

**UNITED STATE OF AMERICA  
BEFORE THE FEDERAL TRADE COMMISSION**

**COMMISSIONERS:**       **Joseph J. Simons, Chairman**  
                                  **Noah Joshua Phillips**  
                                  **Rohit Chopra**  
                                  **Rebecca Kelly Slaughter**  
                                  **Christine S. Wilson**

**File No. P181200**

**RESOLUTION DIRECTING USE OF COMPULSORY PROCESS TO COLLECT  
INFORMATION REGARDING CERTIFICATES OF PUBLIC ADVANTAGE**

**Nature and Scope of Matter:**

To assess the impact of Certificates of Public Advantage (COPAs), also known as Cooperative Agreements, on prices, quality, access, and innovation for healthcare services, as well as on health system employee wages, and to examine how these attributes may differ in COPA regulatory approaches as compared to market-based competition approaches. The Federal Trade Commission hereby resolves and directs any and all compulsory processes available to it be used in connection with this inquiry.

**Authority to Conduct Investigation:**

Sections 6, 9, 10, and 20 of the Federal Trade Commission Act, as amended, 15 U.S.C. §§ 46, 49, 50, 57b-1; FTC Procedures and Rules of Practice, 16 C.F.R. § 1.1 *et seq.*, and supplements thereto; Section 7 of the Clayton Act, 15 U.S.C. § 18, as amended.

By direction of the Commission.

April Tabor  
Acting Secretary

Issued: