

MESCH CLARK ROTHSCILD
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Proposed Patient Care Ombudsman

**UNITED STATES BANKRUPTCY COURT
 EASTERN DISTRICT OF WASHINGTON**

In re:

Chapter 11

ASTRIA HEALTH, et.al. ¹

Case No. 19-01189 FLK

Jointly Administered

Debtors in Possession,

**VERIFIED STATEMENT OF
 SUSAN N. GOODMAN**

STATE OF ARIZONA)
) ss.
 COUNTY OF PIMA)

I, Susan N. Goodman, under penalty of perjury, declare as follows:

1. I have personal knowledge of the facts stated herein, and if called as a witness, I could and would competently testify thereto under oath in accordance with this Verified Statement.

¹ The Debtors, along with their case numbers, are as follows: Astria Health (19-01189), Glacier Canyon, LLC (19-01193), Kitchen and Bath Furnishings, LLC (19-01149), Oxbow Summit, LLC (19-01195), SHC Holdco, LLC (19-01196), SHC Medical Center-Toppenish (19-01190), SHC Medical Center-Yakima (19-01192), Sunnyside Community Hospital Association (19-01191), Sunnyside Community Hospital Home Medical Supply, LLC (19-01197), Sunnyside Home Health (19-001198), Sunnyside Professional Services, LLC (19-01199), Yakima Home Care Holdings, LLC (19-01201), and Yakima HMA Home Health, LLC (19-01200).



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2. I am a duly licensed attorney and RN in the State of Arizona. My office is located at Mesch Clark Rothschild P.C., 259 N. Meyer Ave., Tucson, AZ, 85701. My telephone number is (800) 467-8886 x 141; fax number (520) 798-1037. My law practice focuses on health care compliance provider support.
3. I am a person eligible and competent to perform the duties as patient care ombudsman ("PCO") in the above-captioned case pursuant to 11 U.S.C. § 333. My qualifications to perform the required functions of a PCO in this case are evidenced by my Curriculum Vitae, attached hereto as Exhibit A.
4. My billing rate is \$375.00 per hour and paraprofessional rates are \$145.00 – \$195.00 per hour. I will apply for payment of compensation and reimbursement of expenses from this Court pursuant to applicable provisions of the United States Bankruptcy Code, including but not limited to 11 U.S.C. § 330, the Bankruptcy Rules, the Local Rules, and pursuant to any orders of this Court establishing interim compensation and reimbursement of expenses for Chapter 11 professionals.
5. To the best of my knowledge, I am a disinterested person as defined in 11 U.S.C. § 101(14), and I do not hold, nor do I represent any material interest adverse to this bankruptcy estate.
6. I have no connection, nor any individual members of my firm, with the debtors, their creditors, the Chapter 11 Trustee, other parties in interest, their respective attorneys and accountants, the United States Trustee, or any person employed in the Office of the United States Trustee, except in the above-referenced Chapter 11 proceeding and as follows:
 - a. In the District of Arizona, I served as the PCO for a specialty surgical hospital under case no. 13-20029, with those duties now completed.

- 1 b. In the Northern District of Texas, I served as the PCO for five long-term care
2 facilities at a CCRC under consolidated case no. 14-32821, with those duties
3 now completed.
- 4 c. In the Northern District of Georgia, Rome Division, I served as the acute-care
5 PCO in consolidated case no. 14-42863, with those duties now completed.
- 6 d. In the Southern District of Texas, Houston Division, I served as the PCO for a
7 hospital and outpatient department facilities under consolidated case no. 15-
8 31086, with those duties now completed.
- 9 e. In the District of New Mexico, I served as the PCO for outpatient primary and
10 urgent care clinics throughout New Mexico under consolidated case no. 15-
11 11247, with those duties now completed.
- 12 f. In the District of New Jersey, I served as the acute care PCO for one hospital
13 under consolidated case no. 15-24999, with those duties now completed.
- 14 g. In the Eastern District of Texas, Sherman Division, I served as the PCO for a
15 hospital in case no. 15-41684, with those duties now completed.
- 16 h. In the Southern District of Texas, Houston Division, I served as the PCO for
17 a hospital in case no. 15-35370 until the case was converted to one under
18 Chapter 7.
- 19 i. In the Southern District of Texas, Galveston Division, I served as the PCO
20 for three senior living facilities under consolidated case no. 15-80399, with
21 those duties now completed.
- 22 j. In the Northern District of Texas, Dallas Division, I served as the PCO for a
23 hospital in case no. 16-40198, with those duties now completed.
- 24 k. In the Northern District of Texas, Dallas Division, I served as the PCO for a
25 hospital in case no. 16-40273, with those duties now completed.
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1. In the Western District of Texas, El Paso Division, I served as the PCO for an outpatient radiation oncology clinic, initially in a Chapter 11 proceeding in case no. 16-30078, until case dismissal; and, later during the Chapter 7 proceeding in a limited capacity while patient treatment completion was accomplished in case no. 16-31056, with those duties now completed.
- m. In the Southern District of Iowa, Des Moines Division, I served as the PCO for a hospital and its related outpatient facilities and clinics in case no. 16-02438, with those duties now completed.
- n. In the Eastern District of Louisiana, New Orleans, I served as the PCO for a hospital and its related outpatient facilities and clinics in consolidated case no. 17-10353, with those duties now completed.
- o. In the Eastern District of Texas, Sherman Division, I served as the PCO for a hospital district in Chapter 9 case no. 17-40101, with those duties now completed.
- p. In the Southern District of Texas, Houston Division, I served as the PCO for a hospital in case no. 17-31078, with those duties now completed.
- q. In the District of Arizona, I served as the PCO for a hospital case in case no. 17-03351, with those duties now completed.
- r. In the Central District of California, Santa Ana Division, I served as the PCO for residential substance use disorder treatment facilities in case no. 17-12213, with those duties now completed.
- s. In the Western District of Louisiana, I served as the PCO for long-term acute-care hospitals ("LTACs") across seven different states under consolidated case no. 17-50799, with those duties now completed.
- t. In the Eastern District of Washington, I served as the PCO for a hospital district in Chapter 9 case no. 17-02025 that included two hospitals, an urgent

1 care clinic, and various outpatient facilities, with those duties now
2 completed.

- 3 u. In the Western District of Texas, San Antonio Division, I am currently
4 serving as the PCO for the skilled and long-term care residents of a CCRC
5 under case number 18-50608.
- 6 v. In the District of Arizona, I served as the PCO for a small inpatient
7 substance use detox facility under case number 17-11494, with those duties
8 now completed.
- 9 w. In the Southern District of Texas, Houston Division, I served as the PCO for
10 free-standing emergency centers under consolidated case number 18-33836,
11 with those duties now completed.
- 12 x. In the Western District of Texas, Waco Division, I served as the PCO for a
13 healthcare system that included rural and critical access hospitals, rural
14 health clinics, hospital outpatient departments, and medical clinics under
15 consolidated case number 18-60526 with those duties completed upon
16 conversion of the case to a Chapter 7 proceeding.
- 17 y. In the Western District of Texas, Austin Division, I am currently serving as
18 the PCO for a Debtor providing mobile x-ray and, initially, lab services
19 under consolidated case number 18-11569.
- 20 z. In the Northern District of Texas, Dallas Division, I am currently serving as
21 the PCO for a CCRC facility located in Carmel, Indiana under case number
22 19-30283.
- 23 aa. In the Northern District of Texas, Dallas Division, I am currently serving as
24 the PCO for four, memory-care assisted living facilities in the Houston
25 metropolitan area under consolidated case number 19-31484.
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Susan N Goodman

Susan N. Goodman
Arizona State Bar No. 019483
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Proposed Patient Care Ombudsman


Notary Public

OFFICIAL SEAL
LEIGHANN VOLKER
NOTARY PUBLIC-ARIZONA
PIMA COUNTY
My Comm. Exp. Nov. 30, 2020

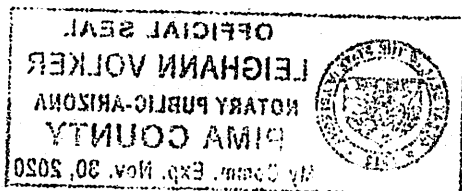


EXHIBIT A
SUSAN NIELSEN GOODMAN



PROFESSIONAL SUMMARY

Healthcare attorney dedicated to patient-centered, collaborative, operational compliance.

SKILLS

- Regulatory Compliance ▪ Auditing ▪ Contracts ▪ Staff Education ▪ Process Improvement
- Process and Forms Development ▪ Bankruptcy Patient Care Ombudsman ▪ Medical Staff/Governance

WORK HISTORY

Mesch Clark Rothschild – Tucson, AZ

July 2013 – Present

ATTORNEY

- Established firm's regulatory compliance healthcare practice; including but not limited to, HIPAA/HITECH, Stark, AKS/FCA, PPACA, practice management, medical staff, contracts, and patient care/privacy ombudsman in bankruptcy reorganization.
- Ombudsman appointments include:
 - Surgical Specialty Hospital of Arizona; D AZ (Phoenix); 13-20029
 - Sears Methodist Retirement System; ND TX (Dallas); 14-32821
 - Hutcheson Medical Center; ND GA (Rome); 14-42863
 - University General Health System; SD TX (Houston); 15-31086
 - Santa Fe Medical Group; D NM; 15-11247
 - Saint Michael's Medical Center; D NJ; 15-24999
 - Forest Park Medical Center, Frisco; ED TX (Tyler); 15-41684
 - Spring Central Hospital; SD TX (Houston); 15-35370
 - UGHS Sr. Living; SD TX (Galveston); 15-80399
 - Border Medical Specialists Chapter 11; WD TX (El Paso); 16-30078
 - Forest Park Medical Center, Ft. Worth; ND TX (Ft. Worth); 16-40198
 - Forest Park Medical Center, Southlake; ND TX (Ft. Worth); 16-40273
 - Border Medical Specialists Chapter 7; WD TX (El Paso); 16-31056
 - Central Iowa Healthcare; SD IA (Des Moines); 16-02438
 - Louisiana Medical Center Heart Hospital; ED LA (New Orleans); 17-10353
 - North Texas Medical Center/ Gainesville Hospital District Chapter 9; ED TX (Sherman); 17-40101
 - Humble Surgical Hospital; SD TX (Houston); 17-31078
 - Green Valley Hospital; D AZ (Tucson); 17-03351
 - Solid Landings Behavioral Health, Inc; CD CA (Santa Ana); 17-12213
 - Acadiana Management Group, LLC, *et al.*; WD LA (Lafayette); 17-50799
 - Kennewick Public Hospital District Chapter 9; WD WA (Spokane); 17-02025
 - Eden Home, Inc.; WD TX (San Antonio); 18-50608
 - Scottsdale Detox Center of Arizona, LLC; D AZ (Phoenix); 17-11494
 - Neighbors Legacy Holdings, Inc.; SD TX (Houston); 18-33836
 - Little River Healthcare Holdings LLC, *et al.*; WD TX (Waco); 18-60526
 - Corridor Medical Services, Inc.; WD TX (Austin); 18-11569
 - Mayflower Communities, Inc.; ND TX (Dallas); 19-30283
 - The LaSalle Group, Inc.; ND TX (Dallas); 19-31484
 - CAH Acquisition Company #5, LLC; D KS (Wichita); 19-10359

Ascension Health/Carondelet St. Mary's Hospital – Tucson, AZ

January 2008 - June 2013

CRITICAL PRODUCTS MANAGER, THE RESOURCE GROUP

- Provided liaison support between consultant groups, service line leadership, physicians, and supply chain staff as part of readiness effort to move to PeopleSoft based national ordering system.
- Led national contract effort for supplies deemed critical by local clinician partners.

SENIOR ANALYST, RESOURCE & SUPPLY MANAGEMENT GROUP

- Supported Chief Resource Officer in policy development, presentation preparation, and business strategy development (spine cost-per-case, heart valves, quarterly updates).
- Developed a price over-ride process that maximized contract price compliance.
- Analyzed complex new device requests including presentations to senior leadership & clinician customers to gain buy-off on recommended direction (Aquamantys, Concentric Merci).
- Collaborated with service line leadership and consulting teams in data refinement and proofing for projects related to strategic business analysis.
- Collaborated with IT/IS to improve MediTech MM utilization, including three custom RSMG reports, scripting of item master additions/changes.

REVENUE LIAISON AUDITOR

- Provided critical liaison support between PFS, nurse auditing, contract management, and the service line with an emphasis on process/revenue improvement for the cardiac, neurological, and hospice service lines.
- Analyzed new procedure requests with recommendations to senior leadership.
- Continued with emergency center billing training and auditing support.
- Collaborated with supply chain on cost-per-case analysis and procedural profitability.

CLINICAL DOCUMENTATION SPECIALIST

- Re-designed emergency center documentation using a bedside approach to ensure compliance, simplification, and communication of care across the care continuum.
- Collaborated with lab to improve the point-of-care lab process and led the team to reduce the order error rate from over 60% to less than 5%.
- Created and implemented a billing process that was later launched across the network as a best practice.
- Participated in the corporate responsibility committee as the unit-based representative.
- Collaborated with care management, admitting, and outside consultants on process improvements.

Boston Scientific Corporation – Maple Grove, MN

January 2007 – December 2007

CORONARY SALES REPRESENTATIVE

- Supported interventional, specialty, and diagnostic cath lab product lines with an emphasis on staff education, customer support, and service.
- Negotiated, closed, launched intra-vascular ultrasound at large, competitive hospital.
- Obtained contract compliance to market share agreement with largest customer

St. Jude Medical – Minnetonka, MN

May 2006 – January 2007

SALES REPRESENTATIVE

- Supported specialty product, closure device, and diagnostic product lines; ensured staff and physician certification supported patient outcomes; and grew sales to achieve top-10 national ranking by 2007.
- Provided nursing unit training to ensure competency with the closure system across the patient care continuum.

Guidant Corporation – Santa Clara, CA

April 2001 – May 2006

SENIOR, PRINCIPAL, AND TARGETED CLINICAL SALES SPECIALIST

- Specialized in simplifying technical concepts and training fellows and staff.
- Selected regional specialist for new concept product launches, i.e. brachytherapy.
- Obtained three promotions and two national awards providing interventional cardiology line support for Arizona and Southern New Mexico.

Chandler, Tullar, Udall & Redhair LLP – Tucson, AZ

May 2000 – April 2001

ASSOCIATE ATTORNEY

- Assisted in civil litigation insurance defense work including medical malpractice and personal injury.
- Recruited and prepared expert witnesses, including interaction with claims managers.

Court of Appeals, Division Two – Tucson, AZ

February 1999 – May 2000

LAW CLERK

- Drafted opinion and decision memoranda for Hon. J. Pelander and Hon. J. Howard.
- Proofed staff attorney decisions with administrative staff.

Hospice Family Care – Tucson, AZ

May 1994 – July 1995

DIRECTOR OF ADMISSIONS

- Managed admissions team of 8 – 10 staff.
- Negotiated payment for non-contracted hospice benefits with state indigent insurers.

Advanced Cardiovascular Systems, Inc. – Santa Clara, CA

July 1988 – May 1994

PERSONNEL REPRESENTATIVE, HUMAN RESOURCES DEPT.

- Selected as internal team-member for comprehensive field sales restructuring/redeployment project to work with external consulting firm.
- Provided field sales and engineering department human resource support, recruitment, and training.

ASSOCIATE PRODUCT MANAGER, MARKETING DEPT.

- Supported product management for balloon dilatation segment comprising 50% of corporate sales revenues.

CLINICAL SPECIALIST, FIELD SALES DEPT.

- Selected Clinical specialist of the year first year in the position.
- Provided field sales support for angioplasty product line.

Other Employment – Legal and Clinical – Michigan and Arizona

- Legal Project Work, various firms 1997 – 1998
- Clinical Nursing Positions—critical care unit (CCU) and cardiac cath lab 1985 – 1988

EDUCATION

University of Arizona James E. Rogers College of Law – Tucson, AZ

1998

JURIS DOCTOR

- GPA 3.7/4.0 (11/149); Order of the Coif; Summa Cum Laude
- Arizona Law Review, Executive Note Editor: 1997 – 1998

University of Phoenix – San Jose, CA

1992

BACHELOR OF SCIENCE, BUSINESS ADMINISTRATION

Bronson Hospital School of Nursing – Kalamazoo, MI

1985

RN DIPLOMA

- First Honors and Nursing Excellence Award

LICENSES / MEMBERSHIPS

- Arizona State Bar #019483
- Arizona RN #059995

- American Health Lawyers Association Member
- AZBIO (Arizona Bioindustry Association) Member