



January 8, 2026

VIA EMAIL AND REGULAR MAIL

Bahaa Wanly  
President  
Legacy Emanuel Medical Center  
501 N Graham St,  
Portland, OR 97227

Re: **Demand to Bargain**  
Immigration and Customs Enforcement – Memorandum of Understanding

Dear President Wanly:

We are writing in follow-up to our December 10 letter to you in which we raised concerns over Legacy Emanuel Medical Center's (LEMC) compliance with State and Federal law relating to patients who are ICE detainees. These concerns centered on Legacy's potential failure to comply with basic tenets of patient confidentiality, patient autonomy over medical decisions, and the Oregon Nurse Practices Act. In that letter, we requested to have an opportunity to meet with you and your leadership team within 14 days to discuss these concerns.

Unfortunately, other than acknowledging receipt of our letter, Legacy has utterly failed to provide any substantive response. The only response has been through the media where Legacy bemoaned the fact that we had not addressed these concerns privately before making them public. However, given your continued inaction for nearly four weeks following that letter, it should be clear that no matter how much time is given, Legacy appears to be incapable of substantively engaging on this issue without a more formal process.

For that reason, we are now calling on Legacy to engage immediately in substantive negotiations over this issue. To that end, we are enclosing a proposed Memorandum of Understanding that sets out the substantive changes that we would like implemented, in order for our members to safely care for these patients in Legacy facilities. This MOU reflects a number of the requests that we had made in our earlier letter, including:

- Verifying and documenting ICE credentials to ensure accountability and legal compliance.
- Strengthening clinical documentation of all ICE-related encounters, including arrest circumstances and use of force.
- Limiting law enforcement presence in clinical areas and during sensitive exams.
- Centralizing all disclosures of protected health information (PHI) to prevent unlawful sharing.
- Ensuring detained patients receive “Know Your Rights” information and access to legal and social-support resources
- Protecting nurses from retaliation when they raise patient-safety or ethical concerns.

Because Legacy has declined to engage in any dialogue, ONA is now calling on the health system to sign a formal **Memorandum of Understanding (MOU) on ICE and Law Enforcement Presence in Healthcare Settings**.

This proposed MOU would establish clear, enforceable standards at Legacy Emanuel, including:

- Requiring ICE and all federal law enforcement to comply with legal requirements before questioning, searching, or detaining anyone in a hospital.
- Preserving patient privacy by restricting law enforcement access to clinical spaces without proper legal authority.
- Reaffirming that law enforcement is never the medical decision-maker and may not interrupt or terminate care.
- Upholding HIPAA protections for all patients, including those in custody.
- Providing patient education, interpreter access, and connections to legal and social services.
- Creating a joint labor-management committee to oversee implementation and training.
- Guaranteeing non-retaliation for nurses who advocate for patient safety, privacy, and ethical care.

We stand ready to begin to meet and bargain over this MOU. We recognize that Legacy may have other language or changes it may want in this MOU and we are open to finding consensus. What we are unwilling to abide by is the continued silence from Legacy while our members and their patients suffer the consequences of Legacy's inaction. Please have your labor relations staff, or labor counsel, contact me as soon as possible to begin this negotiation process.

Sincerely,

A handwritten signature in black ink, appearing to read 'T. Doyle', with a stylized flourish at the end.

Thomas Doyle  
ONA General Counsel

cc: Sarah Hale Esq.