



February 16, 2026

Eugene Emergency Physicians
c/o: Dr. Brad Anderson

Re: Support for continued service at PeaceHealth

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Dr. Anderson and colleagues of Eugene Emergency Physicians:

AAEM is a national professional society representing over 8,000 specialists in Emergency Medicine and we are pleased to provide this letter to support your continued service to this institution. The AAEM endorses the notion that local physician ownership of their practice is the best arrangement for the physicians, the medical staff, the hospital and, most importantly, for the patient. It is our understanding that an out-of-state staffing company, ApolloMD, has been awarded your longstanding contract for emergency services.

Replacement of a well-functioning EM physician group should never be taken lightly as this can affect patient care, medical staff relationships and the hospital itself. Incumbent EM physicians are knowledgeable in the local factors required to deliver the safest and most efficient care to a hospital's patients. They know how to "push the right buttons" to save lives and can effectively interact with the nursing and medical staff to deliver high quality care. We believe the local democratic ownership of your group is worth vigorously preserving.

It is also our position that the organized Medical Staff should be involved in the decision regarding a change in the contracted services for Emergency Medicine. Under the Code of Federal Regulations Conditions for Participation of Hospitals § 482.22 the Medical Staff is charged with responsibility for the quality of medical care in the hospital. The Joint Commission similarly points this out in the Medical Staff Standards (MS.01.01.01). Regarding a contracted service for the provision of medical care, the Medical Staff must have input into the selection. This is described in first item of Elements of Performance under the Joint Commission Leadership standard on contracted services (LD.04.03.09). We recommend engagement of the Medical Staff leadership in this matter.

Given that ApolloMD until last year was backed by ValorBridge, a private equity interest, a review of their structure as it pertains to the new Oregon law (SB 951) regarding the corporate practice of medicine should be made clear to affected physicians.(1) SB 951 prohibits ownership of a medical practice by physicians with a significant stake in the management-services organizations (MSOs).

Additionally, depending on the structure of the MSO, physicians must retain control of all decisions related to the practice. (2)

Finally, as you know, several large multi-state ED staffing companies (American Physician Partners, Envision, NES) have recently declared bankruptcy and left EM physicians without malpractice coverage and unpaid shifts. (3) Given the recent exit of PE from ApolloMD, the question of how much debt the entity bears, and its financial solvency is of utmost importance to physicians.

Dr. Anderson, your group, has the support of the Academy on this matter. We are available to further assist at your request.

Respectfully yours,

A handwritten signature in black ink, appearing to be 'RF' or similar initials, written in a cursive style.

Robert Frolichstein, MD FAAEM
President, AAEM

References:

1. <https://pitchbook.com/profiles/investor/55462-33>
2. Zhu JM, Rooke-Ley H. Regulating corporate control in health care – Oregon’s attempt to revive the CPOM doctrine. NEJM 2025; 393: 1972-74.
3. <https://www.aaem.org/wp-content/uploads/2025/03/NES-Statement.pdf>