2023 Merger Guidelines. Based on my analysis of hundreds of mergers and evidence from past COPAs, this transaction is unlikely to improve the quality of care patients receive, is unlikely to meaningfully impact public health, will raise health care spending locally, will lower local access to care, and will lead to overall reductions in local income and employment in the area. The academic literature on hospital mergers that were granted COPAs also highlights that the quality of care at the merging facilities tended to fall (Garmon and Bhatt, 2022). Based on what the academic evidence suggests about the likely impact of the Terre Haute Regional Hospital and Union Health merger, my assessment is that the transaction would not achieve the goals described by the applicants and would generate more local costs than benefits. That is, the merger would not meet the approval standards outlined in Indiana Code Â§ 16-21-15. My analysis of the merging parties’ application and the relevant protections included Indiana Code Â§ 16-21-15 also lead me to believe that the protections afforded to consumers via a COPA would not obviate the substantial harms this transaction is likely to induce for consumers. My estimates are that this merger, even if a COPA were granted, would raise commercial prices by between 10% and 30%, raise local insurance premiums by 3% to 10%, lower wages in the area across health care and non-health care workers by 1%, cause approximately 500 job losses outside the health sector, and precipitate one to two excess deaths in the community from suicide or overdose. These suicides and overdoses stem from the job losses among workers outside of the health care sector that this transaction would generate. The</p>

collective economic harm from this transaction over a two-year period would be approximately \$50 million, and the harms would continue to accumulate beyond this two-year timeframe. These harms do not include the reduction in local tax revenue that would result from this merger that stems from the fact that it transitions one of the merging parties from a for-profit entity (who therefore pays property taxes) to a non-profit entity that will have significant tax concessions. Because this transaction would raise prices and, in turn, out-of-pocket costs for consumers, it would also meaningfully harm access to care for residents of Vigo County. Standards for Assessment: Indiana Code Â§ 16-21-15 states that COPAs shall be granted if: (1) A hospital merger may benefit the public by maintaining or improving the quality, efficiency, and accessibility of health care services offered to the public. (2) Benefits resulting from a hospital merger may outweigh any anticompetitive effects of joining together competitors, including addressing unique challenges in providing health care services in rural areas. (3) It is in the state's best interest to supplant state and federal antitrust law with a process for regulatory approval and active supervision by the state department, as provided in this chapter. (I.C. Â§ 16-21-15-0.5). Statement of Merging Parties on Competition: The applicants state on page 58 of their COPA application that, "the Transaction will enhance competition" and that "this proposed Merger will result in higher quality and improved access to health care without any undue increase in health care costs because it will not result in a meaningful reduction in competition for inpatient and outpatient services in the region." On page 58, the merging parties underscore the value of competition when they write, "competition is valuable because it can benefit consumers. The principal objective of antitrust policy is to maximize consumer welfare by encouraging firms to behave competitively." If the merger is consummated, the net effect will be to promote, not lessen, the traditional benefits of competition in UHI and THRH's geographic service areas. Impact on Competition: It is unclear how the merging parties arrived at the conclusion that this merger would promote competition. Their assertion is inconsistent with standard economic theory. Unlike what the parties assert, my assessment is that this transaction would substantially lessen competition in the hospital market in Terre Haute, Indiana, and Vigo County. The dominant measure of market concentration used by the DOJ and the FTC is the Herfindahl-Hirschman Index (HHI) (Department of Justice and Federal Trade Commission, 2023). HHIs range from 0, indicating a perfectly competitive market, to 10,000, which reflects a monopoly market. According to their recently updated 2023 Merger Guidelines, the DOJ and the FTC define a market as highly concentrated if it has a HHI greater than 1,800. As the DOJ and FTC also note, "a merger that creates or further consolidates a highly concentrated market that involves an increase in the HHI of more than 100 points is presumed to substantially lessen competition or tend to create a monopoly" (Department of Justice and Federal Trade Commission, 2023). Moreover, the agencies note that "a merger that creates a firm with a share over thirty percent is also presumed to substantially lessen competition or tend to create a monopoly if it also involves an increase in HHI of more than 100 points" (Department of Justice and Federal Trade Commission, 2023). There are multiple approaches to defining the market for hospital care in Vigo County. Irrespective of the strategy used to assess market concentration, this merger would run afoul of the standard merger screening. Using a standard market definition based on a twenty-mile radius drawn around hospitals, the merger of Terre Haute Regional Hospital and Union Health would raise the local HHI in Vigo County from approximately 5,000 to approximately 10,000. In other words, the merger would shift the local market from a duopoly to a monopoly and create one firm with nearly 100% of the market. According to the DOJ and FTC Merger Guidelines, this type of transaction would likely raise prices and adversely impact quality due to a lessening of competition (Department of Justice and Federal Trade Commission, 2023). Using a wider market definition based on local patient flows, this merger would raise the local HHI from approximately 3,500 to approximately 5,500 and

...create a combined entity with a market share of approximately 75%. This latter approach also implies that the transaction would meaningfully lessen competition.

Health Care Quality: On page 61 of their application, the applicants state, “Furthermore, with regard to the provision of quality health care services particularly, it is well established that there is a materially positive correlation between hospital volumes and better outcomes across a wide range of procedures and conditions. The patient volumes at Post-Merger [sic] Union Hospital will be greater than the pre-Merger patient volumes at Regional Hospital, or the pre-merger patient volumes at Union Hospital. Consistent with the findings of various studies, this increased volume will operate to improve the quality of care provided by Post-Merger [sic] Union Hospital.”

Contrary to what the merging parties suggest, the best available evidence suggests that hospital mergers involving COPAs have led to reductions in quality (Garmon and Bhatt, 2011). The merging parties also misinterpret the implications of the evidence on the relationship between provider volume and quality. The applicants accurately note that the academic literature has found a positive correlation between hospital volume and hospital quality. However, this does not mean that a merger that raises hospital volume will causally lead to higher quality. Instead, the academic literature suggests that mergers largely do not impact clinical quality (Mariani et al., 2022). While there are returns to being large, the literature suggests that this correlation is explained by the fact that better hospitals tend to grow more over time (Chandra et al., 2016). Contrary to what the merging parties assert, there is scant evidence that mergers raise clinical quality and, if anything, reviews of the literature indicate that the relationship between mergers and quality is modestly negative (Handel and Ho, 2021). Within the literature, for example, Beaulieu et al. (2020), published in the *New England Journal of Medicine*, examined 246 acquired hospitals between 2009 and 2013 and concluded that “hospital acquisition by another hospital or hospital system was associated with modestly worse patient experiences and no significant changes in readmission or mortality rates.”

Moreover, there is a clear negative relationship between competition and mortality -- that is, hospitals facing less competition tend to have higher death rates. Kessler and McClellan (2000), Cooper et al. (2011), Gaynor, Moreno-Serra and Propper (2013), and Gaynor, Propper and Seiller (2016) all study the relationship between competition and quality and conclude that hospitals facing more competition have higher quality and lower death rates. Garmon and Bhatt (2022) examined the impact of hospital mergers subject to COPAs prior to 2015 on clinical quality. They show that the change in market power from these mergers led to reductions in hospital quality. For example, following the Southern Maine Medical Center and MaineHealth merger, mortality rates for heart attack, heart failure, and pneumonia increased. The authors concluded that their general finding “is that COPA-regulated hospitals may experience reductions in quality.”

In their discussion of a second merger with a COPA, they also state that, “after Phoebe Putney’s acquisition of Palmyra Medical Center, quality declined across most measures.”

Health Improvement Initiatives: Union Health and Terre Haute Regional Hospital’s COPA application notes that they will introduce a number of community health programs. In their application, Union Health and Terre Haute Regional Hospital state that Union Health “has implemented, and plans to implement, a number of innovative health care initiatives that are not typically associated with routine clinical care, but which nonetheless improve the health status of, and access to quality care by, patients and the public at large” (page 20). These sorts of claims are often found in COPA applications (Garmon and Bhatt, 2022). However, once the parties merge, the reduction in competition generated by the transaction will eliminate the economic incentives for the merging parties to follow through on their commitments. It is therefore important to note, as the merging parties note on pages 25, 26, 27, and 28 of their COPA application, the majority of their public health and community initiatives have not yet been implemented and will only commence after the transaction is completed.

Past experiences with COPAs in

been implemented and will only commence after the transaction is completed. Past experiences with COPAs in other jurisdictions should inform the state's assessment of the likelihood that Union Health and Terre Haute Regional Hospital's merger will lead to public benefit. In 2018, Mountain States Health Alliance and Wellmont Health System merged to form Ballad Health System. Their COPA application included pledges to invest in public health programs (Mountain States Health Alliance and Wellmont Health System, 2016). Five years after the merger was completed, Kaiser Health News published an article titled, "These Appalachia Hospitals Made Big Promises to Gain a Monopoly. They're Failing to Deliver," in which they outline how Ballad, the newly merged entity, failed to fulfill their pledged charity care obligations, did not meet the majority of their quality benchmarks, and engaged in aggressive debt collection (Kelman and Liss, 2023). Efficiency: The applicants note on page 4 that "combining the management and back-office operations at a single location will maximize the coordination and efficiency of management and other administrative services, including communications across the Combined Clinical Platform"; once consolidation is completed, shared services expense is expected to be reduced by \$2 million annually. On page 43, the applicants state that "the Merger will produce reductions in health care costs over time, and these savings will largely result from improvements in care coordination and reductions in redundant back-office operations. The merging parties' assertions about efficiencies are inconsistent with the academic evidence. For example, Schmitt (2017) examined the impact of hospital mergers between 2000 and 2010 on cost savings. Schmitt found evidence of cost reductions. However, these reductions were only present in transactions where the merging parties were not located nearby and hence were not competitors. Their findings echo earlier work by Dranove and Lindrooth (2003). Given the change in market structure that the merger of Union Health and Terre Haute Regional Hospital will generate, this transaction is unlikely to generate sufficient competitive pressure to incentivize the merging parties to materially reduce costs. Health Care Prices: There is an extensive body of evidence, summarized in Handel and Ho (2021), that shows that hospital mergers involving parties that are geographically proximate generally raise prices. In my work, for example, we find that mergers involving close competitors generally lead to price increases of 5% or more (Cooper et al., 2019). Likewise, Brot-Goldberg (forthcoming) highlight how hospital mergers that raise the HHI of merging parties by more than 200 points and result in a post-merger HHI of over 2,500 points lead to price increases of, on average, more than 5%. The Union Health and Terre Haute Regional Hospital merger would raise the local HHI by approximately 5,000 points. My conservative estimate is that this transaction would raise local prices by 10% to 30%. Critically, I.C. Â§ 16-21-15 does include limits on growth of providers' charges. However, the vast majority of the contracts hospitals negotiate with insurers are wholly unrelated to providers' charges (Cooper et al., 2019). As a result, it is highly likely that, even with a COPA in place, the newly merged Union Health and Terre Haute Regional Hospital entity will substantially increase their negotiated prices. To that end, as the applicants state on page 65, "as a threshold matter, it is important to note that, if the COPA is granted, Post-Merger Union Hospital will be prohibited, pursuant to I.C. Â§ 16-21-15-7(c), from increasing the charges for individual services by more than the increase in the preceding year's annual average of the Consumer Price Index for Medical Care, as published by the federal Bureau of Labor Statistics." This prohibition limits the Hospital's charges, and consequently, limits the Hospital's ability to use its charges as a basis for negotiating higher reimbursement rates with payors. Here, it is vital to note that, in their application, the merging parties do not assert that the COPA will limit the growth of the prices they negotiate with payers or the prices of any of their value-based or alternative. Instead, they state that it will limit their ability to use charges as a basis for negotiating higher reimbursements. As a result, the protections included in I.C. Â§ 16-21-15-7 are unlikely to thwart substantial growth of the actual transaction prices that the merging parties negotiate after

are unlikely to thwart supernormal growth or the actual transaction prices that the merging parties negotiate after the transaction is completed. Access: Because the Terre Haute Regional Hospital and Union Health merger is likely to markedly increase the combined entity's negotiated prices, the transaction will also lead to an increase in patient cost-sharing. There is clear evidence that when cost-sharing increases, individuals reduce their use of health care services. As a result, it is likely that the proposed merger will reduce access to hospital care for residents of Terre Haute and Vigo County (Brot-Goldberg et al., 2017).

Impact on Workers: On page 40 of their application, the applicants state that "the Merger is not expected to result in material cost reductions attributable to employee departures." However, when hospitals gain market power, they also gain the ability to negotiate lower wages with workers. Prager and Schmitt (2021) show that, following a merger where the merging parties gain market power, nurses' salaries drop by approximately 7%. This is an average estimate across mergers, and, given the substantial increase in market concentration that the merger in Terre Haute is likely to generate, it is likely that the Terre Haute transaction could lead to wage reductions for nurses of 10% or more.

Impact on the Local Community: The majority of working-age adults in the U.S. get their health insurance from an employer. When the price of hospital care goes up, it raises insurance premiums. In the presence of employer-sponsored health insurance, this increase makes it more costly for non-health care firms to retain workers. Brot-Goldberg et al. (2024) --- work where I am a coauthor --- studies the impact of rising hospital prices caused by hospital mergers on local wages and employment. Our work shows that when hospital prices go up, local firms reduce the count of workers they employ and local incomes go down. Moreover, the research highlights that it is middle-income workers who are most likely to become unemployed. Our results suggest that, when applied directly to this transaction, if the merger between Terre Haute Regional Hospital and Union Health led to a 10% increase in hospital prices, it would decrease local wages in Vigo County by approximately \$36 million and lead to a net reduction in 300 to 800 local job losses. These job losses would be concentrated among middle class workers employed in jobs outside the health care sector. A growing literature highlights how losing a job and becoming wholly separated from the labor market can have devastating health consequences and increase short-run mortality (Eliason and Storrie, 2009; Sullivan and von Wachter, 2009; Pierce and Schott, 2020; Venkataramani et al., 2020). The rise in mortality following job losses generally stems from a surge in overdoses, vehicular accidents, and self-harm (Eliason and Storrie, 2009 and Venkataramani et al., 2020). Consistent with this literature, Brot-Goldberg et al. (2024) find that, following price increases from hospital mergers, approximately 1 in 140 of the individuals who lose a job and become separated from the labor market die within a year from a suicide or an overdose. I estimate, based on that work, that the merger between Terre Haute Regional Hospital and Union Health would lead to one to two excess deaths from suicide or overdose.

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Jane Curley	Private Citizen	I oppose this merger. Recently hospitalized for aspiration pneumonia after routine Colonoscopy. That should not have happened. Then I get a non itemized bill for around 21,000. Please do not leave us with only Union Hospital.
Diane Rogers	Union Hospital Merger	I would like to vote against the merger as Union can barely staff their hospital the way it is and provide appropriate care. I do not feel they can manage both Regional and Union and provide the level of service the public needs. It needs to remain competitive to benefit the people and service workers.
Jennifer Willis	None	This merger will be devastating to healthcare recipients in the vigo county area and surrounding counties. Monopolies cause higher cost of care to recipients, longer wait times for acute care and likely result in death for those who are having STEMIs, brain bleeds, or traumatic injury needing immediate care. Closing Terre Haute Regional Hospital ICU and ER will result in devastating outcomes for those aforementioned individuals and the drive is an additional 45-60 minute drive for care. I left Good Samaritan Hospital for this very reason, lack of in house specialists and lack of timely care. Monopolies aren't good for anyone other than corporate heads, nurses will be driving further to work in their specialty areas, more exhausted due to longer drives to work and back and there likely won't be positions for every nurse currently working at both hospitals, leaving many without a job. This needs to be denied!
Monica	Self	I think it wouldn't be fair for the merge of the 2 hospitals cause it gives you no option except for 1 or 2 hr drive and those with chronic illnesses more stress of getting the care they need not to mention travel arrangements
Cindi Marietta	Union Hospital	I do not understand how the FTC can judge this merger as being a financial burden on the Wabash Valley, when Terre Haute Regional Hospital is a for-profit hospital and does not accept Medicaid patients - they are turned away, along with those without any insurance, and Union Hospital NEVER does this.
Kelsey Johnson	HCA	Do not allow merger
Amy Anderson	Union hospital merger	I strongly oppose this merger due to poor outcomes at Union hospital. They merger would be complete control of health care choices, fees and providers.
Kelly Gilbert	No organization	As a private individual and healthcare worker myself, I feel this is a bad idea. One hospital should not have the monopoly for healthcare for the entire Wabash Valley. This hospital would then be able to not only control what is done and for whom, but pay rates would no longer be competitive in this already struggling economy. Please do not let this happen!
Brooke Little	Carle	Z
Teresa Hendrixson	Union hospital	I vote No for union/regional merger

Anonymou s Na	<p>Totally agree with the FTC on denying this acquisition of Terre Haute Regional Hospital by Union Health. First, this is not a merger but an acquisition. If it is approved, HCA will not be involved in any of the management of the care and direction of the population Union health will serve. This acquisition will be detrimental to the quality of care and the efficiency of the available care to the Wabash Valley. The FTC finds the acquisition a detriment not only to the quality of care but to the cost of healthcare in the area. Healthy completion is always good and should be continued. Please STRONGLY consider the FTC's stance on this acquisition. And not grant it. HCA will sell the hospital. But selling it to a different health care system would preserve the choice for the people of the area and increase the quality of care and preserve the growth of the Healthcare and opportunities in the area. Please pay attention to the people of the area and the FTC and deny this acquisition. Thank you.</p>	
Jessica Napier	Jessica Napier	Vote No against the merger!
Mary Ann Newell	Union/ Regional merger	I am against the COPA/ merger
R Lock	Concerned Resident	<p>To whom it may concern, Please take an in depth look at all of the data concerning the possible merger of Terre Haute Regional Hospital and Union Hospital. If this is approved it is clear that according to the COPA they will be eliminating many service lines in the south end of Vigo County. Terre Haute Regional Hospital is a full-service facility with some of the highest quality and safety scores in the state. Union has not published any Leap Frog scores since 2019. Terre Haute Regional is certified with The Joint Commission (TJC) and Union is not. They measure and assess performance within the hospital to provide the highest quality patient care. Terre Haute Regional has always provided that type of care and they have always followed the National Patient Safety Goals with TJC. Terre Haute Regional has had to help provide services and recent medication shortages to Union. Terre Haute Regional has a national supply chain and Union does not. Costs for the community would obviously increase. During Covid Terre Haute Regional and Union Labs worked together to provide the best care for the community. One facility would not have been able to handle that pandemic alone and that is a fact. Terre Haute Regional services many surrounding southern counties and provides many service lines that other facilities do not have. Moving these service lines to northern Vigo County would not be beneficial to our community. Minutes means survival to many serious patients. Terre Haute Regional's Vision Statement: Our promise is to provide the highest quality, compassionate care for every patient every time. Regional is committed to the care and improvement of human life. Patients have always come first and affirm the unique worth of each individual. We hope you will make your decision and follow your Mission Statement by promoting, protecting and improving the health and safety to the State of Indiana and our community.</p>

Larry Taylor Concerned citizen	Leave it the way it is we don't need a merger!
Christophe r Ellingsworth h Healthcare/re gional hospital terre haute, in	My comments are please deny this COPA it was all a plan of Mr. Holman he has put a lot eggs in this basket that he thinks you are a rubber stamp for his wants we don't want or need this merger in terre haute the polls taken locally range nearly 75 percent against this finally Hca healthcare owns regional hospital and nearly 200 more hospitals it can easily sell to a different healthcare system that is not located 3 miles away from regional hospital also way would the city of terre haute want to loose \$500,000. In property taxes? Which would happen with this crooked deal makes no real sense other than union health wants to grow it's system well buy a hospital not 3 miles away from you
Melissa Citizen	I don't think it's necessary. Union doesn't need a monopoly on all local healthcare
Carrie Ham .	Union released a statement today saying that u ion and regional are working together to "make healthcare better" This is false statement as regional is working with them just because they want sold. Have they asked regional employees and doctors how they feel about this because it is not all positive so I am not sure how they can say we are together. Also they say Vigo county healthcare is not good in rankings but union runs most healthcare in Vigo county already so how is owning another hospital going to change this? And how will it create more jobs? We have already had staff leaving Vigo county. Some Drs have said they are leaving if this merger happens so I don't see how this will create more jobs! Seems like this is just lining certain people's pockets in Vigo county and not what the actual community needs. I do understand that regional needs to be looked at for purchase due to HCA not wanting it anymore and not taking care of it as it once was but it needs to be bought by another hospital. If this was a great thing it would not be going on a year now for people to understand that it was great or for the COPA to be approved.

Roland Kohr	Private citizen	<p>I am writing to oppose the acquisition of Terre Haute Regional Hospital by Union Hospital. I have been a physician practicing in Terre Haute since 1984. During this time, I have witnessed many instances of a disparity between medical service offerings between the two institutions. Although Union was always the largest institution, it always seemed that Regional was the one that brought new services to the community. The first Radiation Oncology program that was introduced was by Regional. The first Cardiac Cath program was introduced by Regional. The first open heart surgery program that was introduced was by Regional. The first Hospitalist program that was introduced was by Regional. The ultimate discrepancy occurred in 2015, when Regional announced that it was going to start a Level II Trauma program for the community. In response, Union Hospital immediately announced that they would start a Level III program, knowing that approval of such a program would require minimal effort compared to that for a Level II Program. The direct effects of this response by Union created several results. First, Union Hospital began promoting that they were the first trauma program in the community, while totally disregarding the fact that a Level III program took minimal effort, and provided a far lower quality of care than that of a Level II program. However, the biggest result was that by introducing a Level III program, they were able to divert many trauma referrals away from Regional. This had the ultimate effect of decreasing the volume of trauma being sent to Regional, which reduced the number of cases which would have provided the necessary volume to sustain the special resources and physician specialties necessary to maintain a Level II program. By doing this they intentionally sabotaged the Level II program offered by Regional, resulting in Regional ultimately having to revert to a Level III. The bottom line, was that rather than Terre Haute and the surrounding community having access to a strong Level II Trauma program and specialists that would improve the level of trauma services in a several county area, we now have two inferior Level III programs. We no longer have Neurosurgical trauma, or Orthopedic trauma specialists, meaning that the majority of these trauma cases now have to be sent an hour away to Indianapolis. The lack of access to these specialties has put numerous patients at risk of death. This illustrates better than anything else how the goals of Union Hospital are not about improving the quality of care in the Terre Haute area, but about eliminating competition so they might have market dominance. Once that is achieved, if the acquisition is approved, Union will have no further incentive to introduce any new or innovative health care offerings to our community.</p>
Carlos Belmar	Union health	<p>I believe Giving control of a Major portion of West/Southwest Indiana healthcare To one soul, chief executive officer will completely stifle competition and give too much power to one individual. Already Union health is the biggest employer in the region. it would give one single individual too much power over the control of doctors, nurses, Allied healthcare professionals, and technicians. Call these employees deserve a choice when seeking employment, not a monopoly. all these healthcare professionals That have dedicated their lives to the community deserve to have a choice</p>
Paula Jean Bays	Self	<p>I do not want union and regional hospital to merge cause union sucks ass I took my daughter to union hospital and was not treated right at all never seen a dr all they done was a cat scan and exray and gave her a tylenol for a head injury with a huge goose egg on back of her head and sent her home all with in a 3 hour period we also had to wait in er waiting area no room and people in halls in er I love regional they treat there paitence with care and there paitence see a dr and a dr explains what's going on shows us the exrays and cats scans and explains what to watch for I didn't get reassurance on what to watch for or what could happen all I know it's been two days and my daughter still haveing issues with her head</p>

Mary payne	TH regional hospital	This will not be good for TH. Union already owns a lot of property in TH and pays no property taxes and they keep buying more land. They already have a monopoly on TH by "owning" most of the providers. Who are not "allowed" to use regional hospital for services that could be provided that would much more convenient for patients. But patient care is not their concern, making money is only interest. Providers are not allowed to save any open appointments for acute care patients day of need, thus is monitored very closely and doctors are reprimanded is
Donna Osborn	Private	It is with great interest that I read Union Health's public Comment following the FTC's recommendation to deny this COPA application. If Union Health has such an innovative and comprehensive plan to improve the quality of health care for this community, why have they not done it in the past 10-15 years that they have been promoting themselves as the leader in quality health care? Their systems are archaic and the data they submit is manipulated to present a more favorable picture than what is real. Ask for their most recent quality measures and compare. They do not provide quality care and do not have the knowledge, expertise, resources, or skills to move healthcare in the direction this community deserves. If so, they should have demonstrated it already. Buying their competitor is their way of eliminating any potential improvement. Citizens deserve more.
Lindsay Robbins	Terre Haute Regional Hospital	It is my understanding that the COPA requires both Union Hospital and Regional Hospital to be a participating trauma center. However, Regional Hospital ended their trauma services on August 1, 2024. I was one of the staff members affected by the closure of their trauma program. This decision to end services is devastating to our community.

Hayne

Concerned
citizen

Now lets see if ISDOH will do the right thing & keep politics out of it! It was always about the \$\$, not quality patient care! shame on those that put this in motion!! FTC Staff Opposes Proposed Indiana Hospital Merger Union Health's proposed acquisition of Terre Haute Regional Hospital via a Certificate of Public Advantage application should be denied, FTC comment states Today, Federal Trade Commission staff submitted a comment urging the Indiana Department of Health to deny an application that seeks to combine Union Hospital, Inc. (Union Health) and Terre Haute Regional Hospital, L.P. (THRH). Union Health and THRH are proposing to merge under a proposed certificate of public advantage, also known as a COPA. The COPA could shield the proposed merger from antitrust scrutiny, leading to a deal that would likely impose higher costs and could lead to worse healthcare outcomes for Indiana patients, as well as lower wage growth for hospital workers, the comment states. In Vigo County, Ind., where the effects of the proposed merger would likely be felt most acutely by area patients and hospital workers, the merged entity would have a combined share of nearly 74% of all commercially insured inpatient hospital services. Union Health and THRH filed a COPA application in September 2023, and then submitted additional information to the Indiana Department of Health in response to multiple information requests. The Indiana Department of Health has invited public comments , and will continue to accept them through Friday, September 6. COPAs are regulatory regimes adopted by state governments that are intended to displace competition among healthcare providers. The FTC has a long history of advocating against the use of COPAs through comments and testimony submitted to state legislators and other stakeholders due to concerns that COPAs facilitate hospital consolidation and substantially reduce competition in healthcare markets. Union Health's proposed acquisition of THRH raises substantial risk of serious competitive harm and there is insufficient evidence to conclude that the potential harms from the merger would outweigh the claimed potential benefits, the FTC's comment states. The Indiana state legislature passed the Indiana COPA Act to allow hospital mergers that "may benefit the public by maintaining or improving the quality, efficiency, and accessibility of health care services offered to the public." However, Union Health's proposed deal with THRH would allow for anticompetitive consolidation in a highly concentrated market, thereby undermining the goal of improving healthcare services in the state, the FTC's comment states. It is doubtful that the COPA regulatory conditions imposed by the Indiana Department of Health would effectively mitigate all of the potential anticompetitive harms to patients in the Terre Haute area " both in the near term and in the decades to come, the comment further adds. Additionally, FTC staff evaluated the financial conditions of Union Health and THRH, and concluded that both hospitals are financially stable and able to continue operations absent the proposed merger. FTC staff also performed a labor analysis and determined that the proposed merger would likely depress wage growth for registered nurses due to increased employer consolidation. In recent years, FTC staff has seen a resurgence in COPA laws. In 2017, the FTC announced a policy project to assess the impact of COPAs on prices, quality, access, and innovation for healthcare services. This project has included research of past COPAs, a public workshop highlighting practical experiences with COPAs and related policy considerations, and an ongoing study of those that have been recently approved. The studies of past COPAs have revealed significant increases in commercial inpatient prices, as well as declines in quality of care. More broadly, access to affordable healthcare is of the utmost importance to American consumers. Promoting competition in the healthcare sector is a key priority for the FTC, including preventing anticompetitive hospital mergers. The Commission vote to submit the staff comment to the Indiana Department of Health was 5-0. The Federal Trade Commission develops policy initiatives on issues that affect competition, consumers, and the U.S. economy. The FTC will never demand money, make threats, tell you to transfer money, or promise you a prize. Follow the FTC on social media, read consumer alerts and the business blog, and sign up to get the latest FTC news and alerts. Contact Information Media Contact Victoria Graham Office of Public Affairs 415-848-5121

Edward Johnston	Regional Hospital	<p>Union Hospital acquisition of Regional Hospital will not improve the quality of care in the Wabash Valley. Safety is no accident but requires a strong commitment of management and staff. The procedures in place must be to report all concerns and issues, investigate and then implement changes in policies or procedures. In a hospital setting many care givers must interact and transfer all data correctly to achieve a positive outcome in an ever-changing healthcare system. Regional Hospital has maintained higher Health Safety scores documented by several Health Organizations including Leap Frog and Healthgrades. The combining of programs can be more cost effective but harder to improve quality with the increased patient volumes. Union Hospital stated it needs Regional's employees. The most effective way to hire and maintain quality employees is to improve their working conditions, salary and the care their patients receive. Healthcare workers that are committed to their patients want to know that management and staff are as committed as they are. If the acquisition is not approved there is a high probability that the hospital that acquires Regional will bring in additional Doctors and staff to maintain our high quality of care. The facility that acquires Regional will invest in the community. Union's focus will shift from eliminating the local competition to hopefully improving their own quality. It is not in the best interest of the residents of the Wabash Valley to remove their options for local Healthcare since many of them may not have the knowledge or means to drive over 70 miles out of town to a facility with a high Healthcare rating.</p>
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Melanie Miller	Terre Haute Regional Hospital, Siebenmorgen Radiation Oncology Department	<p>I am not in favor of the proposed acquisition of Terre Haute Regional hospital by Union hospital in Terre Haute. I have been an employee of Regional hospital for 38 years. Not only have I been an employee but also a patient numerous times for my cardiac condition. I had triple bypass in January of 2009, and have had 4 cardiac stents placed since. My grandchildren were born here due to highrisk issues. I live in Sullivan County Indiana and find that Regional hospital is a good hospital to work at and to be a patient that is close to my home. I work in the Radiation Oncology department as an oncology certified registered nurse. We have been told that our radiation oncology department will be closed and merged with the Hux Cancer Center at Union. I feel that this move would be a great disadvantage and disservice to the patients we treat to the south of Regional. We have many patients who come from Sullivan County, Greene County, Southern Vigo County, and Crawford Co in Illinois. US Highway 41 brings patients from the southern counties almost to our front door. They do not have to "wrangle" numerous traffic lights in order to reach our hospital. If Union will be their only local choice for Oncology care, they will have the added stress of fighting traffic and increased drive time to get to their treatment center. Union is not in the best neighborhood of Terre Haute either. They do not have convenient parking for their center. Many of our patients are elderly and cannot walk long distances from parking lots to the treatment center. Regional parking is right at the door. We even have a covered canopied entrance where patients can be conveniently dropped off to avoid inclement weather. I also worry that the patients who would need critical cardiac care from these southern counties, including myself, would not reach Union hospital in time if it is left to be the only hospital choice in this town. The south end of Terre Haute and the southern Indiana counties and western Illinois counties that we service need this hospital. I do not oppose Regional being bought by another entity, but I do not see how this monopoly by one local hospital will benefit the citizens of the Wabash valley. Please weigh all of the concerns voiced by many citizens concerning this merger. Do not let healthcare in this community be monopolized by one hospital.</p>
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Mary McDonald	Concerned citizen	Living in the area for my entire life I have been to both hospitals. I believe that they are both qualified to provide care for the community. That is what each of the hospitals should be proud of. They have given each of us a choice as to where they believe the best care for themselves. That is what each person is really concerned with. Reading the documents attached says that Regional has limited services. I have not heard of people being turned away. People need a choice. One hospital is not enough for the size of Terre haute. Surrounding counties send patients from their facilities to both. Being that there are many places that the hospital is so small. The southern parts of vigo and the surrounding counties will suffer. Might not make it to the farther northern hospital
Eric	Concerned citizen	I oppose it. They want a monopoly
anonymou s	Private	I work at Union and realize that commenting is career limiting. The majority of my co-workers are against the proposed acquisition of Regional Hospital. The consensus is we are unable to take care of what we have now. Which is very true. If Union Health and the IDOH have been working on this merger for years, as Steve Holman stated in a press release this evening, it sounds as if thereâ€™s more politics involved than the best interests of the community. Steve Holman and the rest of the admin team NEVER set foot outside of their offices. Itâ€™s been years since he has been seen except on television. Their staff governance is ineffective and they hide sentinel events. Please do not give them control of more than they have already.
Micheal Desue	Union hospital	I hope they stop there merger one hospital n terrehaute not patient care will suffer like it already is a Union Hospital over worked employees
LINDA BONAR	n/a	Union hospital should not be able to take over Regional Hospital they can not take care of what they have now. I came to the emergency room this spring two times the time il came in an ambulance thew 3rd time and they kept me i was having a stroke!!! My othopedic surgeon had to call and have them give me an MRI to find the stroke. Now I am having effects from the medicine the hospital DR. put me on.

Concerned Community Member	Concerned Community Member	<p>To the Indiana Department of Health, I'm an occupational therapist in the community of Terre Haute, IN. I have concerns about the detrimental plan that is set to be implemented if Union Hospital is allowed to purchase Terre Haute Regional Hospital and how it will affect patients requiring emergency care. This community is filled with railroad tracks and trains that frequently stop, making it difficult to impossible to cross town at times. When we have only one Emergency Department in town the precious minutes to save a patients brain function or lives may be wasted because of something as simple as poor planning on the part of one hospital. The fact that this is the initial plan concerns me that those in charge not only don't know what is best for this community, but don't care. The Federal Trade Commission has already made their recommendation that this monopoly on healthcare will have many negative implications with no guarantee that the positive implications, if any, will outweigh them. This is a group that has done the research on the effect this kind of merger has on a community, please trust their judgement. I beg you to consider that there are other hospital systems that could be willing to purchase Terre Haute Regional Hospital, which would keep the competition of healthcare in our community alive and allow both Emergency Departments to remain open. Please consider the individuals in our community and what you would choose if you were making this decision for your family and your community. I love my community and have chosen a profession where I show up for the sake of my patients everyday, to fight for what is best for them. I ask you to do the same.</p>
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Anonymous	Doesn't matter	<p>I do not feel this is in the best interest for the community. It isn't giving anyone a local Choi as to where they want to go. The older generation in the south part of town may have difficulty getting to Union. If Regional stays as is, they have a better chance.</p>
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Ashley Richey	Personal	<p>This merger would set Vigo county back in healthcare advancement. We citizens need choices that are local and accessible. Both local hospitals already have issues with adequate staffing to provide safe patient care and I do not see this issue resolving if they merge. No patient should ever have to sit and be treated in a hallway bed for 23+ hours in an ER due to staffing issues and this is a common practice at the acquiring hospital. Please do not take away healthcare options from our community. With this merger we will have an increase of community members who put off getting the basic care they need due to lack of options. Thus increasing likelihood of increased mortality rates when patients put off care until they are critical. We need to keep options that allow are patients accessible, affordable, and supportive preventative care options!</p>
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Dave West Individual

I oppose the merger. In the past Union has always had a self pay system where people who don't qualify for assistance but can't afford the bill could pay monthly payments. These payments could be \$20, \$25, \$50 for example depending on what you could afford. By doing these payments it saved your credit and no collections. However, now they have changed this since talking about the merger. There is no self pay like before. They will accept payments without sending you to collection but now they use a formula based on amount of bill. For example my bill was \$3200 and I was told I had to pay a minimum of \$125 a month or it goes to collection. I explained I couldn't afford that and could do at best \$50 month. I was told they would take the payment but still send me to collection because it wasn't \$125. When I asked why they are different and told them this could send people into bankruptcy, I was told that the board voted and decided this was in their best interest moving forward starting Jan 1 2024. They are a non profit but now changing things to be less willing to work with those who can't afford. Seems awful convenient that when merger talks start they make changes demanding higher payments. I mean if they won't work with people and demand more than someone can afford and send them to collection that could and will ruin some lives. I am at a point that when they send mine to collection then it will destroy my credit score. When my credit is destroyed then I have nothing left to lose and being backed into corner will file bankruptcy and they won't get a penny when they could have gotten monthly payments I could afford. Also for clarity I am already on an old payment plan with them paying \$50 so this new demand of \$125 would make me paying them \$175 a month. This just doesn't seem right, your non profit and here to help people or your not. People should pay for their services but realistic payments also. Union already controls most of Terre haute with many doctor offices now being part of union group. They shouldn't be allowed to control both hospitals also.

Dave Individual

Put it on a ballot and let the community vote and decide like it did for the casino. Union says they can do better together, they site obesity and different health metrics comparing us with the entire state. If you look at metrics then Union and Regional both are performing sub par so! Since when does 2 wrongs make a right? Union has been monopolizing Terre Haute for awhile by taking over clinics and doctors offices. Please stop this from happening or let the community vote

Lee smith Union
 Hospital

As a citizen of Terre Haute for nearly the last decade, I can say that I have seen this hospital system become more and more of a monopolizing bully in terms of being a healthcare provider and an employer. The quality of care at this facility has done nothing but drop over the years and I have yet to see a doctor (physician-MD/DO) be recruited and retained due to the toxic nature of this hospital as a workplace. Allowing them to be the only hospital employer would drive down the administration's motivation to promote a positive, outcome driven, physician friendly environment that then goes on to provide excellent healthcare to the community. Currently I avoid this system for my healthcare because of the above issues (poor quality of care and near complete dismissive attitude of administration to improve because they know they have the upper hand as a near monopoly here). members of the community who dislike the idea of Union Hospital as the sole hospital for vigo county are quickly silenced. No one feels empowered to outwardly speak against Union Hospital as they carry (and use) so much power in the community but many agree that a complete merger is not a good idea. Competition drives improved quality of care; there is not a scenario in my mind where a healthcare monopoly would drive said corporation to IMPROVE their service and drive down their cost to the community.

Kathi Johns N/A

As a registered radiologic technologist who lives in TH and has worked at both Union and THRH, I opposed this merger solely based on my experiences as a healthcare worker. I do not believe that Union health has the best interest of the Wabash valley residents in mind with this merger. Despite their wordy claims of the benefits, it's a business deal at the end of the day. I resigned my position at Union health after a new CEO took over and slashed workers in all parts of the hospital, to the point that it endangered both patients and workers with not enough staff to safely care for them and perform radiologic exams. I spoke up about my concerns to management only to be told that "this is the way it is now, deal with it". They cut 16 positions just in radiology back then. I have a strong feeling things like that will happen at THRH and it will once again endanger patients and staff. In comparison, I left THRH because of staffing issues, but also because I am older and have a few health issues myself that would not allow me to work in that fast paced work environment. I work in outpatient now and it's a better fit for me. THRH had its challenges after COVID, but I believe that this merger is not the solution for the Wabash valley. Patients should have a choice, not be forced to go to the only option available. The patients they claim to want to help are also ones that lack the money and transportation to go elsewhere if they do not want to go to Union. This merger will remove the one option they currently have, choice. Thank you for considering my comments.

Thomas Clouty	State of Indiana	The merger of Union Hospital and Regional Hospital in Vigo county has yet to be shown as beneficial to members of the community. But there are several reasons to believe the merger would be detrimental. What guarantees have been given to assure the immunity from antitrust issues wouldnt be abused? No specifics have been put into writing and this is concerning as a member of the community.
Jack wade	None	I am concerned about all cancer treatment options being absorbed by the main Union hospital. I already drive 45 minutes to see my oncologist. If it is moved to the north side, that increases the time it takes to get there considerably. Being a cancer patient, it is already hard enough to make the trip.
John B Kniesly	Individual	The objections from the FTC are "canned", and are being used to usurp and influence local/state decision making.
Christina Sprouls	Accessgov.com	I am against the merge of Union and Reginal Hospital in Terre Haute Indiana
Jessica Fox		Hello I am a resident of Terre Haute Indiana where both of our hospitals are working towards a merger. I just wanted to state as a citizen of the city I am not for the hospitals combining. If Union hospital is granted to purchase Regional they will become a monopoly in our area. It will also cause our large town to only have ONE emergency room and ONE ICU unit both of which are often already incredibly full at both locations. There is also documentation of when hospitals have merged together in this way in the past they have signi cantly reduced patient care. Please say NO to Union Hospital and Regional Hospital merging!

Zack Cooper Yale
University

Union Hospital, Inc. (Union Health) is proposing to acquire Terre Haute Regional Hospital, L.P. (Terre Haute Regional Hospital). In their application for a Certificate of Public Advantage (COPA), Union Health and Terre Haute Regional Hospital have argued that this transaction would improve local health, raise efficiency, and increase quality without raising costs for consumers or harming access to care. This transaction involves two hospitals located approximately five miles apart. The next nearest hospital is located approximately 20 miles away. This public comment draws on the extensive evidence of how transactions of this type and similar COPAs have impacted hospital prices, hospital quality, access to care, and the health of local populations. The comment also draws on my recent work assessing how transactions like the proposed Terre Haute Regional Hospital and Union Health merger impact hospital prices, health care spending, insurance premiums, local wages, and employment (Brot-Goldberg et al., 2024; Brot-Goldberg et al., forthcoming). In this comment, I will also describe how evidence from past mergers and other states' experiences with COPAs can inform the Indiana Department of Health's assessment of how the outcomes from this proposed merger relate to the standards for issuing a COPA outlined in Indiana Code Â§ 16-21-15. Context: I am health economist who studies hospital competition and the functioning of health care markets. I am an Associate Professor of Health Policy and Associate Professor of Economics at Yale University. I have written a number of academic articles assessing the impact of hospital competition on clinical quality and provider prices and have also studied the impact of hospital mergers on hospital prices, health spending, and economic growth in local communities (Cooper et al., 2011, Cooper et al., 2019, Cooper et al., 2022, Brot-Goldberg et al., 2024, and Brot-Goldberg et al., forthcoming). I have presented my work on hospital competition and mergers at the U.S. Department of Justice (DOJ), the Federal Trade Commission (FTC), and White House, as well as in numerous states. I have testified about hospital competition and mergers before the U.S. Senate. Overview: Based on my nearly 20-years of studying hospital competition and hospital mergers, I firmly believe this merger would harm members of the public in Terre Haute and Vigo County. This transaction will meaningfully lessen competition and would create a new merged entity that will have a local market share, depending on how it is measured, that ranges from approximately 75% to approximately 100%. Across a range of approaches for measuring the changes in market concentration that this transaction would, this merger would run afoul of the Department of Justice and Federal Trade Commission 2023 Merger Guidelines. Based on my analysis of hundreds of mergers and evidence from past COPAs, this transaction is unlikely to improve the quality of care patients receive, is unlikely to meaningfully impact public health, will raise health care spending locally, will lower local access to care, and will lead to overall reductions in local income and employment in the area. The academic literature on hospital mergers that were granted COPAs also highlights that the quality of care at the merging facilities tended to fall (Garmon and Bhatt, 2022). Based on what the academic evidence suggests about the likely impact of the Terre Haute Regional Hospital and Union Health merger, my assessment is that the transaction would not achieve the goals described by the applicants and would generate more local costs than benefits. That is, the merger would not meet the approval standards outlined in Indiana Code Â§ 16-21-15. My analysis of the merging parties' application and the relevant protections included Indiana Code Â§ 16-21-15 also lead me to believe that the protections afforded to consumers via a COPA would not obviate the substantial harms this transaction is likely to induce for consumers. My estimates are that this merger, even if a COPA were granted, would raise commercial prices by between 10% and 30%, raise local insurance premiums by 3% to 10%, lower wages in the area across health care and non-health care workers by 1%, cause approximately 500 job losses outside the health sector, and precipitate one to two excess deaths in the community from suicide or overdose. These suicides and overdoses stem

from the job losses among workers outside of the health care sector that this transaction would generate. The collective economic harm from this transaction over a two-year period would be approximately \$50 million, and the harms would continue to accumulate beyond this two-year timeframe. These harms do not include the reduction in local tax revenue that would result from this merger that stems from the fact that it transitions one of the merging parties from a for-profit entity (who therefore pays property taxes) to a non-profit entity that will have significant tax concessions. Because this transaction would raise prices and, in turn, out-of-pocket costs for consumers, it would also meaningfully harm access to care for residents of Vigo County.

Standards for Assessment: Indiana Code Â§ 16-21-15 states that COPAs shall be granted if: (1) A hospital merger may benefit the public by maintaining or improving the quality, efficiency, and accessibility of health care services offered to the public. (2) Benefits resulting from a hospital merger may outweigh any anticompetitive effects of joining together competitors, including addressing unique challenges in providing health care services in rural areas. (3) It is in the state's best interest to supplant state and federal antitrust law with a process for regulatory approval and active supervision by the state department, as provided in this chapter. (I.C. Â§ 16-21-15-0.5).

Statement of Merging Parties on Competition: The applicants state on page 58 of their COPA application that, "the Transaction will enhance competition" and that "this proposed Merger will result in higher quality and improved access to health care without any undue increase in health care costs because it will not result in a meaningful reduction in competition for inpatient and outpatient services in the region." On page 58, the merging parties underscore the value of competition when they write, "competition is valuable because it can benefit consumers. The principal objective of antitrust policy is to maximize consumer welfare by encouraging firms to behave competitively." If the merger is consummated, the net effect will be to promote, not lessen, the traditional benefits of competition in UHI and THR's geographic service areas.

Impact on Competition: It is unclear how the merging parties arrived at the conclusion that this merger would promote competition. Their assertion is inconsistent with standard economic theory. Unlike what the parties assert, my assessment is that this transaction would substantially lessen competition in the hospital market in Terre Haute, Indiana, and Vigo County. The dominant measure of market concentration used by the DOJ and the FTC is the Herfindahl-Hirschman Index (HHI) (Department of Justice and Federal Trade Commission, 2023). HHIs range from 0, indicating a perfectly competitive market, to 10,000, which reflects a monopoly market. According to their recently updated 2023 Merger Guidelines, the DOJ and the FTC define a market as highly concentrated if it has a HHI greater than 1,800. As the DOJ and FTC also note, "a merger that creates or further consolidates a highly concentrated market that involves an increase in the HHI of more than 100 points is presumed to substantially lessen competition or tend to create a monopoly" (Department of Justice and Federal Trade Commission, 2023). Moreover, the agencies note that "a merger that creates a firm with a share over thirty percent is also presumed to substantially lessen competition or tend to create a monopoly if it also involves an increase in HHI of more than 100 points" (Department of Justice and Federal Trade Commission, 2023). There are multiple approaches to defining the market for hospital care in Vigo County. Irrespective of the strategy used to assess market concentration, this merger would run afoul of the standard merger screening. Using a standard market definition based on a twenty-mile radius drawn around hospitals, the merger of Terre Haute Regional Hospital and Union Health would raise the local HHI in Vigo County from approximately 5,000 to approximately 10,000. In other words, the merger would shift the local market from a duopoly to a monopoly and create one firm with nearly 100% of the market. According to the DOJ and FTC Merger Guidelines, this type of transaction would likely raise prices and adversely impact quality due to a lessening of competition (Department of Justice and Federal Trade Commission, 2023). Using a wider market definition based on local patient flows, this merger would raise the local HHI from approximately 3,500 to approximately 5,500 and create a combined entity with a market share of approximately 75%. This latter approach also implies that the

transaction would meaningfully lessen competition. Health Care Quality: On page 61 of their application, the applicants state, “Furthermore, with regard to the provision of quality health care services particularly, it is well established that there is a materially positive correlation between hospital volumes and better outcomes across a wide range of procedures and conditions. The patient volumes at Post-Merger [sic] Union Hospital will be greater than the pre-Merger patient volumes at Regional Hospital, or the pre-merger patient volumes at Union Hospital. Consistent with the findings of various studies, this increased volume will operate to improve the quality of care provided by Post-Merger [sic] Union Hospital.” Contrary to what the merging parties suggest, the best available evidence suggests that hospital mergers involving COPAs have led to reductions in quality (Garmon and Bhatt, 2011). The merging parties also misinterpret the implications of the evidence on the relationship between provider volume and quality. The applicants accurately note that the academic literature has found a positive correlation between hospital volume and hospital quality. However, this does not mean that a merger that raises hospital volume will causally lead to higher quality. Instead, the academic literature suggests that mergers largely do not impact clinical quality (Mariani et al., 2022). While there are returns to being large, the literature suggests that this correlation is explained by the fact that better hospitals tend to grow more over time (Chandra et al., 2016). Contrary to what the merging parties assert, there is scant evidence that mergers raise clinical quality and, if anything, reviews of the literature indicate that the relationship between mergers and quality is modestly negative (Handel and Ho, 2021). Within the literature, for example, Beaulieu et al. (2020), published in the New England Journal of Medicine, examined 246 acquired hospitals between 2009 and 2013 and concluded that “hospital acquisition by another hospital or hospital system was associated with modestly worse patient experiences and no significant changes in readmission or mortality rates.” Moreover, there is a clear negative relationship between competition and mortality --- that is, hospitals facing less competition tend to have higher death rates. Kessler and McClellan (2000), Cooper et al. (2011), Gaynor, Moreno-Serra and Propper (2013), and Gaynor, Propper and Seiller (2016) all study the relationship between competition and quality and conclude that hospitals facing more competition have higher quality and lower death rates. Garmon and Bhatt (2022) examined the impact of hospital mergers subject to COPAs prior to 2015 on clinical quality. They show that the change in market power from these mergers led to reductions in hospital quality. For example, following the Southern Maine Medical Center and MaineHealth merger, mortality rates for heart attack, heart failure, and pneumonia increased. The authors concluded that their general finding “is that COPA-regulated hospitals may experience reductions in quality.” In their discussion of a second merger with a COPA, they also state that, “after Phoebe Putney’s acquisition of Palmyra Medical Center, quality declined across most measures.” Health Improvement Initiatives: Union Health and Terre Haute Regional Hospital’s COPA application notes that they will introduce a number of community health programs. In their application, Union Health and Terre Haute Regional Hospital state that Union Health “has implemented, and plans to implement, a number of innovative health care initiatives that are not typically associated with routine clinical care, but which nonetheless improve the health status of, and access to quality care by, patients and the public at large” (page 20). These sorts of claims are often found in COPA applications (Garmon and Bhatt, 2022). However, once the parties merge, the reduction in competition generated by the transaction will eliminate the economic incentives for the merging parties to follow through on their commitments. It is therefore important to note, as the merging parties note on pages 25, 26, 27, and 28 of their COPA application, the majority of their public health and community initiatives have not yet been implemented and will only commence after the transaction is completed. Past experiences with COPAs in other jurisdictions should inform the state’s assessment of the likelihood that Union Health and Terre Haute Regional Health’s merger will lead to public benefit. In 2018, Mountain States Health Alliance and Wellmont Health System merged to form Ballard Health System. Their COPA application included pledges to invest in public health programs (Mountain States Health Alliance and Wellmont

Health System, 2016). Five years after the merger was completed, Kaiser Health News published an article titled, “These Appalachia Hospitals Made Big Promises to Gain a Monopoly. They’re Failing to Deliver,” in which they outline how Ballad, the newly merged entity, failed to fulfil their pledged charity care obligations, did not meet the majority of their quality benchmarks, and engaged in aggressive debt collection (Kelman and Liss, 2023).

Efficiency: The applicants note on page 4 that “combining the management and back-office operations at a single location will maximize the coordination and efficiency of management and other administrative services, including communications across the Combined Clinical Platform.” Once consolidation is completed, shared services expense is expected to be reduced by \$2 million annually. On page 43, the applicants state that “the Merger will produce reductions in health care costs over time, and these savings will largely result from improvements in care coordination and reductions in redundant back-office operations. The merging parties’ assertions about efficiencies are inconsistent with the academic evidence. For example, Schmitt (2017) examined the impact of hospital mergers between 2000 and 2010 on cost savings. Schmitt found evidence of cost reductions. However, these reductions were only present in transactions where the merging parties were not located nearby and hence were not competitors. Their findings echo earlier work by Dranove and Lindrooth (2003). Given the change in market structure that the merger of Union Health and Terre Haute Regional Hospital will generate, this transaction is unlikely to generate sufficient competitive pressure to incentivize the merging parties to materially reduce costs.

Health Care Prices: There is an extensive body of evidence, summarized in Handel and Ho (2021), that shows that hospital mergers involving parties that are geographically proximate generally raise prices. In my work, for example, we find that mergers involving close competitors generally lead to price increases of 5% or more (Cooper et al., 2019). Likewise, Brot-Goldberg (forthcoming) highlight how hospital mergers that raise the HHI of merging parties by more than 200 points and result in a post-merger HHI of over 2,500 points lead to price increases of, on average, more than 5%. The Union Health and Terre Haute Regional Hospital merger would raise the local HHI by approximately 5,000 points. My conservative estimate is that this transaction would raise local prices by 10% to 30%.

Critically, I.C. Â§ 16-21-15 does include limits on growth of providers’ charges. However, the vast majority of the contracts hospitals negotiate with insurers are wholly unrelated to providers’ charges (Cooper et al., 2019). As a result, it is highly likely that, even with a COPA in place, the newly merged Union Health and Terre Haute Regional Hospital entity will substantially increase their negotiated prices. To that end, as the applicants state on page 65, “as a threshold matter, it is important to note that, if the COPA is granted, Post-Merger Union Hospital will be prohibited, pursuant to I.C. Â§ 16-21-15-7(c), from increasing the charges for individual services by more than the increase in the preceding year’s annual average of the Consumer Price Index for Medical Care, as published by the federal Bureau of Labor Statistics.” This prohibition limits the Hospital’s charges, and consequently, limits the Hospital’s ability to use its charges as a basis for negotiating higher reimbursement rates with payors. Here, it is vital to note that, in their application, the merging parties do not assert that the COPA will limit the growth of the prices they negotiate with payers or the prices of any of their value-based or alternative. Instead, they state that it will limit their ability to use charges as a basis for negotiating higher reimbursements. As a result, the protections included in I.C. Â§ 16-21-15-7 are unlikely to thwart supernormal growth of the actual transaction prices that the merging parties negotiate after the transaction is completed.

Access: Because the Terre Haute Regional Hospital and Union Health merger is likely to markedly increase the combined entity’s negotiated prices, the transaction will also lead to an increase in patient cost-sharing. There is clear evidence that when cost-sharing increases, individuals reduce their use of health care services. As a result, it is likely that the proposed merger will reduce access to hospital care for residents of Terre Haute and Vigo Country (Brot-Goldberg et al., 2017).

Impact on Workers: On page 40 of their application, the applicants state that “the Merger is not expected to result in material cost

reductions attributable to employee departures. However, when hospitals gain market power, they also gain the ability to negotiate lower wages with workers. Prager and Schmitt (2021) show that, following a merger where the merging parties gain market power, nurses' salaries drop by approximately 7%. This is an average estimate across mergers, and, given the substantial increase in market concentration that the merger in Terre Haute is likely to generate, it is likely that the Terre Haute transaction could lead to wage reductions for nurses of 10% or more.

Impact on the Local Community:

The majority of working-age adults in the U.S. get their health insurance from an employer. When the price of hospital care goes up, it raises insurance premiums. In the presence of employer-sponsored health insurance, this increase makes it more costly for non-health care firms to retain workers. Brot-Goldberg et al. (2024) --- work where I am a coauthor --- studies the impact of rising hospital prices caused by hospital mergers on local wages and employment. Our work shows that when hospital prices go up, local firms reduce the count of workers they employ and local incomes go down. Moreover, the research highlights that it is middle-income workers who are most likely to become unemployed. Our results suggest that, when applied directly to this transaction, if the merger between Terre Haute Regional Hospital and Union Health led to a 10% increase in hospital prices, it would decrease local wages in Vigo County by approximately \$36 million and lead to a net reduction in 300 to 800 local job losses. These job losses would be concentrated among middle class workers employed in jobs outside the health care sector. A growing literature highlights how losing a job and becoming wholly separated from the labor market can have devastating health consequences and increase short-run mortality (Eliason and Storrie, 2009; Sullivan and von Wachter, 2009; Pierce and Schott, 2020; Venkataramani et al., 2020). The rise in mortality following job losses generally stems from a surge in overdoses, vehicular accidents, and self-harm (Eliason and Storrie, 2009 and Venkataramani et al., 2020). Consistent with this literature, Brot-Goldberg et al. (2024) find that, following price increases from hospital mergers, approximately 1 in 140 of the individuals who lose a job and become separated from the labor market die within a year from a suicide or an overdose. I estimate, based on that work, that the merger between Terre Haute Regional Hospital and Union Health would lead to one to two excess deaths from suicide or overdose.

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