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July 15, 2016

VIA US MAIL and EMAIL
Donna Jerry
Senior Health Policy Analyst
Green Mountain Care Board
89 Main Street
Montpelier, VT 05620

Re: Docket No. GMCB-020-15con, Proposed Purchase of Rowan Court Health and
Rehabilitation Center in Barre, VT

Dear Ms. Jerry:

I enclose one original and two hard copies of Applicants' Responses to Green Mountain Care Board Requests Dated July 1, 2016, for submission and review by the Green Mountain Care Board. Please feel free to contact me with any questions or comments.

Thank you.

Very truly yours,



Shireen T. Hart, Esq.

Encls.

**STATE OF VERMONT
GREEN MOUNTAIN CARE BOARD**

**IN RE: APPLICATION OF)
BARRE GARDENS HOLDINGS LLC AND)
BARRE GARDENS NURSING AND REHAB LLC)**

GMCB 020-15con

**APPLICANTS' RESPONSES TO GREEN MOUNTAIN CARE BOARD
REQUESTS DATED JULY 1, 2016**

1. **Using a table format, provide for each of the 31 facilities owned by the applicants, the CMS star rating for all rated periods, beginning with the date of purchase by the applicants and ending with the most recent period, for the following:**
 - a) overall star rating
 - b) staffing
 - c) rn staffing

Response:

Please see attached Tables. Please note that there are thirty (30) facilities. Data for Holliswood was previously provided in the application narrative as Messrs. Glatzer and Gamzeh had recently served as the LNHA, but the Applicants submit that its current rating are not relevant at this point.

- 1.a. Overall star rating
- 1.b. Staffing
- 1.c. RN staffing

2. **Update the response to the first set of questions, Request No. 1b on page 3 (quality scores below the state average), with the most recent period of CMS information for the 31 facilities owned by the Applicants and resubmit.**

Response:

See next page.

The following homes shaded with light gray are Priority Healthcare Group homes.

Facility	Moderate to severe pain (lower = better)	Pressure ulcers worsened (lower = better)	Seasonal flu vaccine (higher = better)	Pneumococcal vaccine (higher = better)	Received antipsychotic medication (lower = better)	Falls with major injury (lower = better)	Urinary tract infection (lower = better)	Self-report moderate to severe pain (lower = better)	Have pressure ulcers (lower = better)	Lose control of bowels/bladder (lower = better)	Catheter inserted/left in bladder (lower = better)	Physically restrained (lower = better)	Need for help with daily activities increased (lower = better)	Lost too much weight (lower = better)	Depressive symptoms (lower = better)	Seasonal flu vaccine (higher = better)	Pneumococcal vaccine (higher = better)	Received antipsychotic medication (lower = better)
Rowan Court Birch Manor ¹	+7.5 +6.5	+0.1 +1.9	-41 12.4	-48 16.7	+1.2	+1.2	+8.7	+5.2	+1.6	+1.2	+1.2	+8.7	+1.2	+8.7	+36.6	-5.4	-15.7	+3.3 +3.5
Brighton	+6.6	+5	-	-	+9	+9	+4.7	+2.0	+2.0			+3.0	+2.8	+3.0	+15.1	-1.5	-19	+9
Burlington Cambridge	+12.8	+3	-62 -22 52.5	-54	+7	+2.6	+18.4	+1.8	+2.6	+2.1	+3.4	+2.4			+14.3	-5	-9	+21.8 +5.8
Centennial Gardens	+8.8		-	-	+2.4	+7.7							+3.2			-4.5	-7.7	+6.9
Claiborne & Hughes		+1	11.5 17.6	19.2	+2	+3.4			+3.4				+5.2	+3.4		-1.6		+3.3
Colonial Manor	+9.4			-	+9	+1.0	+4.8	+5								-1.4		+6
Delmar Eastview	+9.8	+1.1	-5.7	-	+1.6	+4.4	+2.1	+4.7		+5.6			+5.8	+1		-3.6		+8.7
Franklin Hamilton ²	+3		30.8		+2		+8.6						+3.0					+2
Health Ctr Galloway Highland Lebanon	N/A		N/A	+5.1						+2.1	+2.4	+1.4	+1.4	+2.1	+7.6			+29.5
Logan Manor Cure n/k/a Barclay's	+3.3		-	-	+0.1	+4.9	+0.6	+3.4		+1.9	+1.8	+2.7	+2.0	+1.0			-8.3	
Maple Ridge Neptune	+0.5 +0.3	+0.9	22.0 18.8	16.5	+1.0	+0.9	+1.8	+4.3					+1.1		+18.3		+36.0	
Logan Manor Cure n/k/a Barclay's	+1.0 +2.0	+0.7 +0.4	-	-					+3.2	+3.1	+0.2	+1.7		+1.2	+14.4			+2.7
Maple Ridge Neptune	+4.8 +18.8	+1.2	-7.2 -1.0	-	+0.4				+5.9	+29.2	+1.9	+0.5	+4.6	+6.4	+6.2	-6.8	-6.4	+16.9
North Ridge	+13.8	+0.4	56.7		+0.1							+1.2			+68.1		-0.1	+11.0
Pearl Valley	+12.5	+5.4	11.4 32.8	28.7 57.3	+2.5	+2.3	+0.1					+1.0	+5.4	+5.0	+30.6	-4.3	-11.9	+25.1
Pickerington Renaissance n/k/a Westfield	+1.7					+0.2	+1.5	+2.5	+3.2	+2.5	+0.8	+2.2	+14.5		+2.2		-34.4	+2.9
St. Francis Sheridan			65.0 -3.8	31.9 -0.4	+1.2	+0.6			+2.6	+3.2	+1.7		+3.0	+4.4		28.0	-5.9	-10.2
The Gardens at Cannon Falls ¹	+8.8	+0.2	15.6		+5.7	+4.7			+2.5	+6.4	+2.6		+4.4	+10.1	+1.5		-3.8	+18.1
Valley View Manor	+2.1	+4.6	-1.4		+2.4			+12.4		+11.5								
Villages of Orleans	+27.2	+0.4			+2.5	+1.4	+7.6	+1.7	+12.0				+4.1		+37.3	-2.6	-0.6	+4.6
Purchased in 2015	+21.9	+2.6	37.6 24.6	14.3	+0.1	+4.5	+5.9	-0.2	+12.5						+18.0	-3.3		+3.4
Waterbury Gardens ³	+4.2		44.0	87.3	+0.4			+6.2	+21.6			+2.7	+2.0			-4.4	+13.2	
Waters Edge			-3.0			+5.6	+6.8			+1.0	+0.8		+2.0		+54.5		+4.0	
Winchester					+1.7	+1.5				+0.5	+1.1	+0.2	+5.7	+11.0				+2.9

The CMS data is as of July 5-10, 2016.

1. Birch Manor, Centennial Gardens f/k/a Crystal Care, The Gardens at Cannon Falls and Waterbury Gardens were purchased by Priority in March, 2016.
2. Hamilton and Waterbury Gardens have behavior management programs, so the use of antipsychotics at those facilities would potentially be higher than the state average.
3. The most recent annual survey for Waterbury Gardens showed extensive improvements under Priority's ownership (and Shalom Lerner's leadership since October 2015) in the number of deficiencies cited (from 16 down to 6) and the scope and severity of the deficiencies (0 at harm or substandard levels). Falls have decreased from 24 to 16, for a current rate of 13% compared to 43% nationally. The facility is now restraint free. Medicare A rehospitalizations for less than 30 days average for the year is 3.78%, compared to the national average of 17%.

3. Provide the dates of purchase for Birch Manor, Centennial Gardens, The Gardens at [Cannon Falls], Waterbury Gardens.

Response:

New facilities	Purchase date
Birch Gardens	March 1, 2016
Centennial Gardens f/k/a Crystal Care	March 1, 2016
The Gardens at Cannon Falls	March 1, 2016
Waterbury Gardens	March 17, 2016

4. Provide a revised matrix (previously sent in response to Request 15, second set of questions) that includes the four facilities recently purchased and omitted information regarding the Cambridge facility.

Response:

Facility	Provider entity for mental health services	On-site or tele-health	Provider entity for psychiatry services	On-site or tele-health
Birch Manor Brighton	New England Geriatrics Employed/contracted mental health service providers	On site On site	New England Geriatrics Dr. Vassilenko Dr. Kwiat – as needed	On site On site
Burlington Cambridge	Dr. F. Elmudesi Team of psychologists and NPs	On site On site	Dr. Bugarino Dr. Rangwani and NP	On site On site
Centennial Gardens	Associated Psychological Services	On site	Dr. Brose	On site
Claiborne Colonial	Vericare North Central Health Services	Teleservice Off site	IPC Dr. Green	Teleservice Off site
Delmar	Vista Medical.	On site	Vista works with offsite psychiatrist. When needed, residents are referred to psychiatric facility for care.	Off site
Eastview	Dr. Dennison with Aspiras, General Clinic	On site	Dr. Dennison with Aspiras, General Clinic	On site
Franklin	Counseling Source Dr. Feidenburg, a neurobehavioralist, also provides services.	On site	Dr. Rangwani	On site
Hamilton	VA – B. Chirumamilla Senior Wellness – Pat Barzinsky	On site	VA – B. Chirumamilla Senior Wellness – Pat Barzinsky	On site
Galloway	CHE Behavioral Health Services	On site	Dr. Mazor	On site
Highland	CHE Behavioral Health Services	On site	Independent provider	On site
Holliswood	CHE Behavioral Health Services	On site	Dr. Trachtenberg	On site

Facility	Provider entity for mental health services	On-site or tele-health	Provider entity for psychiatry services	On-site or tele-health
Lebanon	Counseling Source	On site	Dr. Kaneria	On site
Logan	Counseling Source Kathryn Redding	On site	Referred out	Off site
Manor Care Maple Ridge	Senior Care Therapy They use a variety of mental health providers selected by the individual residents. For example, Bellin Health Care Systems (BHS) or Aurora Health Services	On site Off site	Dr. Debbie Klanzky Selected by the individual residents.	On site Off site
Neptune	CHE Behavioral Health Services	On site	Dr. Prada	On site
North Ridge	Tamarack Behavioral Center	Off site	Dr. Mantelbaum with	Off site
Pearl Valley	Behavioral health visits to the University of Iowa	Off site	Hillcrest Family Services or Psychiatric NP comes on site	Off site On site
Pickerington	Counseling Source	On Site	Dr. Rangwani	On Site
Renaissance	New England Geriatrics	On site	New England Geriatrics	On site
St. Francis	CHE Behavioral Health Services	On site	Amherst Psychiatry	On Site
Sheridan	CHE Behavioral Health Solutions	On site	CHE Behavioral Health Solutions	On site
The Gardens at Cannon Falls Valley	Associated Psychological Services CHE Behavioral Health Services	On site On site	Dr. Brose No in-house psychiatry. The residents who see a psychiatrist go to specialty clinics. Most of those residents were admitted with an established psych provider.	On site Off site.
Villages of Orleans	Employed/contracted mental health service providers	On site	Dr. Vicki Weinstein	On Site
Waterbury Gardens	Lori Clark, Med Options	On Site	Dr. Sudhakar Shetty, Nancy Carlson APRN Shoreline Psychiatry	On Site
Waters Edge	Behavior Solutions Psychologist – Jill Peterson	On site	Behavior Solutions Psychiatrist – Heather Hutchison	On site
Winchester	Psycho Therapies	On site	None When needed, residents are referred to psychiatric facility for care.	Off site.

5. **Provide in a table format a list of all skilled nursing facilities where Mr. Lerner served as Administrator of Record and the monthly CMS overall star ratings at each facility during the period of his service.**

Response:

University Nursing Home	November 2012 – January 2014
Bushwick Center for Rehab and Healthcare	January 2014 – January 2015
Alpine Home Health Care (not skilled nursing facility)	January 2015 – August 2015
Waterbury Gardens	October 2015 – present

Please see the attached table, 5, setting forth the monthly CMS overall star ratings at each facility during the period of Mr. Lerner's service.

6. **Provide the breakdown of hours/days per week, for the first year after purchase, that Mr. Glatzer and Mr. Gamzeh will spend working onsite at Rowan Court, and the amount of hours devoted to Priority Healthcare. In addition, provide the hours/days per week for the first year after purchase that Mr. Lerner will spend working onsite at Rowan Court. Explain the activities that Glatzer, Gamzeh and Lerner will each be responsible for relative to Rowan Court.**

Response:

Messrs. Glatzer and Gamzeh are each expected to spend approximately eight (8) hours per week at the facility, for a total of sixteen (16) hours per week, while they transition ownership. However, it is possible that the current owners and the Applicants will have entered into a management agreement before any change in ownership, such that the need for Messrs. Gamzeh and Glatzer to be on site following the change in ownership is difficult to quantify.

In addition, Shalom Lerner will be on site at least eight (8) hours per week. He currently is the Administrator at Waterbury, but it is anticipated that he will transition out of that position and focus on Rowan Court specifically and the New England Region for Priority's facilities generally. In addition, Priority will have a Regional Clinical Director and Vice President of Clinical Services who will be working at the facility as needed. Over time, as the facility improves and quality measures are consistently above average, the assignment of Priority individuals to the facility will evolve. What that will look like will depend upon what the facility and its residents need. The Applicants have no plans or tolerance to run a below average facility.

Mr. Glatzer will focus on admissions and marketing initiatives as well as reimbursement. Mr. Gamzeh will focus on labor management and relations, as well as overseeing clinical strategies. Mr. Lerner will oversee day-to-day operations and will work directly with the facility's Licensed Nursing Home Administrator.

7. Provide additional detail about each of the facilities owned or managed by Priority Healthcare, including the services provided at each. Explain in detail the applicants' plan to manage and maintain Priority Healthcare, other facilities where they have an interest, and also operate Rowan Court, which is designated as a Special Focus Facility.

Response:

Here are the services provided at each Priority Healthcare Group facility:

	Short Term Rehab	Long Term Care	Respite Care	Comfort Care	Skilled Nursing Care	Tracheotomy Care	TPN	IV Antibiotic Therapy	MIST Therapy	Wound Care	Cardiac Therapy	Peritoneal Dialysis	Stroke Recovery	Behavior Management	Ventilator Care	Respiratory Therapy
Birch Gardens	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>			<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>			
Centennial Gardens	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>			<input checked="" type="checkbox"/>			
Hamilton Nursing Home	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		
Neptune Gardens	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			
The Gardens at Cannon Falls	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>			<input checked="" type="checkbox"/>			
Waterbury Gardens	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Westfield Gardens	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>			

As stated above, Messrs. Glatzer, Gamzeh and Lerner will each be spending at least eight (8) hours per week at the facility at the outset, for a total of at least twenty-four (24) hours per week among them. These hours will change as needed. In other words, if eight (8) hours per week is not adequate, then they will add more hours. Likewise, Messrs. Glatzer and Gamzeh would expect over time that there is no longer a need for each to be on site eight (8) hours weekly. That, of course, will depend on how long it takes to improve the areas they identify upon change in ownership. Certainly, as a Special Focus Facility, it currently appears as though Rowan Court will demand more of their attention.

Even when Messrs. Glatzer and Gamzeh are spending at least one day per week in Vermont, that still leaves them with ample time to devote to Priority Healthcare Group's other facilities. Likewise, they have others in the organizations who help the facilities.

8. Explain whether Mr. Lerner will need to secure a Vermont nursing home administrator's license and if so, the length of time needed to complete the Vermont licensing requirements.

Response:

No, Mr. Lerner will not be serving as a Licensed Nursing Home Administrator. The Applicants' plan is to maintain the current Administrator in place.

9. Have the equity contributions of each of the buyers changed as a result of the recent purchase of four additional facilities? If so, explain any changes.

Response:

No, the equity contributions of each of the individual buyers have not changed as a result of the recent purchase of four additional facilities.

Attachments	
Table 1.a.	The CMS star rating for all rated periods, beginning with the date of purchase by the applicants and ending with the most recent period, for the overall star rating , for each of the 30 facilities owned by the Applicants.
Table 1.b.	The CMS star rating for all rated periods, beginning with the date of purchase by the applicants and ending with the most recent period, for the staffing rating , for each of the 30 facilities owned by the Applicants.
Table 1.c.	The CMS star rating for all rated periods, beginning with the date of purchase by the applicants and ending with the most recent period, for rn staffing rating , for each of the 30 facilities owned by the Applicants.
Table 5.	The monthly CMS overall star ratings at each facility during the period of Mr. Lerner's service.

Request 1.a. Overall Star Rating

[illegible]

Request 1.b. Overall Staffing Rating

[illegible]

Request 1.c. Overall RN Staffing Rating

[illegible]

Request No. 5

Overall Star Rating for Shalom Lerner's LNHA experience

Dates	University Nursing Home	Bushwick Center	Waterbury Gardens
Nov-12	3		
Dec-12	3		
Jan-13	5		
Feb-13	5		
Mar-13	5		
Apr-13	5		
May-13	5		
Jun-13	5		
Jul-13	5		
Aug-13	5		
Sep-13	5		
Oct-13	5		
Nov-13	3		
Dec-13	3		
Jan-14	5	4	
Feb-14		4	
Mar-14		4	
Apr-14		5	
May-14		5	
Jun-14		5	
Jul-14		5	
Aug-14		5	
Sep-14		5	
Oct-14		5	
Nov-14		5	
Dec-14		5	
Jan-15		5	
Feb-15			
Mar-15			
Apr-15			
May-15			
Jun-15			
Jul-15			
Aug-15			
Sep-15			
Oct-15			1
Nov-15			1
Dec-15			1
Jan-16			1
Feb-16			1
Mar-16			1
Apr-16			1
May-16			1
AVERAGES	4	5	1

**STATE OF VERMONT
GREEN MOUNTAIN CARE BOARD**

**IN RE: APPLICATION OF)
BARRE GARDENS HOLDINGS LLC AND)
BARRE GARDENS NURSING AND REHAB LLC)**

GMCB 020-15con

VERIFICATION UNDER OATH

David Gamzeh, being duly sworn, states on oath as follows:

1. My name is David Gamzeh. I am the managing member of Barre Gardens Holdings LLC and Barre Gardens Nursing and Rehab LLC (the “applicants”). I have reviewed the **APPLICANTS’ RESPONSES TO GREEN MOUNTAIN CARE BOARD REQUESTS DATED JULY 1, 2016** (the “Submission”).
2. Based on my personal knowledge and after diligent inquiry, I attest that the information contained in the Submission 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 Submission 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 Submission 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:

Ari Stawis
Akiva Glatzer
Ephram Mordy Lahasky
Shalom Lerner
5. In the event that the information contained in the Submission becomes untrue, inaccurate or incomplete in any material respect, I acknowledge my obligation to notify the Green Mountain Care Board and to supplement the Submission as soon as I know, or reasonably


should know, that the information or document has become untrue, inaccurate or incomplete in any material respect.

Dated this 12th day of ~~June~~ ^{July}, 2016.



David Gamzeh

On July 12th, 2016, David Gamzeh appeared before me and swore to the truth, accuracy and completeness of the foregoing.



Notary public

My commission expires: February 16, 2020

