

April 20, 2016

Ms. Donna Jerry
Senior Health Policy Analyst
State of Vermont, Green Mountain Care Board
89 Main Street
Montpelier, VT 05620-3101

Re: **Docket No. GMCB-005-15con, North Country Oncology Center** (Norris Cotton Cancer Center-North) in St. Johnsbury, Proposed Construction of a Second Vault to House a New Linear Accelerator and Maintenance of Existing Linear Accelerator to Provide Back-Up Service, Project Cost: \$4.8 million.

Dear Ms. Jerry:

Following our recent conversation and pursuant to the Green Mountain Care Board's Rule § 4.304, Mary Hitchcock Memorial Hospital, d/b/a North Country Oncology Center (Norris Cotton Cancer Center-North) in St. Johnsbury, VT respectfully requests expedited review of its above titled application for Certificate of Need from the State of Vermont. It is understood that this request will be considered after we have completed and returned the April 1 request for additional information and satisfactorily answered all outstanding questions posed by GMCB staff.

We believe that the above referenced application meets criteria (a) for expedited review outlined in § 4.304:

4.304 Expedited Review

1. An applicant seeking expedited review of an application must show, and the Board must determine, that:

(a) the application is likely to be uncontested and the proposed project does not substantially alter services

Public notice of this CON application appeared in the February 19 edition of the *Caledonia-Record* newspaper, and to our knowledge no competing applications have come forward. Additionally, in the approximately 10 years of providing cancer care services in the same location, no competitors have entered the market. As such we believe that it is very unlikely that the application will be contested. Furthermore, the proposed project does not raise any significant health care policy or planning concerns and is for the "routine replacement of existing equipment that is depreciated [and] out-of-date" (See Green Mountain Care Board Rule § 4.304(2)(a) and (b)(ii).) Therefore, this CON application does not substantially alter the services currently being offered.

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In the interest of moving onto the permitting and development stage of this proposed project as quickly as possible, we ask that the Green Mountain Care Board staff consider our request to proceed with expedited review of the above titled application at its earliest convenience. This proposed project addresses a vital health need in an area of Vermont that is medically underserved, especially for advanced cancer care services. The proposed project will ensure the most efficient and effective delivery of radiotherapy services to Vermont's Northeast Kingdom for many years to come.

Please let me know if there are any questions regarding this request.

Sincerely,

Jason E. Aldous

Jason E. Aldous
Director of Business Planning
Mary Hitchcock Memorial Hospital

JA/