



Brian Smith
Head of Government Relations
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Public Affairs
MAC R0151-082
1700 K ST NW
8th Floor
Washington, DC 20006

January 23, 2023

The Honorable Elizabeth Warren
309 Hart Senate Office Building
Washington, DC 20510

Dear Senator Warren,

I am writing in response to your December 29, 2022 letter to Wells Fargo & Company (Wells Fargo) regarding medical credit cards. Wells Fargo recognizes that managing health care expenses poses challenges for many consumers.

To help address some of those challenges, Wells Fargo offers the Wells Fargo Health Advantage Card (WFHA). This card provides financing options for dental, vision, audiology, and veterinarian expenses, and is accepted by a network of about 1200 providers. This card represents a small part of our overall credit card business, comprising less than \$200 million annual volume, and less than 65,000 active cardholder accounts. More specifics are available on WFHA and participating providers on Wells Fargo's website.¹

Given the segments WFHA serves, the procedures and products financed are generally elective, performed in-clinic, and not eligible for subsidized or charitable coverage. The provider network does not include medical hospitals, out-patient surgical centers, or urgent care centers. Providers are prohibited from increasing the price of a procedure or product financed using WFHA and agree not to finance under the WFHA program any procedure or product covered by a customer's insurance or by a governmental or subsidized medical plan that is more financially favorable to the consumer.

Rates and terms of the card, including any promotional offers, are fully disclosed upfront. Interest rates range from 0-12.99%. As of the end of November 2022, the average interest rate was less than 5.25%, and the average balance was just under \$3,000. The average interest rate over the past two years was less than 6.5%. Rates and fees do not vary by specialty.

The average payoff period is 15 months, and most cardholders pay off their balances without paying any interest. There were just under 41,000 accounts with a deferred interest promotion expiring in 2022, with just over 80% of those customers paying off the full amount in the promotion period, ultimately paying no interest. Those who do not pay-off within the promotion period are subject to a maximum 12.99% rate. As of the

¹ <https://retailservices.wellsfargo.com/locator/WFHA>

end of December 2022, the delinquency rate for this card was about 1% higher than our overall private label credit card delinquency rate of [REDACTED].

As with other credit cards, providers agree to pay Wells Fargo a percentage of the amount financed to participate in the program (fee). Our standard agreement with a provider does not contain financial incentives, although a handful of providers pay a reduced fee based on volume. Any reduced fee would not result in a provider receiving more than the cost of the procedure. No payments of any kind are offered to promote the WFHA program to consumers. We may offer a few manufacturers or professional member groups funds to promote the WFHA product directly to providers. Within each of these groups, we have a direct standard agreement with each provider. No paid endorsements are offered to hospitals or health associations.

Wells Fargo actively engages with providers and offers ongoing support to both providers and consumers. We require providers to take regular training. Our training covers the program overview, application, and fair lending. The training is conducted live—typically via webinar—and the provider is then required to complete a knowledge check and certification annually. Wells Fargo also has a team to handle any issues or questions a provider or consumer may have with the card.

We look forward to discussing this topic with you in more detail.

Respectfully,

Brian Smith

Brian Smith
Head of Government Relations & Public Policy
Wells Fargo & Company

cc:

Senator Edward J. Markey
Senator Bernard Sanders
Senator Christopher S. Murphy
Senator Sherrod Brown

Total active accounts/enrolled WFHA providers by state

State	Total Active Accounts
AK	90
AL	755
AR	664
AZ	991
CA	5235
CO	681
CT	665
DC	15
DE	49
FC	1
FL	7689
GA	1576
HI	140
IA	624
ID	127
IL	2203
IN	1812
KS	939
KY	705
LA	1069
MA	406
MD	474
ME	169
MI	1555
MN	1076
MO	1954
MS	275
MT	152
NC	1419
ND	70
NE	288
NH	112
NJ	2333
NM	619
NV	285
NY	5349
OH	1737
OK	1247
OR	450

PA	2489
PR	4
RI	65
SC	764
SD	159
TN	1682
TX	8103
UT	367
VA	1352
VI	1
VT	22
WA	237
WI	780
WV	364
WY	37

State	# of Providers
AK	1
AL	11
AR	10
AZ	18
CA	121
CO	22
CT	13
DE	1
FL	146
GA	31
HI	4
IA	16
ID	2
IL	27
IN	19
KS	11
KY	10
LA	10
MA	15
MD	25
ME	2
MI	21

MN	19
MO	18
MS	8
MT	1
NC	42
ND	5
NE	11
NH	6
NM	6
NJ	38
NV	10
NY	99
OH	40
OK	13
OR	10
PA	67
RI	3
SC	22
SD	6
TN	14
TX	108
UT	10
VA	34
WA	13
WI	17
WV	4
WY	3



Alberto B. Casellas
EVP & CEO, Health & Wellness

Synchrony
555 Anton Blvd. 7th Floor
Costa Mesa, CA 92626

January 26, 2023

The Honorable Elizabeth Warren
309 Hart Senate Office Building
Washington, DC 20510

The Honorable Edward J. Markey
255 Dirksen Senate Office Building
Washington, DC 20510

The Honorable Bernard Sanders
332 Dirksen Senate Office Building
Washington, DC 20510

The Honorable Christopher Murphy
136 Hart Senate Office Building
Washington, DC 20510

The Honorable Sherrod Brown
503 Hart Senate Office Building
Washington, DC 20510

Dear Senators Warren, Markey, Sanders, Murphy, and Brown:

Thank you for your letter of December 29, 2022 regarding medical debt and the tools consumers use to manage their medical expenses. Your letter includes sixteen data requests, the responses to which are provided in an appendix to this letter. We share your desire to treat consumers fairly and transparently, and hope this response can help you better understand our commitment to doing so.

CareCredit has been offered to consumers for more than 35 years.¹ The CareCredit network allows consumers to use their CareCredit cards to pay for a variety of health, wellness, and veterinary products and services at over 260,000 locations across the country, including large retail chains, veterinary clinics, dental offices, and cosmetic practices.² We are pleased that so many consumers find value in CareCredit to make these types of payments; consumers overwhelmingly rate CareCredit highly, including a 90% satisfaction rate. Our research also indicates that CareCredit has a net promoter score of 76, far exceeding the consumer finance industry average of 42.

We understand from your letter that you are primarily concerned with issues associated with the cost of “necessary medical care” and how consumers manage those costs. It is important to underscore that, to the extent CareCredit is used for medical expenses, those expenses overwhelmingly relate to *elective* medical procedures not usually covered by insurance, such as cosmetic procedures, LASIK surgery, dentistry, or veterinary services. While CareCredit has recently been exploring how to serve cardholders when they make payments to hospitals and health systems, payments to such entities (which can involve payment for a variety of elective and non-elective procedures) represent a very small fraction of CareCredit’s transaction volume

¹ CareCredit is a brand within Synchrony’s Health and Wellness platform.

² The majority of CareCredit credit cards have utility solely within the CareCredit network which has over 260,000 acceptance locations. Some CareCredit cards are also enabled on the Mastercard network, and can be used anywhere Mastercard is accepted.

and a virtually unmeasurably small amount of transactions at hospitals and health systems across the country.³

We take great care to offer CareCredit responsibly. CareCredit credit cards are underwritten in a safe and sound manner consistent with regulatory requirements and expectations. Applicants must demonstrate that they are creditworthy and satisfy federally mandated “ability to pay” requirements in order to receive a CareCredit credit card. CareCredit denies applications from consumers who appear unlikely to manage a CareCredit credit card responsibly. There is every interest in making sure that an applicant has the ability to repay a credit card loan—not only is that the regulatory expectation, but the credit card issuer suffers the loss when a cardholder ultimately cannot repay the balance. We have no interest in providing credit to someone who cannot repay a loan.

CareCredit’s objective across its entire network, including hospitals, is to be a payment option that is convenient and beneficial for consumers to choose, the same as how consumers may choose to pay with a check, Mastercard, Visa, American Express, or Discover. Payment card brands—including CareCredit—do not have a role in the process a hospital uses to bill for care. While CareCredit prohibits health systems from offering CareCredit as a payment option to individuals while they are in the emergency room or under duress, it is up to the hospital to determine how best to bill for care, and how much to bill for care, in compliance with all applicable laws and insurance requirements. We do not provide any incentives to any provider, including hospitals, associated with consumers’ use of CareCredit cards.⁴

In closing, we strive to ensure CareCredit is a fair and transparent option to pay anyone who accepts CareCredit.

Sincerely,

A handwritten signature in black ink, appearing to read "Alberto B. Casellas", written over a horizontal line.

Alberto B. Casellas
Executive Vice President and CEO, Health & Wellness
Synchrony Financial

Attachment (Responses to Questions from Letter of December 29, 2022)

³ For example, CareCredit has relationships with over 300 hospitals which comprise less than 1% of CareCredit’s 260,000 acceptance locations. For the period from January 1, 2022 to September 30, 2022, such hospitals comprised less than 1% of CareCredit’s purchase volume.

⁴ CareCredit may offer a merchant (including a hospital) prospective pricing based on historic payment volumes.

Appendix

Responses to Questions posed to Synchrony on December 29, 2022

The responses below include cardholder information for all CareCredit credit cards. The majority of these cards have utility solely within the CareCredit network of over 260,000 locations across the country, including large retail chains, veterinary clinics, dental offices, and cosmetic practices. Some CareCredit cards also have utility on the Mastercard network, and can be used anywhere Mastercard is accepted. Neither of these types of CareCredit credit cards would be a “medical credit card” as the term was defined in the letter. To be responsive, the questions below have been modified such that they pertain to CareCredit cards.

1. How many active [CareCredit] credit card accounts and card holders do you have? Please provide a state-by-state breakdown.

As of September 30, 2022, there were 6.3 million active CareCredit accounts. Active accounts represent credit card accounts on which there was a purchase, payment or outstanding balance in the month ended September 30, 2022.

Schedule 1 attached hereto provides the state-by-state breakdown of our active accounts as of September 30, 2022.

2. What is the average balance on the [CareCredit] credit card?

The average balance per active account as of September 30, 2022 was \$1,779.

3. What is the average interest rate for card holders? What is the maximum interest rate?

The majority of purchases made with a CareCredit card are subject to promotional terms, such as deferred interest or reduced rate promotions. The impact of these types of transactions results in an effective interest rate (finance charges divided by outstanding balances, annualized) of 16.74% for the month ended September 30, 2022. The average interest rate for purchases that are not subject to a promotional interest rate for the month ended September 30, 2022 was 26.44%.

The maximum rate of interest for 99.9% of accounts is 26.99%. For the remainder, it can be up to 29.99%.

4. What was the average rate as of January 1, 2022?

The majority of purchases made with a CareCredit card are subject to promotional terms, such as deferred interest or reduced rate promotions. The impact of these types of transactions results in an effective interest rate (finance charges divided by outstanding balances, annualized) of 15.75% for the month ended December 31, 2021. The average interest rate for purchases that are not subject to a promotional interest rate for the month ended December 31, 2021 was 26.44%.

5. What was the average rate as of January 1, 2021?

The majority of purchases made with a CareCredit card are subject to promotional terms, such as deferred interest or reduced rate promotions. The impact of these types of transactions results in an effective interest rate (finance charges divided by outstanding balances, annualized) of 16.95% for the month ended December 31, 2020. The average interest rate for purchases that are not subject to a promotional interest rate for the month ended December 31, 2020 was 26.40%.

Combined Questions 6 and 10

6. How long does the average [CareCredit] card holder take to pay off the balance? How many accounts are in collections?

10. How many [CareCredit] card holders enter delinquency? What is the delinquency rate for all other credit cards?

The CareCredit card is an open-end credit product, meaning that the card can be used to make multiple and repeated transactions generally as long as the account has not exceeded its assigned credit limit. Given the open-end nature of the CareCredit card, CareCredit does not calculate how long an average cardholder takes to pay a balance to zero.

Synchrony (of which CareCredit is a brand) does not publicly disclose delinquency rates by brand or portfolio. As of September 30, 2022, 3.28% of outstanding balances on Synchrony credit cards was 30 or more days past due.

7. What percentage of the time do patients end up paying list or “chargemaster” prices for services when they are charged to [CareCredit] cards?

CareCredit, as a payment card issuer and a payment card network, does not have access to this type of information.

8. How many [CareCredit] card accounts have had a balance subject to a deferred interest promotion? How many of those accounts ended up being charged deferred interest?

There were approximately 7.6 million transactions receiving a deferred interest promotion on CareCredit cards from January 1, 2022 to September 30, 2022. Of the transactions that were subject to a deferred interest promotion expiring between January 1, 2022 and September 30, 2022, approximately 77% were repaid during the promotional period, and therefore were interest-free loans. Approximately 23% of such transactions were not repaid within the promotional period, and were therefore assessed interest.

9. What’s the breakdown of interest and fees on [CareCredit] card loans by specialty?

Dental providers accounted for 56% of the Health & Wellness platform’s interest and fees on loans for the year ended December 31, 2021. The next largest specialty is veterinary practices. The interest and fees for which hospitals account is consistent with the fact that less than 1% of CareCredit’s purchase volume is generated by hospitals.

11. How many hospitals and providers do you partner with?

The CareCredit card allows consumers to use their cards to pay for a variety of health, wellness, and veterinary products and services at over 260,000 locations across the country, including large retail chains, veterinary clinics, dental offices, and cosmetic practices. To the extent CareCredit is used for medical expenses, those expenses overwhelmingly relate to *elective* medical procedures not usually covered by insurance, such as cosmetic procedures, LASIK surgery, dentistry, or veterinary services. Among the types of providers included in the CareCredit network are over 300 which CareCredit classifies as hospitals and which generated less than 1% of CareCredit's purchase volume from January 1, 2022 to September 30, 2022.

Combined Questions 12 and 14

12. What is the nature of your paid endorsement arrangements with hospitals, providers, and any other health care partners? Are consumers who sign up for [CareCredit] cards informed of the exact nature of these paid endorsements?

14. Please list any and all partnered health associations and groups. How many of them and which are paid endorsements? Please include the terms and conditions of all paid endorsements with these associations and groups in exchange for using [CareCredit] credit cards.

CareCredit does not have any paid endorsement arrangements with any of its providers, including hospitals.

CareCredit does, however, have over 150 relationships with professional and other associations (including the American Dental Association and the American Veterinary Medical Association), manufacturers, and buying groups, which endorse and promote our credit products to their professional members or practices. These associations do not promote CareCredit to consumers. Contracts with these associations are confidential, but may contain sponsorship payments and/or royalty payments.

13. Please list all partnered hospitals and providers and where they are located. Please include the terms and conditions of the arrangements with these hospitals and providers in exchange for [accepting CareCredit], including financial terms such as paid endorsements and whether you or the provider receive a referral fee.

There are over 260,000 acceptance locations in the CareCredit network. CareCredit's acceptance locations can be accessed through the CareCredit web site.

CareCredit's agreements with providers are confidential. However, the agreements do not include provisions for paid endorsements, nor do they have provisions for referral fees.

15. What training do you offer providers and their staff to ensure the terms of [CareCredit cards] are clear to patients, if any?

CareCredit requires that each enrolled provider, including staff members who interact with CareCredit customers, complete a certification training course about the CareCredit program

prior to participating in the CareCredit program and refresh the training every two years. If a provider's certification training is not refreshed in time, it is CareCredit's practice to suspend such provider's ability to facilitate customer applications for new accounts until recertification is completed. Each provider contract also contains "Transparency Principles" that not only require each provider to complete certification training, but also require that all consumer-facing employees and all promotional materials inform CareCredit customers about the different special financing options available to them and how those promotions work before choosing which option to use for their specific purchase.

CareCredit certification training is a multi-module curriculum consisting of multimedia presentations that demonstrate process flows, provide in-depth descriptions of the CareCredit credit card and standard account terms, and describe how promotional financing works and how to explain that to a consumer.

16. Are there any contract terms addressing the needs of patients who paid for services with a [CareCredit] card, but are in fact eligible for reduced cost or free care under a hospital's financial assistance with obligations?

CareCredit's multi-year agreements with large health systems specifically state that the CareCredit program is designed to operate alongside (and not part of or in lieu of) such system's existing assistance programs.

Schedule 1

<u>State</u>	<u>CareCredit Active Accounts (in 000's)</u>
California	724
Texas	688
Florida	626
New York	295
Georgia	239
North Carolina	239
Ohio	222
Illinois	212
Pennsylvania	205
Michigan	188
New Jersey	154
Arizona	151
Virginia	147
Tennessee	142
Indiana	135
Washington	115
Missouri	113
Colorado	111
South Carolina	105
Maryland	99
Massachusetts	93
Louisiana	92
Alabama	82
Wisconsin	82
Oklahoma	79
Oregon	76
Kentucky	75
Minnesota	69
Nevada	67
Connecticut	65
Arkansas	59
Mississippi	58
Kansas	44
Utah	41
Iowa	41
New Mexico	37
Idaho	35
New Hampshire	35
West Virginia	34
Nebraska	30

Maine	30
Delaware	18
Montana	17
Rhode Island	17
Puerto Rico	14
South Dakota	13
North Dakota	12
Vermont	11
Hawaii	11
Wyoming	10
Alaska	8
District of Columbia	5
Virgin Islands	1
Total	6,268

Question 1: Please detail your process for suspending a provider. How many providers have you suspended and why? Do you review card holders from suspended providers?

CareCredit monitors merchants for anti-consumer behavior, including through metrics such as disputes and chargebacks, as well as through other types of complaints. Merchants who are deemed to be high risk based on these metrics may be terminated or requested to take corrective action. Those who do not take the appropriate action are terminated. In this context, CareCredit terminated approximately 550 merchants from the network between January 1, 2021 and December 31, 2022.

CareCredit reviews those transactions that consumers dispute, regardless of the merchant status.

Question 2: Please share additional delinquency rate data for CareCredit cards. Is the delinquency rate for CareCredit cards higher than credit cards issued by the company as a whole? Specifically, what percentage of CareCredit cards were 30 or more days past due?

CareCredit's 30 day+ delinquency rate was less than 5% for the 12-month period ended September 30, 2022.

Question 3: Please provide a list of all hospitals in your network and share whether they are non-profit or for-profit hospitals.

Schedule I attached hereto contains a list of entities CareCredit has identified as either a hospital, or a department within the hospital, that participates in some way in the CareCredit network. CareCredit does not have information regarding the tax status for the vast majority of these entities. For the few that CareCredit has such information, those that are nonprofit are marked with a single asterisk and those that are for profit are marked with two asterisks.

Question 4: Does CareCredit bar hospitals from billing patients who may be eligible for free or reduced-price care, or for coverage through government or private-sector insurance? Please provide copies of the language described in your written response that "specifically state[s] that the CareCredit program is designed to operate alongside (and not part of or in lieu of) such system's existing assistance programs."

Payment card networks do not have a role in determining which patients a hospital bills or how much they are billed for particular components of their care. In fact, HIPAA precludes CareCredit from receiving the information needed to make such determinations, except in limited instances where we are required to adjudicate a dispute to which information would be relevant.

Our template multiyear agreement for health systems contains the following recital:

"The [CareCredit] Program is designed to be offered to Health System patients pre-service, at point of service, and post-service, and operate alongside (and not part of or in lieu of) Health System's existing patient assistance or financial assistance programs."

Question 5: Please provide a description of the sponsorship or royalty payments that CareCredit provides to professional and other associations.

CareCredit's relationships with professional and other associations pertain to associations of commercial, not consumer, entities. The terms of these relationships vary, but generally provide for one or more of the following types of payments made by CareCredit to the association:

- A sponsorship payment (often in conjunction with CareCredit being recognized as a sponsor at the association's annual tradeshow or meeting);
- An enrollment royalty where CareCredit pays the association an amount for each professional member (e.g. dentist, veterinarian, cosmetic surgeon) that the association refers to the CareCredit network; or
- A sales royalty where CareCredit pays the association a percentage of the sales resulting from new professional member enrollments attributed to the association.

Question 6: Please provide copies of course materials described in your response to question #15.

These materials are proprietary and confidential. However, the training materials address the substance the CFPB deemed important with respect to CareCredit's training of providers in connection with participating in the CareCredit network.

Question 7: What is CareCredit's merchant discount rate?

The merchant discount rate for the CareCredit network (*i.e.*, the amount a merchant pays CareCredit in connection with its acceptance of a CareCredit card for payment) will vary based on a variety of factors, but it is generally higher than what a merchant would pay to accept other payment card brands (*e.g.*, Mastercard, Visa).

Schedule I

Idaho Falls Community Hospital
NewYork-Presbyterian/Columbia University Irving Medical Center
UAB Callahan Eye Hospital
Acclaim Physician Group
Advanced Diagnostics Healthcare System
AdventHealth*
Adventist Health
Allegiance Health Management
Alliant Management Services
Ardent**
Arise Austin Medical Center
Arkansas Heart Hospitals
Arkansas Valley Regional Medical Center
Artesia General Hospital
Ascension Health
Aspirus System
Astria Health
AtlantiCare*
Atrium Health
Augusta University Medical Center*
Aultman Health Foundation
Avala Hospital
Avera Health
Banner Health
Baptist Health (Jacksonville FL)
Baptist Health (Louisville KY)
Baptist Health South Florida
Baptist Memorial Health Care Corporation
Bassett Healthcare
BayCare Health System
Baylor Scott & White Health*
Baystate Health
Bear Valley Community Hospital
Bellevue Hospital
Berkshire Health System
Billings Clinic Health System
Blake Medical Center
Blanchard Valley Health System
Blessing Health System
Boone Hospital Center
Boys Town National Research Hospital
Broadlawns Medical Center
Caldwell Medical Center
Candler County Hospital
Candler Medical Group
Cape Fear Valley Health System

Carilion Clinic
Carroll County Memorial Hospital
Cass County Memorial Hospital
Central Louisiana Surgical Hospital
Central Maine Healthcare*
Charleston Area Medical Center Health System
Chase County Community Hospital
Cherokee Indian Hospital
Cheyenne County Hospital
Choctaw Memorial Hospital
CHRISTUS Health
City of Hope
Cleveland Clinic Health System*
Colquitt Regional Medical Center
Columbus Community Hospital
CommonSpirit Health
Community Health Center of Central Wyoming Inc
Community Health Systems
Cooper University Hospital
Coos County Family Health Services Inc
CoxHealth*
Crittenden Community Hospital
Crockett Medical Center
Dallas County Hospital
Dallas Medical Center
Dartmouth Health
Dartmouth-Hitchcock Health
Desert Sage Health Centers
Desert Winds Hospital
Dignity Health
Doctors Hospital at Renaissance Health
Doctors Memorial Hospital
Donley Memorial Clinic
Drumright Regional Hospital
Duke Health
East Alabama Medical Center Health System
Eastland Memorial Hospital
Edgerton Hospital and Health Services
Edgewood Surgical Hospital
Effingham Health System
Elbert Memorial Hospital
Ellenville Regional Hospital
Ellis Medicine
Emergency Hospital Systems
Emerson Hospital
Eminent Medical Center
Emory Healthcare*
Englewood Womens Health Pc

Envision Healthcare
Essentia Health*
Executive Imaging LLC
Fairfield Medical Center
First Baptist Medical Center
Flagler Health
Forest Health Medical Center System
Franklin County Medical Center
Fresno Health
Froedtert & the Medical College of Wisconsin
Genoa Community Hospital
Gerald Champion Regional Medical Center
Glenwood Regional Medical Center
Golden Plains Community Hospital
Goodlife Physical Medicine
Gov Juan F Luis Hospital & Medical Center
Grant Regional Health Center
Great Lakes Health System of Western New York
Great Plains Regional Medical Center
Great River Health System
Gundersen Lutheran Med Center
Hackensack Meridian Health
Hancock County Memorial Hospital
Hannibal Regional Hospital
Hawaii Health Systems Corp
HCA Healthcare
Eskenazi Health*
Health First*
Hendrick Health
Hendricks Regional Health
Hereford Regional Medical Center
Heritage Valley Health System
Hill Regional Hospital
Hillsboro Community Hospital
Hoag Health System
Holy Cross Hospital
Holy Name Medical Center
Horizon Health
Houston Physicians Hospital
HPI Community Hospital
Hudson Regional Hospital
Jackson Hospital
Jeff Davis Hospital
Jefferson Health
Johnson County Hospital
Johnson Memorial Hospital
Kaiser Permanente*
Kimball Health Services

Kings Daughters Health System
Knox Community Hospital
La Paz Regional Hospital
Lafayette General Surgical Hospital
Lake Health
Lauderdale Community Hospital
Lawrence Memorial Hospital
Lehigh Valley Health Network
Licking Memorial Health Systems
LifePoint Health
Main Line Center for Oral & Maxillofacial Surgery LTD
Main Line Health
Major Health Partners Medical Center
Manhattan Surgical Hospital
Maria Parham Medical Center
Marillac Community Health Centers
Marshall Browning Hospital
Marshall Health"
Mary Rutan Hospital
Mary Washington Healthcare*
Marys Center for Maternal and Child Care Inc
Mass General Brigham (FKA Partners HealthCare)
McBride Clinic Orthopedic Hospital LLC
McKenzie Memorial Hospital
Medical City Dallas
MedStar Health
Memorial Health System (Marietta OH)
Memorial Hermann Health System
Memorial Hospital of Union County
Mercy (MO)*
Mercyhealth
MercyOne
Methodist Health System
Mile Bluff Medical Center
Monroe Surgical Hospital
Montefiore Health System
Mosaic Life Care
New York Health Physicians
NewYork-Presbyterian Healthcare System
Nobilis Health Corp
North Caddo Medical Center
North Canyon Medical Center
North Country Family Health Center Inc
North Mississippi Health Services
Northeast Alabama Regional Medical Center Health System
NorthShore University Health System
Northwood Deaconess Health Center
Novant Health

Nutex Health
Oaklawn Hospital
Ochsner Health System*
Ohio Valley Surgical Hospital
OhioHealth
Olney Family Clinic
Olney Hamilton Hospital
OptumCare
Orlando Health
Osmond General Hospital
Ouachita County Medical Center
Ozarks Medical Center
Pembina County Memorial Hospital
Pender Community Hospital
Penn Highlands Healthcare
Phoebe
Piedmont Healthcare System
Pikeville Medical Center
Pipeline Health LLC
Plano Surgical Hospital
Prime Healthcare Services**
ProHealth Care
Providence Medical Center
Prymed Medical Care Inc
PSN Affiliates
Pulse Healthcare System
Regional Health
Regional One Health
Riverside Medical Clinic
Riverview Hospital
Rochester Regional Health System
Rome Memorial Hospital
Rural Health Group Inc
Rush Health System
Rush University System for Health
Saint Francis Health System
Samaritan Medical Center
Sanford Health
SCA Health
Schneider Regional Medical Center
Self Regional Healthcare
Shields Health Care Group
Signature Healthcare Brockton Hospital
South Big Horn County Hospital
Southern Coos Hospital and Health Center
Sovereign Health - Surgicare
Sparrow Health System
Spring plus Heights Hospital

Springhill Medical Center
SSM Health
St Charles Surgical Hospital
St Croix Regional Medical Center
St Lukes Hospital Health System
St Lukes University Health Network*
Stephens County Hospital
Stevens County Hospital
Steward Health Care System
Summa Health System
Summit Healthcare Regional Medical Center
Summit Medical Center
SUNY Health Sciences Centers
SurgCenter Development
Surgery Partners
Sutter Health
Tanner Health System
Taylor Health Care Group
Tenet Healthcare
Texas County Memorial Hospital
Texas Health Resources
The Hospital at Westlake Medical Center
The MetroHealth System
The Summit Surgical Hospital
The University of Kansas Health System
The University of Tennessee Medical Center
The Woodlands Specialty Hospital
Thibodaux Regional Health System
Tift Regional Health System
Titus Regional Medical Center
Total Womens Health of Baltimore
Tower Health
Townsen Memorial Hospital
Trace Regional Hospital
Tri Valley Health Center
Trinity Health
Truman Medical Centers
Tuolumne Me-Wuk Indian Health Center
UAB Callahan Eye Hospital
UAB Medicine
UAB Medicine
UMass Memorial Health Care
UNC Health
UNC Rex Healthcare
United Memorial Medical Center
Universal Health Services
University Health
University Hospitals Health System

University of California (UC) Health
University of Maryland Charles Regional Medical Center
University of Maryland Medical System
University of Miami Health System
University of Mississippi Healthcare
University of Missouri Health Care
University of Pittsburgh Medical Center
University of Tennessee Medical Center
University of Texas System
University of Wisconsin Health
UPMC Central Pennsylvania
Uvalde Memorial Hospital
Valley View Hospital
ValueHealth
Vanderbilt University Medical Center System
Virginia Mason Health System
Wagoner Community Hospital
Washington County Hospital
WellSpan Health
West Hawaii Community Health Center Inc
Westchester General Hospital
Western Maryland Regional Medical Center
Wray Community District Hospital
WVU Medicine
Wyandot Memorial Hospital
Wyckoff Heights Medical Center