November 24, 2017

Via Email dph.don@state.ma.us

Ms. Nora Mann, Esq.

Director, Determination of Need Program

Department of Public Health

250 Washington Street, 6th Floor

Boston, Massachusetts 02108

 Re: Determination of Need Application – Long Term Care Substantial Capital Expenditure

 Application Number NA-17112414-LE

Dear Ms. Mann:

Pursuant to 105 CMR 100.000 (“Regulations”) and Determination of Need Guidelines and Policy Advisories (“Guidelines”), and on behalf of SunBridge Healthcare, LLC, a subsidiary of Genesis Healthcare (“Applicant”), we are submitting the accompanying Application and related documents to support the request for a Determination of Need authorization. The Applicant, d/b/a of Merrimack Valley Center, requests approval to make a Substantial Capital Expenditure to construct 120 bed facility at 55 Loon Hill Road, Dracut, MA 01826. The Applicant proposes to activate two Beds Out of Service (“BOOS”) authorizations for a total of 191 licensed beds, to utilize 120 beds to operate Merrimack Valley Center and to relinquish the balance.

The Proposed Project will be unique in the Greater Lowell area as it will not be exclusively the traditional long term care or even short term care program model. Partnering with the University of Massachusetts Lowell Zuckerberg College of Health Sciences ("UMA") where Genesis holds a position on the College of Health Advisory Board and Lowell General Hospital/Circle Health on whose Board of Governors Genesis sits, the Applicant has developed a new and innovative 'hybrid' teaching skilled nursing center. The centerpiece of this hybrid skilled nursing model is that highly complex care will be provided in an educational environment. Program design is underway with a focus on interprofessional learning and high level skilled patient needs. UMA Lowell students in all health professions will serve a rotation through the center. Depending on the year of education and capabilities, a structured learning program and support system will be designed, to create experiences that support the care of the SNF patient of today and the future.

The clinically complex services provided at Merrimack Valley Center will be an extension of the Circle Health/LGH cardiac rehabilitation for those patients who are no longer in the acute phase of their program, but who continue to require skilled care and observation. With collaborative programmatic support from the hospital’s cardiac rehabilitation and cardiac management programs, the Applicant intends to build a distinctive skilled program to meet the needs of these patients

We believe that the Applicant has met the requirements of the Regulations and Guidelines and has proposed a unique project that addresses the Commonwealth’s goals of cost containment, improved public health outcomes and delivery system transformation. We believe this hybrid teaching skilled nursing facility can become a model for innovation and quality in healthcare.

Thank you for your consideration of this request. Please contact me should you have any questions or need further information.

Sincerely,

David A. Roush

Strategic Care Solutions, LLC

Enclosures

Cc: Alice Bonner, Executive Office of Elder Affairs

 Stephen Davis, Healthcare Facility Licensure & Certification

 Daniel Gent, Healthcare Facility Licensure & Certification

 Sherman Lohnes, Healthcare facility Licensure & Certification

 Patty McCusker, Center for Health information and Analysis

 Kate Mills, Health Policy Commission

 Paul Muzhuthett, Northeast Regional Health Office

 Thomas Lane, MassHealth

 Richard Blinn, Genesis Healthcare

 Wendy LaBate, Genesis Healthcare

 Barbara Wyser, Strategic Care Solutions