

**Green Mountain Care Board**

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**DELIVERED ELECTRONICALLY**

August 29, 2018

Mr. Robert Hersey  
Northeastern Vermont Regional Hospital  
1315 Hospital Drive  
St. Johnsbury, VT 05819

**RE: Docket No. GMCB-025-18con, Purchase of Northern Physical Therapy in Lyndonville**

Dear Mr. Hersey:

Thank you for your letter received on August 27, 2018 regarding the potential acquisition of the assets and operations of Northern Physical Therapy, P.C. (NPT).

According to your letter, NPT is an outpatient physical therapy practice located at 569 Main Street in Lyndonville, which NVRH would operate under the hospital's license. Although the acquisition price has not been determined, it is anticipated that the potential acquisition will not exceed any of the monetary thresholds that would trigger certificate of need (CON) review including capital costs, equipment costs, or annual operating expenses in Year 1, 2 or 3 following acquisition. The practice is an existing facility that does not offer any mobile or fixed imaging services and NVRH does not plan to add any such equipment to the practice in Years 1-3 after the potential acquisition is completed.

Based on the representations in your letter, the facility is not subject to CON review under 18 V.S.A. § 9435(a), which excludes

offices of physicians, dentists, or other practitioners of the healing arts, meaning the physical places that are occupied by such providers on a regular basis in which such providers perform the range of diagnostic and treatment services usually performed by such providers on an outpatient basis.

If there are changes in the potential transaction or if, in the future, you intend to expand the services offered at the facility or intend to purchase a single piece of therapeutic or diagnostic equipment of significant value, please contact the Board so we may determine whether such services are subject to CON review. I suggest that you also contact Pat Jones, Director of Health System Finances, if the acquisition is set to occur and impacts your hospital budget.



If you have any questions, please do not hesitate to contact me at (802) 828-2918.

Sincerely,

s/ Donna Jerry

Senior Health Policy Analyst  
Green Mountain Care Board

cc: Pat Jones, Director of Health System Finances  
Kevin Mullin, Chair

