

PRIMMER

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January 25, 2017

Donna Jerry
Senior Health Policy Analyst
Green Mountain Care Board
89 Main Street, City Center
Montpelier, VT 05620

Re: Green Mountain Surgery Center, GMCB-010-15con

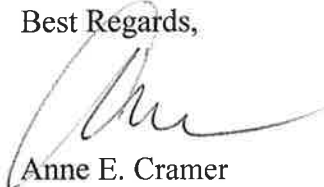
Dear Donna:

This letter is written to advise the Green Mountain Care Board (the "Board") that our clients, the Vermont Association of Hospitals and Health Systems ("VAHHS") and Northwestern Medical Center ("NMC"), as interested parties to the Green Mountain Surgery Center ("GMSC" or the "Applicant") Certificate of Need ("CON") application will need appropriate time, no less than thirty days, to review any responses filed by the Applicant to the Board's outstanding questions prior to the application being ruled complete.

Our understanding of the CON regulations is that the interested parties may not file any new information regarding a CON application after the application is ruled complete (i.e., the "application closed date"). GMCB CON Rule 4.407(2). VAHHS and NMC intend to file materials containing new information with the Board before the GMSC's CON application closed date. However, VAHHS and NMC will need time to review what is expected to be extensive new information contained in the Applicant's filings in response to the outstanding questions, and to incorporate responses to the filings in the materials they plan to submit to the Board. We request that the Board confirm that interested parties will be provided no less than thirty days following the Applicant's response to outstanding questions to submit information before the GMSC Application is ruled complete.

Thank you for your consideration.

Best Regards,



Anne E. Cramer

cc: Noel Hudson, Esq., Director of Health Policy, Green Mountain Care Board (via e-mail)
Judy Henkin, Esq., General Counsel, Green Mountain Care Board (via e-mail)
Eileen Elliot, Esq., Dunkiel Saunders, Elliot, Raubvogel & Hand (via e-mail)
Jeffrey Tieman, President and CEO, VAHHS (via e-mail)

Jill Berry Bowen, CEO, NMC (via e-mail)
Lila Richardson, Esq., Office of Healthcare Advocate (via e-mail)