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DELIVERED ELECTRONICALLY

April 12, 2021

Donna Jerry
Senior Health Policy Analyst
Green Mountain Care Board
144 State Street
Montpelier, VT 05602

RE: Docket No. GMCB-004-21con, Proposed Renovations to Pine Heights at Brattleboro Center for Nursing and Rehabilitation

Dear Ms. Jerry:

This firm EP Brattleboro Acquisition, LLC and Brattleboro Crossings, LLC (collectively, the "Applicant"), on whose behalf we are submitting under separate cover an application for a certificate of need for a proposed renovation project for Pine Heights at Brattleboro Center for Nursing and Rehabilitation (the "Application"). In connection with that filing, the Applicant hereby requests expedited review of the Application by the Green Mountain Care Board (the "Board") pursuant to 18 V.S.A. § 9440(c)(5) and Green Mountain Care Board Rule 4.000, Certificate of Need, Section 4.304.

Under Rule 4.304(1)(a), "an applicant seeking expedited review of an application must show, and the Board must determine, that [] the application is likely to be uncontested and the proposed project does not substantially alter services."

The proposed application consists of the renovation of three nursing floors at Pine Heights at Brattleboro Center for Nursing and Rehabilitation by the current owners/operators. The Applicant does not anticipate that the Application will be contested. The Application does not raise significant health care policy or planning concerns under Rule 4.304(2)(a). Moreover, in accordance with Rule 4.304(2)(b)(1), the expenditures associated with the proposed project will not have any negative impact on the services provided, the cost of health care, or the financial strength of the Applicant.

The Applicant has shared the details of the proposed project with the Staff Attorney for the Office of the Vermont's Health Care Advocate, who conveyed that, based on the materials reviewed (a draft of the Application, with the only differences being non-substantive), the Office of the Health Care Advocate does not have any plans to intervene in this CON process. The Applicant has likewise shared the details of the proposed project with Vermont's Long Term Care Ombudsman, who conveyed that, based on the materials reviewed and the Applicant's answers to their questions, the Vermont

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Ombudsman Program does not have any objections to the project or the facility's desire to proceed on an expedited basis.

Based on the foregoing, the Applicant respectfully requests that the Board grant expedited review for its CON application, under 18 V.S.A. § 9440(c)(5) and Green Mountain Care Board Rule 4.000, Certificate of Need, Section 4.304.

Thank you for your consideration.

Sincerely yours,

/s/ Shireen T. Hart

Shireen T. Hart