



STATE OF RHODE ISLAND
OFFICE OF THE ATTORNEY GENERAL

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Peter F. Neronha
Attorney General

April 6, 2021

Via Electronic Mail Only

Patricia Rocha, Esq.
Adler Pollock & Sheehan P.C.
One Citizens Plaza – 8th Floor
Providence, RI 02903
Email: procha@apslaw.com

***Re: Hospital Conversion Initial Application of Chamber Inc.;
Ivy Holdings Inc.; Ivy Intermediate Holdings, Inc.; Prospect Medical
Holdings, Inc.; Prospect East Holdings, Inc.; Prospect East Hospital
Advisory Services, LLC; Prospect CharterCARE, LLC; Prospect
CharterCARE SJHSRI, LLC; Prospect CharterCARE RWMC, LLC (the
“Transacting Parties”)***

Dear Attorney Rocha:

Pursuant to Rhode Island General Laws § 23-17.14-32, the Office of the Attorney General has reviewed your request for confidential status for certain testimony given by Eleanor Milo at her Statement Under Oath on October 27, 2020 in the above-referenced matter. The Attorney General has determined that the testimony identified in the enclosed Exhibit A will be deemed confidential at this time for the reasons stated therein.

In the event any testimony shall lose confidential status, the Attorney General may deem the testimony public.

Sincerely,

Maria R. Lenz

Maria R. Lenz
Assistant Attorney General
marialenz@riag.ri.gov

MRL/dbm
Enclosure

cc: Leslie D. Parker, Esq., Adler Pollock & Sheehan P.C.
Jacqueline Kelley, Esq., Legal Counsel, RIDOH
Michael Dexter, Chief, Center for Health Systems Policy & Regulation, RIDOH
Fernanda Lopes, Chief, Office of Health Systems Development, RIDOH
Jessica Rider, Health Care Advocate, Special Assistant Attorney General

Exhibit A
Prospect/Chamber Inc. & Ivy Holdings, Inc.
Office of the Attorney General
Confidential Determinations for Transcript of
Statement Under Oath of Eleanor Milo, RN on
October 27, 2020

Transcript Cites	Description	Determination	Basis of Designation
18:2-35:4; 35:11-39:7	Discussion of patient-care policies and Nurse Milo's role in implementation.	Confidential	Confidential commercial and/or propriety information.
42:15-45:6	Discussion of staff relations and recruitment.	Confidential	Confidential commercial and/or proprietary information.
48:5-57:7	Discussion of nursing leadership and employee complaint process.	Confidential	Confidential commercial and/or proprietary information.
58:18-59:8	Discussion of Ms. Milo's relationship with other CNOs.	Confidential	Confidential commercial and/or proprietary information.

60:1-70:18	Discussion of quality, quality metrics, and hospital readmissions.	Confidential	Confidential commercial and/or proprietary information.
77:4-77:13	Discussion of internal senior leadership meeting.	Confidential	Confidential commercial and/or proprietary information.
83:2-84:9, 85:11-86:14	Discussion of cost controls.	Confidential	Confidential commercial, financial, and/or proprietary information.
89:7-97:11	Discussion of COVID-19.	Confidential	Confidential commercial and/or proprietary information.
99:15-113:6	Discussion of serious medical events and prevention.	Confidential	Confidential commercial and/or proprietary information.
124:19-125:12	Discussion of salary and family employment.	Confidential	Confidential commercial, financial, and/or proprietary information. Personal identifiable information, the disclosure of which would constitute a clearly unwarranted invasion of privacy.

127:6-130:12	Discussion of internal senior leadership meetings.	Confidential	Confidential commercial and/or proprietary information.
132:11-136:24	Discussion of employee relations and union status.	Confidential	Confidential commercial and/or proprietary information.
138:2-143:9	Discussion of Nurse Milo's involvement with building and equipment upgrades.	Confidential	Confidential commercial and/or proprietary information.
149:10-22	Discussion of relationship with Fatima CNO.	Confidential	Confidential commercial and/or proprietary information.
167:4-16	Discussion of capital needs difference between RWMC and Fatima.	Confidential	Confidential commercial and/or proprietary information.
168:5-172:23	Discussion of RWMC's service lines.	Confidential	Confidential commercial and/or proprietary information.

176:11-179:6	Discussion of nursing staff.	Confidential	Confidential commercial and/or proprietary information.
180:25-198:2	Discussion of daily census and quality surveys.	Confidential	Confidential commercial and/or proprietary information.
199:12-200:21	Discussion of investigation.	Confidential	Confidential commercial and/or proprietary information.
203:18-219:25	Discussion of RWMC's COVID-19 response and Prospect involvement.	Confidential	Confidential commercial and/or proprietary information.
221:5-225:3	Discussion of staffing generally, and COVID-19 effect on staffing.	Confidential	Confidential commercial and/or proprietary information.