



Vernon Advent Christian Home

Request for Expedited Review

RE: Docket No. GMCB-001-22con, Replacement of Vernon
Green Skilled Nursing

September 6, 2023

Verification Under Oath

STATE OF VERMONT
GREEN MOUNTAIN CARE BOARD

In re: Vernon Green Nursing Home)
 Vernon, VT
 Owned and Operated by) Docket No. GMCB-001-22con
 Vernon Advent Christian Home, Inc)
 Vernon, VT

Verification Under Oath to file with Certificate of Need Application, correspondence and additional information subsequent to filing an Application.

M. Bradford Ellis, being duly sworn, states on oath as follows:

1. My name is M. Bradford Ellis. I am the Executive Director of Vernon Advent Christian Home, Inc. I have reviewed the **Request for Expedited Review RE: Docket No. GMCB-001-22con, Replacement of Vernon Green Skilled Nursing Facility.**
2. Based on my personal knowledge and after diligent inquiry, I attest that the information contained in **Request for Expedited Review RE: Docket No. GMCB-001-22con, Replacement of Vernon Green Skilled Nursing Facility** is true, accurate and complete, does not contain any untrue statement of a material fact, and does not omit to state a material fact.
3. My personal knowledge of the truth, accuracy and completeness of the information contained in the **Request for Expedited Review RE: Docket No. GMCB-001-22con, Replacement of Vernon Green Skilled Nursing Facility** is based upon either my actual knowledge of the subject information or upon information reasonably believed by me to be true and reliable and provided to me by the individuals identified below in paragraph 4. Each of these individuals has also certified that the information they have provided is true, accurate and complete, does not contain any untrue statement of a material fact and does not omit to state a material fact.
4. The following individuals have provided information or documents to me in connection with the **Request for Expedited Review RE: Docket No. GMCB-001-22con, Replacement of Vernon Green Skilled Nursing Facility** and each individual has certified, based either upon his or her actual knowledge of the subject information or, where specifically identified in such certification, based on information reasonably believed by the individual to be reliable, that the information or documents provided are true, accurate and complete, do not contain any untrue statement of a material fact, and do not omit to state a material fact:
 - (a) M. Bradford Ellis, Executive Director, Vernon Advent Christian Home, Inc.
 Vernon, VT – Request for Expedited Review
 - (b) Shannon Lenzini, Attorney, Downs Rachlin Martin, St Johnsbury VT – Legal
 counsel for Certificate of Need Application and Request for Expedited Review

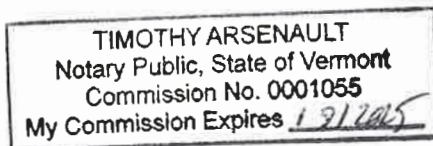
5. In the event that the information contained in the **Request for Expedited Review RE: Docket No. GMCB-001-22con, Replacement of Vernon Green Skilled Nursing Facility** becomes untrue, inaccurate or incomplete in any material respect, I acknowledge my obligation to notify the Green Mountain Care Board and to supplement the **Request for Expedited Review RE: Docket No. GMCB-001-22con, Replacement of Vernon Green Skilled Nursing Facility** as soon as I know, or reasonably should know, that the information or document has become untrue, inaccurate or incomplete in any material respect.

M. Bradford Ellis

M. Bradford Ellis
Executive Director
Vernon Advent Christian Home, Inc.

On 9/6/2023, M. Bradford Ellis appeared before me and swore to the truth, accuracy and completeness of the foregoing.

Timothy Arsenault
Notary public
My commission expires
[seal]





VERNON HOMES

A COMMUNITY OF CARING. SEASONED WITH GRACE.



100 Years of Caring:
Our Legacy of Grace Continues....

DELIVERED ELECTRONICALLY

September 6, 2023

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

Re: Docket No. GMCB-001-22con: Vernon Green Nursing Home Replacement; Request for Expedited Review

Dear Ms. Jerry,

On December 28, 2022, Vernon Advent Christian Home, Inc. d/b/a Vernon Green Nursing Home (the “Applicant” or “Vernon Green”) submitted a Certificate of Need (“CON”) application to the Green Mountain Care Board (the “Board”), which application included a request for expedited review.

On January 26, 2023, the Board denied the expedited review request on the grounds that the CON application was missing certain financial information. The Board invited the Applicant to resubmit its request for expedited review once all required financial information had been submitted to the Board.

The Applicant has now submitted all requested financial information and the Board closed the Applicant’s CON application on August 28, 2023. Now that the Applicant has provided all requested financial information and no individuals or entities have filed a petition for interested party or amicus curiae status during the five (5) business days following the Board’s closure of the CON application, the Applicant respectfully resubmits its request for expedited review of its Certificate of Need application.

A request for expedited review may be granted if the project is (a) likely to be uncontested, and (b) does not substantially alter services. 18 V.S.A. § 9440(c)(5); GMCB Certificate of Need Rule 4.304 (“Rule 4.304”). A project does not “substantially alter services” if:

- (a) the project raises no significant health care policy or planning concerns; and
- (b) the expenditures associated with the proposed project do not have a significant impact on the services provided, the cost of health care, or the financial strength of the applicant.

Rule 4.304

This project involves replacing the existing Vernon Green facility with a newly constructed three-story building situated adjacent to the existing facility. The project will replace, but not add to, Vernon Green’s pre-existing

Vernon Green - Skilled Nursing Home
61 Greenway Drive
P: 802-254-6041 | F: 802-257-5362

Vernon Hall - Assisted Living
13 Greenway Drive
P: 802-254-8091 | F: 802-254-5345

Vernon Birches - Independent Apartments
61 Greenway Drive
T: 802-254-6041 | F: 802-257-5362

licensed bed capacity and will follow the Green House Model (described in detail in the application) which replicates a home environment while delivering “person-directed” living for residents.

The project will replace an existing skilled nursing facility with a small-house model skilled nursing facility allowing the Applicant to deliver the same services, albeit in a different way, as currently provided. As such, the project is not expected to raise any significant health care policy or planning concerns and is, moreover, aligned with the policies of 18 V.S.A. § 9431(a) because it will not lead to unnecessary duplication of services and will result in improved quality of health care services.

As described in detail in the application, the expenditures associated with the project are necessary to construct a new facility to replace the existing aged facility. The project will result in a facility that improves resident and employee satisfaction and care outcomes, and importantly, will enable the Applicant to deliver long-term care services in a manner that better caters to resident needs and personal preferences. Additionally, the project will improve the Applicant's financial condition by, among other things, leading to higher occupancy levels and optimizing management and operating cost efficiencies. Further, while the rates associated with the various payors are projected to increase, such increases are expected to make certain rates more aligned with competitive market rates.

Finally, because the application is now closed and no competing application has been filed and no parties have timely sought interested party status, the application is uncontested. For all the reasons described in this letter, the application can be reviewed appropriately in an abbreviated process.

Thank you for your assistance and consideration of this request for expedited review.

Sincerely,

A handwritten signature in cursive script that reads "Brad Ellis".

M. Bradford Ellis
Executive Director