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**DELIVERED ELECTRONICALLY**

April 21, 2020

Vlasta Hakes  
Grifols  
1717 Pennsylvania Ave., NW  
Suite 250  
Washington, DC 20006-4605

**RE: Docket No. GMCB-003-20con, Proposed Development of Plasma Donation Center in Burlington, VT.**

Dear Ms. Hakes:

Thank you for your April 17, 2020 letter requesting a jurisdictional determination regarding Grifols' development of a plasma donation center at 555-595 Shelburne Road in Burlington, VT.

As noted in your letter, Grifols operates 252 plasma donor centers in 38 states and the one proposed for Burlington would be Grifols' newest Biomat USA plasma donor center. Your letter further noted that plasma, the liquid portion of blood, donated at Biomat plasma donor centers is then used by Grifols to produce life-saving medicines that treat people with rare and chronic conditions. Every donation is important because it takes anywhere from 130 to 1200 donations to treat just one patient for one year.

As proposed, the center is not offering diagnosis, treatment, patient or ambulatory care to two or more unrelated individuals and therefore does not meet the definition of a "health care facility" as defined in 18 V.S.A. § 9432(8). A certificate of need is therefore not required for the project.

If there are any changes in the project as proposed, please notify the Board immediately so we may determine whether further review is required.

Sincerely,

s/ Donna Jerry  
Donna Jerry  
Senior Health Policy Analyst

cc. Michael Barber, General Counsel

