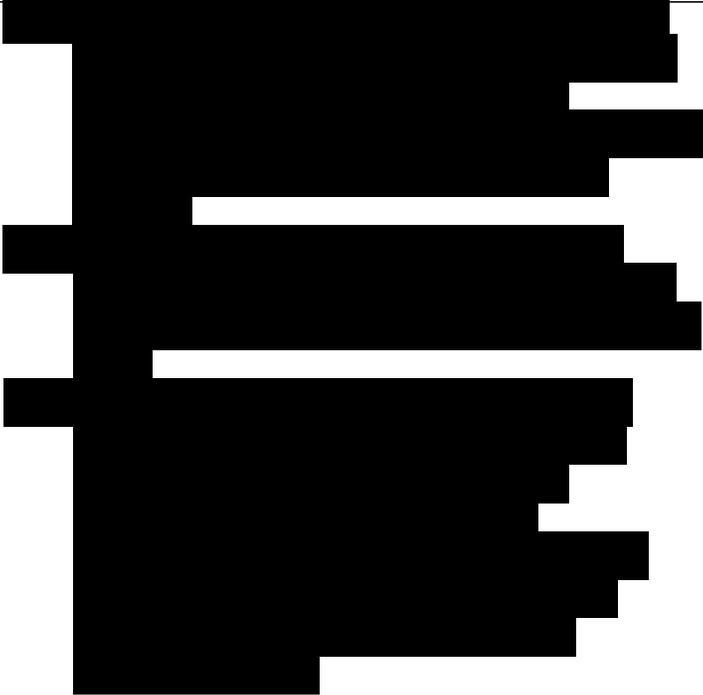
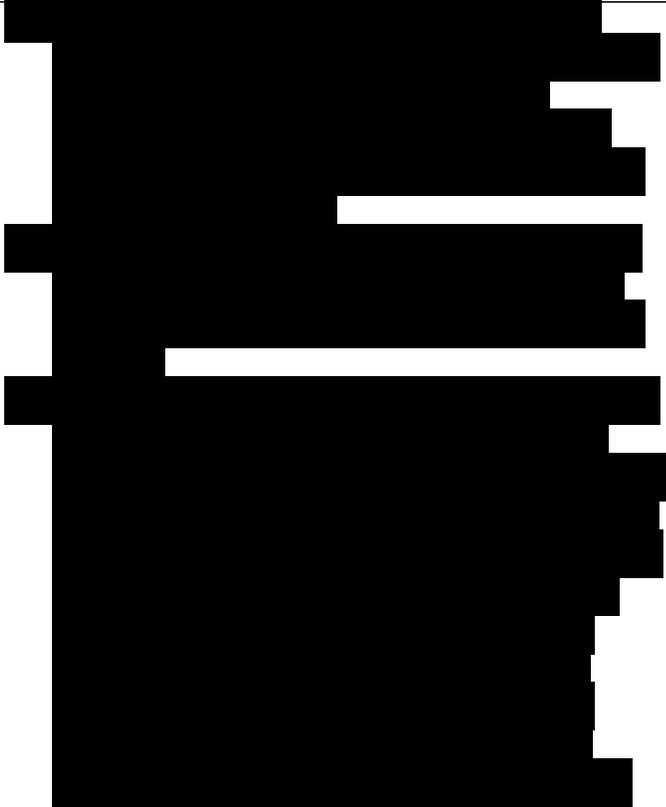


**December 3, 2020 Transacting Parties Response to RIAG Fourth Supplemental Questions Dated November 20, 2020**

	<b>HCA Question</b>	<b>AG Supplemental Questions</b>	<b>Transacting Party Response</b>
S4-1	Governance	Provide all communications and documents exchanged between Prospect and/or any Prospect representative(s) and CCCB, any CCCB representative, and/or any former or current Category A PCC board member regarding the removal and appointment of the Category A PCC board members by the CCCB Liquidating Receiver on July 22, 2020.	Please see Bates No. C-CIIH-007826 to C-CIIH-008004.
S4-2	Revised Exhibit 4		

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S4-3	Revised Exhibit 4		
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S4-4	Question S2-9	[REDACTED]	[REDACTED]
S4-5	Questions S2-9, 12, 13 and S3-15	[REDACTED]	[REDACTED]
S4-6	Question S2-16	Please provide the Capital Commitment Reconciliation Memo that was presented and reviewed by Von Crockett at the July 10, 2019 PCC board meeting (C-CIIH16-006223).	Please see Bates No. C-CIIH-008094 to C-CIIH-008096.
S4-7	Question S2-16	[REDACTED]	[REDACTED]

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S4-8	Question S2-16		<p>The PCC Capital Planning Worksheet was established to track projects/spend against the APA obligation of Non-Routine (\$50M) and Routine (\$40M). Capital was tracked in this manner until FY19 when the APA obligations were fulfilled. The worksheets from 2014 to 2019 can be found in the PCC Board Meeting presentation materials at Bates No. C-CIIH-008097 to C-CIIH-008230.</p>
S4-9	Question S2-20		

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S4-10	Question S2-23	<p>Please provide the following information regarding the PMH pension liability:</p> <ul style="list-style-type: none"><li>a. Are all pension contributions made by PMH?</li><li>b. What is the plan with respect to paying down that liability?</li><li>c. What are annual contributions needed and over what time period, to adequately fund the pension?</li></ul> <p>[REDACTED]</p>	<p>Please note that none of the PMH Rhode Island entities have Defined Benefit Pension Plans. Any reference to funding pension plans is to pension plans existing in Connecticut and Pennsylvania PMH entities.</p> <p>[REDACTED]</p>
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S4-11	Question S2-25	[REDACTED]	IH and IIH are entirely pass-through entities that do not require financial statements. [REDACTED]
S4-12	Question S2-25	[REDACTED]	[REDACTED]
S4-13	Question S2-25	Please provide a third quarter summary document of financial results similar to the second quarter document provided at C-CIIH-006306.	Please see Bates No. C-CIIH-008231 to C-CIIH-008255.
S4-14	Question S2-25	[REDACTED]	[REDACTED]

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S4-15	Question S2-25	[REDACTED]	[REDACTED]
S4-16	Question S2-25	Please explain Note 6 at C-CIIH-006320.	[REDACTED]
S4-17	Question S2-25	[REDACTED]	[REDACTED]
S4-18	Question S2-25	[REDACTED]	[REDACTED]
S4-19	Question S2-25	[REDACTED]	[REDACTED]

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S4-20	Question S2-25	[REDACTED]	[REDACTED]
S4-21	Question S2-40	[REDACTED]	[REDACTED]
S4-22	Question S2-40	[REDACTED]	[REDACTED]

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S4-23	Question S2-40	<p>[REDACTED]</p> <p>[REDACTED]</p>	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>
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S4-24	Question S2-40		
S4-25	Question S3-11		

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S4-26	Financials	[REDACTED]	[REDACTED]
S4-27	Financials	[REDACTED]	[REDACTED]
S4-28	Financials	<p>What is the total amount of payroll tax deferral (both current/projected), if any, including the amount allocable to each of the RI hospitals, and when is the anticipated payment date of any deferred payroll taxes?</p>	<p>Please see Bates Number C-CIIH-008257.</p>
S4-29	Financials	<p>Please confirm or correct the statement in the ProPublica article dated September 30, 2020 that Prospect receives 80% of revenues from Medicare and Medicaid. With respect to Prospect generally, do you project Medicaid revenues will continue to increase in proportion to Medicare and managed care revenues? If so, is that in general and/or due to the impact of COVID?</p>	[REDACTED]

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S4-30	Financials	Please confirm the current percentage of Medicare and Medicaid patients at each RI hospital. With respect to the RI hospitals, do you project Medicaid revenues will continue to increase in proportion to Medicare and managed care revenues, if so, is that in general and/or due to the impact of COVID?	[REDACTED]
S4-31	Financials	Explain how the RI hospitals are recovering from the COVID-19 impacts to the hospital operations. What percentage do current operations represent the pre-COVID level operations at each RI hospital and how does this compare with PMH's other hospitals around the country?	[REDACTED]
S4-32	Financials	What longer term plans are in place to address COVID-19 financial impacts if recovery slows or shutdowns happen again and no federal/state relief is available?	Prospect is prepared to continue to provide quality care to its patients in the event of another shutdown with or without federal relief and has taken a number of measures to ensure such care continues. [REDACTED]

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S4-33	Financials		
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S4-34	Financials	<p>Lynn Leahey, Eleanor Milo and Jeffrey Liebman all referenced capital lists for the PCC hospitals in their statements under oath. Please provide:</p> <ol style="list-style-type: none"> <li>a. All budget requests made from PCC to PMH, including any and all revisions proposed by PMH, and the final approved budget for the prior three (3) fiscal years;</li> <li>b. The capital lists for RWMC and OLF for FY2018 through FY2021, which include the full list of all capital requests made by PCC to PMH;</li> <li>c. The capital budgets for FY2018 through FY2021, which include a breakdown for the allocated amounts for new projects versus replacement of aged projects; and</li> <li>d. An explanation of whether all projects that were budgeted for FY2018 through FY2020 were fully implemented, and if not, an explanation as to which projects, the amounts, and reasons for being put on hold.</li> </ol>	<p>As mentioned in S4-8, Prospect tracked capital spent categorizing Non-Routine and Routine separately from 2014-2019. Prospect did not have an annual capital budget approval process with PMH until the APA obligations were met in 2019. Prospect began a traditional capital budget process in FY20. Please see the attached the CCHP submitted budgets and the PMH approved budgets for FY20 &amp; FY21, at Bates Numbers C-CIIH-008258 to C-CIIH-008261. Any projects not completed (or only partially completed) at the end of the year were carried into the next fiscal year's budget list.</p>
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S4-35	Miscellaneous	Provide a detailed summary of any and all documents related to Leonard Green’s attempt to sell its ownership interest in Prospect in October 2015, including but not limited to the “confidential information memorandum” referenced in the ProPublica article dated September 30, 2020, and all documents related to the offers of Bain Capital and CVC Capital Partners.	
S4-36	Miscellaneous	Provide a detailed summary of any and all documents related to Leonard Green’s attempt to sell its ownership in Prospect in June 2018, including but not limited to presentations to the prospective buyers and a description of the informal discussions with CVC as referenced in the ProPublica article dated September 30, 2020.	
S4-37	Miscellaneous	Please provide a copy of the 2017 consultant’s report regarding operating rooms at Fatima discussed in the ProPublica article dated September 30, 2020.	Please see Bates No. C-CIIH-008262 to C-CIIH-008316.

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S4-38	Miscellaneous	Provide the status of the pending 1 <sup>st</sup> Circuit case, <i>NLRB v. Prospect CharterCARE</i> , Case No. 19-2289.	
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