



February 9, 2026

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VIA E-MAIL

Sarah Bartelmann, MPH
Cost Programs Manager
Oregon Health Authority
hcmo.info@oha.oregon.gov

Re: Responses to 01/14/2026 Supplemental Requests for Information – 063 Ascension - AMSURG

Dear Ms. Bartelmann:

On behalf of Ascension Health Alliance (“Ascension”), below are responses to the Oregon Health Authority’s (“OHA”) Supplemental Requests for Information dated January 14, 2026. Ascension incorporates by reference the Notice of Material Change Transaction Form and corresponding exhibits submitted to OHA on December 10, 2025 (“HCMO-1”). Ascension requests confidential treatment of the questions and responses provided in the Confidential Appendix.

1. Confidential Appendix, RFI #1(a): Ascension’s relationship to Regent Surgical Health, LLC (“Regent Surgical Health”) and Regent Surgical Management, LLC (“Regent Surgical Management”).

a. In the December 19 response, Ascension states that “Ascension has only a minority stake in Regent [Surgical Health]”. Further, Ascension_HCMO_00377 references an “acquisition of Regent in 2021” by Ascension. Please clarify if this current “minority interest” is the acquisition referred to in Ascension_HCMO_00377 or if this is referring to another transaction.

Ascension confirms that Ascension’s non-controlling limited partner economic interest in Regent disclosed in the December 19 response is the acquisition referred to in Ascension_HCMO_00377.

For additional information, see the Confidential Appendix.

2. In the December 19 Response, RFI#1(a), Ascension states that Regent Surgical Management is “indirectly co-owned by a subsidiary of Ascension and affiliate of Regent.” Please provide legal names of both referenced entities. Further, please identify the

Ascension subsidiary's ownership share in Regent Surgical Management and clarify the form of affiliate relationship this entity has with Regent Surgical Health.

See Ascension supplemental corporate organization chart dated as of February 2026 attached hereto as **Confidential Exhibit P**.

3. In light of the new information provided in the December 19 Response, entities must update and resubmit the previously submitted pre- and post- organizational charts to reflect:

a. Ascension's noted relationship with TowerBrook via the joint investment vehicle "Ascension TowerBrook Healthcare Opportunities, L.P.," as well as Ascension's ownership interest in Regent Surgical Health via the joint investment vehicle. Please also include the requisite percentage of interest Ascension holds in Regent Surgical Health.

See Ascension supplemental corporate organization chart dated as of February 2026 attached hereto as **Confidential Exhibit P**.

b. The Ascension subsidiary that co-owns Regent Surgical Management, the Regent Surgical Management legal entity, and the co-owner Regent affiliate's relationship to Regent Surgical Health.

See Ascension supplemental corporate organization chart dated as of February 2026 attached hereto as **Confidential Exhibit P**.

4. In the December 19 Response, RFI #1(b), Ascension stated it is "bound by contractual confidentiality obligations preventing the disclosure of any applicable agreement." ORS 415.501(13) prohibits entities from refusing to provide documents on the basis of confidentiality and requires that OHA maintain the confidentiality of all confidential information and documents that are not publicly available that are obtained in relation to a material change transaction. The requested agreements must be produced in order for OHA to continue its review of the proposed transaction.

See the agreements attached hereto as **Confidential Exhibit Q - V**.

Specifically, Ascension has provided the following agreements listed in the Confidential Appendix.

5. In the December 19 Response, RFI #1(c), Ascension stated it is "bound by contractual confidentiality obligations preventing the disclosure of the Management Affiliation Agreement dated March 2, 2021." ORS 415.501(13) prohibits entities from refusing to provide documents on the basis of confidentiality and requires that OHA maintain the confidentiality of all confidential information and documents that are not publicly available that are obtained in relation to a material change transaction. The requested agreement must be produced in order for OHA to continue its review of the proposed transaction.

Ascension is bound by contractual confidentiality obligations preventing the disclosure of any applicable agreement without prior consent. For additional information, see the Confidential Appendix.

6. In the December 19 Response, RFI #1(e), Ascension states that “[s]olely based on Regent’s website, Regent has two ASCs in Oregon.” Please clarify the following:

a. Confirm whether there are ASCs that Regent manages or owns in Oregon that are not listed on Regent’s website. As Ascension has a minority interest in Regent Surgical Health and is a co-owner of Regent Surgical Management, this information should be confirmed independent of reference to a public source.

Regent has confirmed that Plaza Ambulatory Surgery Center and Oregon Surgical Institute are the only ASCs that Regent owns and/or manages in Oregon. Ascension is not affiliated with these two centers and none of the Ascension-Regent ASCs are located in or operate in Oregon.

b. Confirm whether the two Oregon ASCs listed on Regent’s website (Plaza Ambulatory Surgery Center and Oregon Surgical Institute) are owned by Regent Surgical Health or managed by Regent Surgical Management.

Regent has confirmed that Plaza Ambulatory Surgery Center and Oregon Surgical Institute are owned by Regent Surgical Health, L.L.C. and managed by Regent Surgical Management, LLC.

7. In the December 19 Response, RFI #6, Ascension named three ASCs that “closed due to poor performance.” For each of the three ASCs, please describe how this “poor performance” was measured and what efforts Ascension undertook, if any, to keep them open. Further, please address the following clarifications:

Ascension made the decision to close Ascension Saint Thomas Lebanon Surgery Center as it was struggling financially and no longer financially viable due to low procedural volumes despite recruitment efforts and capital investment.

Ascension in partnership with the physician investors made the decision to close SurgCenter of Battle Creek Endoscopy & Surgery Center as it was struggling financially and no longer financially viable due to decreased volumes primarily driven by a number of physician partner retirements, despite recruitment efforts and capital investment.

Ascension in partnership with the physician investors made the decision to close Orthopedic Associates of Central Texas as it was struggling financially and no longer financially viable despite recruitment and economic efforts.

a. There appears to be an existing Saint Thomas Lebanon Surgery Center that is currently open. Please clarify the relationship between this center and the ASC that which closed in 2021.

Ascension confirms that Saint Thomas Lebanon Surgery Center is closed despite the fact that the website is still active.

b. There also appear to be several locations of Orthopedics of Central Texas associated with Ascension. Please clarify the relationship between these ASCs and the one that was noted to be closed.

Ascension confirms that the Orthopedics of Central Texas center is closed and that it does not operate other ASCs under that name. The website may not be up to date.

Sincerely,

A handwritten signature in black ink that reads "Jared P. Nagley". The signature is written in a cursive style with a large initial 'J' and a long, sweeping underline.

Jared P. Nagley
SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

Attachments

cc: Elaine Naughton (Bass, Berry & Sims, PLC)
Danielle Sloane (Bass, Berry & Sims, PLC)
Tim Hatfield (Hatfield Knivila LLC)