

ACTION / TIMELINE SCENARIO	MILESTONE DAY (FOLLOWING SUBMISSION OF NOTICE TO OHCA ON DAY 0) (DATES ARE NOT TO SCALE)												
	DAY 45	DAY 60	DAY 70	DAY 80	DAY 90	DAY 150	DAY 160	DAY 170	DAY 175	DAY 180	DAY 195	DAY 235	DAY 255
Scenario 1: The Office of Health Care Affordability (OHCA) elects to <i>not</i> conduct a cost and market impact review (CMIR)	Day 45: OHCA must provide notice if it determines that it will <i>not</i> conduct a CMIR and if so, the transaction may close 90 days following the notice												
Scenario 2: OHCA determines that a CMIR is required		<ul style="list-style-type: none"> » Day 60: OHCA must provide notice if it determines that it will conduct a CMIR » OHCA is required to complete the CMIR within 90 days of its final decision to conduct a CMIR » Upon completion of a CMIR, OHCA shall make factual findings and issue a preliminary report of its findings 						Day 160: Due date for written comments on the preliminary report		Day 175: Due date for OHCA's issuance of a final report			Day 235: An agreement shall not be implemented until 60 days after the issuance of a final report
Scenario 2.A: Submitters appeal OHCA's initial determination to conduct a CMIR		Day 70: Due date for submitters' appeal of OHCA's initial determination to conduct a CMIR	<ul style="list-style-type: none"> » Day 80: Due date for OHCA's final determination regarding submitters' appeal of the conduct of the CMIR » OHCA is required to complete the CMIR within 90 days of its final decision to conduct a CMIR » Upon completion of a CMIR, OHCA shall make factual findings and issue a preliminary report of its findings 							Day 180: Due date for written comments on the preliminary report	Day 195: Due date for OHCA's issuance of a final report		Day 255: An agreement shall not be implemented until 60 days after the issuance of a final report

Limitations/Assumptions

The representative timelines are subject to tolling and/or other adjustments, including with respect to the following:

- » OHCA must be notified within five business days if the transaction is amended or canceled, and OHCA may restart the notice period if there is a material change in the scope of the transaction.
- » OHCA may toll the notice period based upon agreement with the parties or while (i) OHCA is waiting on information from the parties or (ii) the transaction is under review by other regulatory agencies.
- » OHCA may extend the 90-day CMIR period for one additional 30-day period if it needs time to complete its review.
- » OHCA may extend the date of the issuance of the final report for “good cause.”
- » OHCA may authorize an expedited review process upon a demonstration that the failure to promptly close the transaction (i) will eliminate continued access to health care services and result in “severe financial distress” in the form of immediate business failure and bankruptcy for a party or (ii) result in a significant reduction in the provision of critical health services in a geographic region.