



NC DEPARTMENT OF  
**HEALTH AND  
HUMAN SERVICES**

ROY COOPER • Governor

MANDY COHEN, MD, MPH • Secretary

MARK PAYNE • Director, Division of Health Service Regulation

VIA EMAIL ONLY

June 24, 2021

Greg M. Gaylis  
[Greg.gaylis@agg.com](mailto:Greg.gaylis@agg.com)

**No Review**

**Record #:** 3599  
**Date of Request:** June 14, 2021  
**Facility Name:** See Attachment A  
**FID #:** See Attachment A  
**Business Name:** See Attachment A  
**Business #:** See Attachment A  
**Project Description:** Corporate restructure  
**County:** See Attachment A

Dear Mr. Gaylis:

The Healthcare Planning and Certificate of Need Section, Division of Health Service Regulation (Agency) received your correspondence regarding the project described above. Based on the CON law **in effect on the date of this response to your request**, the project as described is not governed by, and therefore, does not currently require a certificate of need. If the CON law is subsequently amended such that the above referenced proposal would require a certificate of need, this determination does not authorize you to proceed to develop the above referenced proposal when the new law becomes effective.

This determination is binding only for the facts represented in your correspondence. If changes are made in the project or in the facts provided in the correspondence referenced above, a new determination as to whether a certificate of need is required would need to be made by this office.

Please do not hesitate to contact this office if you have any questions.

Sincerely,

Tanya M. Saporito  
Project Analyst

for  
Lisa Pittman  
Assistant Chief, Certificate of Need

cc: Adult Care Licensure Section, DHSR

NC DEPARTMENT OF HEALTH AND HUMAN SERVICES • DIVISION OF HEALTH SERVICE REGULATION

HEALTHCARE PLANNING AND CERTIFICATE OF NEED SECTION

LOCATION: 809 Ruggles Drive, Edgerton Building, Raleigh, NC 27603  
MAILING ADDRESS: 809 Ruggles Drive, 2704 Mail Service Center, Raleigh, NC 27699-2704  
<https://info.ncdhhs.gov/dhsr/> • TEL: 919-855-3873

AN EQUAL OPPORTUNITY / AFFIRMATIVE ACTION EMPLOYER



**ATTACHMENT A**  
**LIST OF FACILITIES**

<b>FACILITY NAME AND ADDRESS</b>	<b>FACILITY OPERATOR/ BUSINESS</b>	<b>BUSINESS ID NUMBER</b>	<b>FACILITY ID NUMBER</b>	<b>NO REVIEW ID NUMBER</b>
Elmcroft of Little Avenue 7745 Little Avenue Charlotte, NC 28226	EC Opco Little Avenue, LP	2785	971280	3599
Elmcroft of Northridge 600 Newton Road Raleigh, NC 27615	EC Opco Northridge, LP	2786	920861	
Elmcroft of Southern Pines 101 Brucewood Road Southern Pines, NC 28387	EC Opco Southern Pines, LP	2784	971181	



**Arnall  
Golden  
Gregory LLP**

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June 14, 2021

**VIA FEDERAL EXPRESS**

Ms. Martha Frisone  
NC Division of Health Service Regulation  
Certificate of Need Section  
809 Ruggles Drive  
Raleigh, NC 27603



Re: North Carolina Adult Care Homes – Holding Company Insertion  
Request for “No Review Letter”

Dear Ms. Frisone:

This letter is to inform you of the insertion of an internal indirect holding company in the corporate structure of the facilities listed on Attachment A (the “Facilities”). This internal change, effective on May 24, 2021, was made solely for business and tax purposes. As reflected in the enclosed diagrams at Attachment B, the insertion of the holding company does not result in any change to licensees for the Facilities. The insertion of the holding company does not change the Facilities’ federal tax identification number and does not impact day-to-day operations in any way.

It is our understanding that the changes described above and reflected in the diagrams do not require certificate of need review or approval, **therefore we respectfully request the issuance of a “No Review Letter” confirming our understanding.**

Thank you for your attention to this matter. If you have any questions, please do not hesitate to contact me.

Sincerely,

ARNALL GOLDEN GREGORY LLP

A handwritten signature in black ink, appearing to read "Greg M. Gaylis".

Greg M. Gaylis

Enclosures

cc: Barak Berman, Esq.  
Hedy S. Rubinger, Esq.

ATTACHMENT A

Facility Name and Address	Facility Operator
Elmcroft of Little Avenue 7745 Little Avenue Charlotte, NC 28226	EC Opco Little Avenue, LP
Elmcroft of Northridge 600 Newton Road Raleigh, NC 27615	EC Opco Northridge, LP
Elmcroft of Southern Pines 101 Brucewood Road Southern Pines, NC 28387	EC Opco Southern Pines, LP

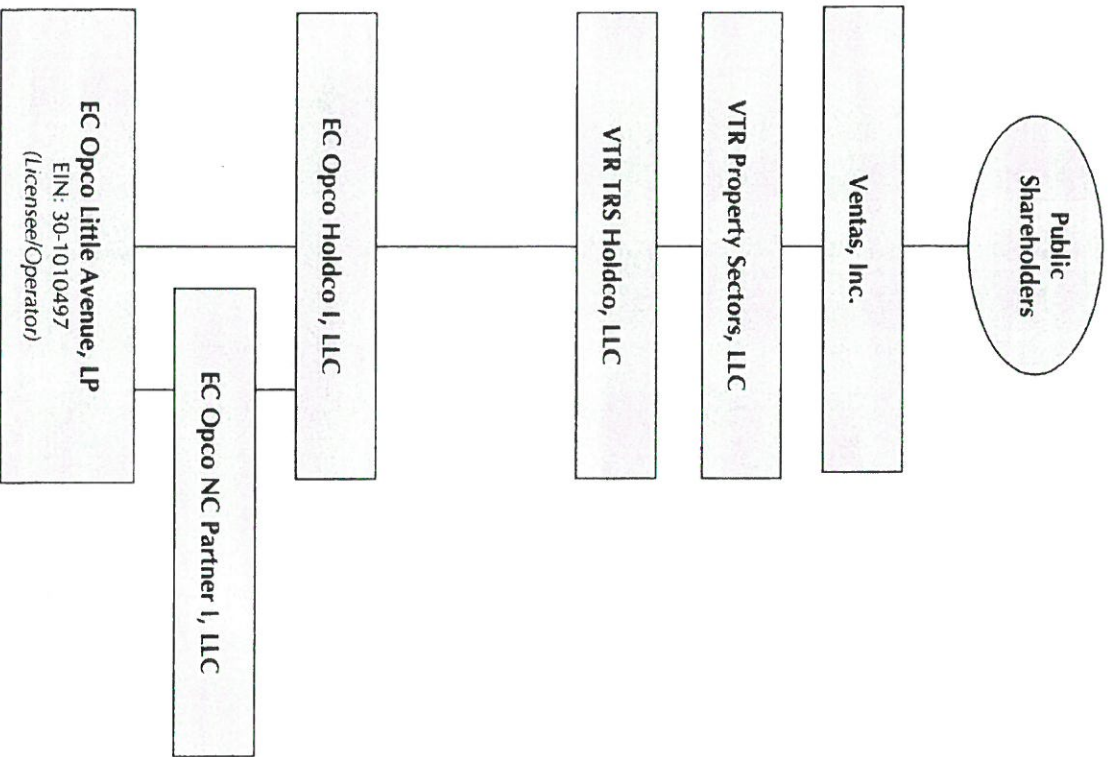
**ATTACHMENT B**

**Overview of Holding Company Insertion**

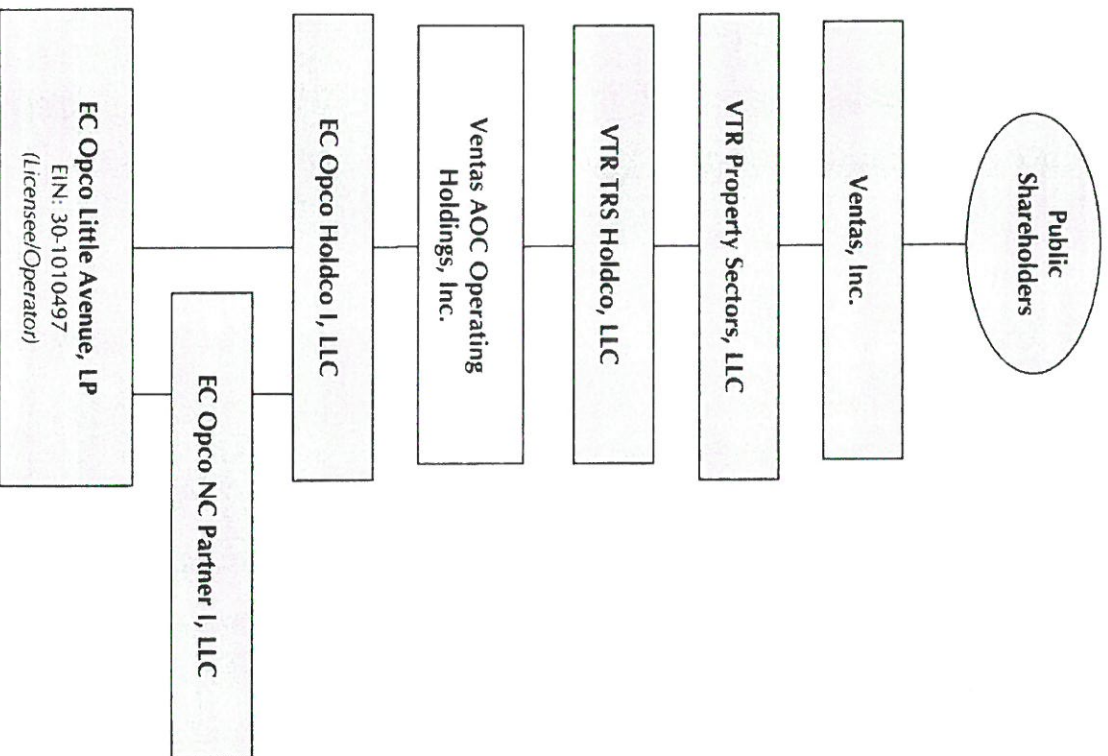
(See attached)

**ELMCROFT OF LITTLE AVENUE  
NORTH CAROLINA**  
Overview of Holding Company Insertion

**CURRENT**



**PROPOSED**



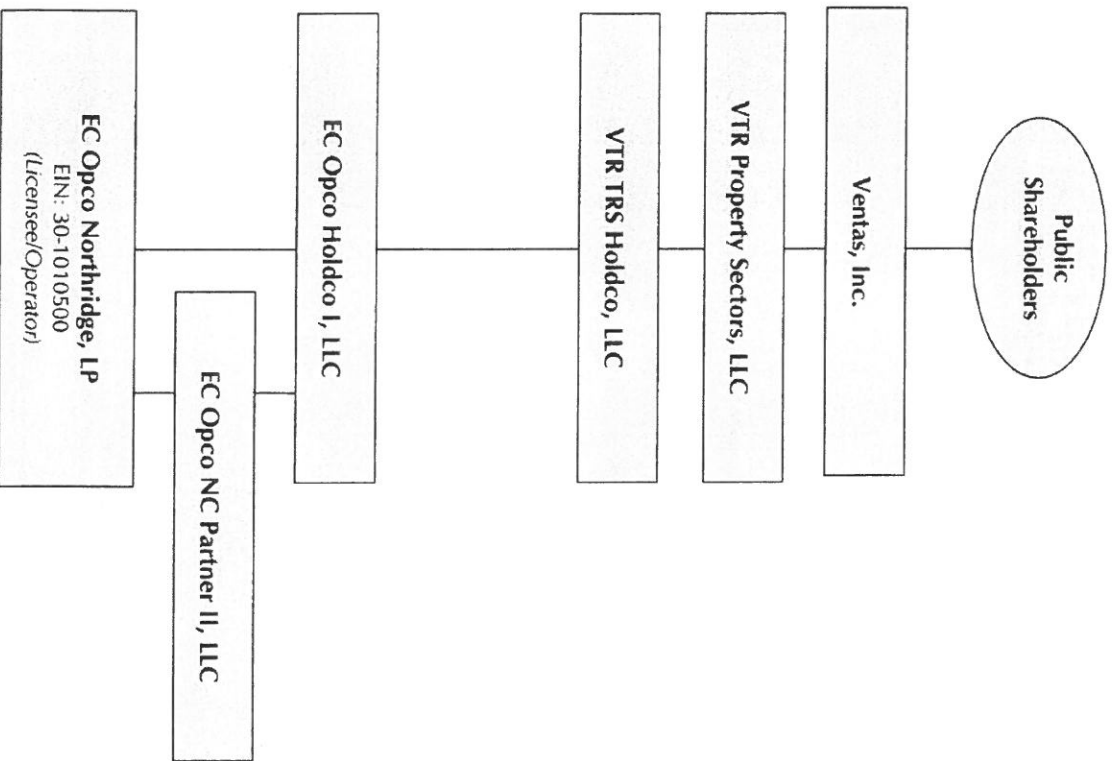
\* Shaded boxes reflect entities that are not changing.



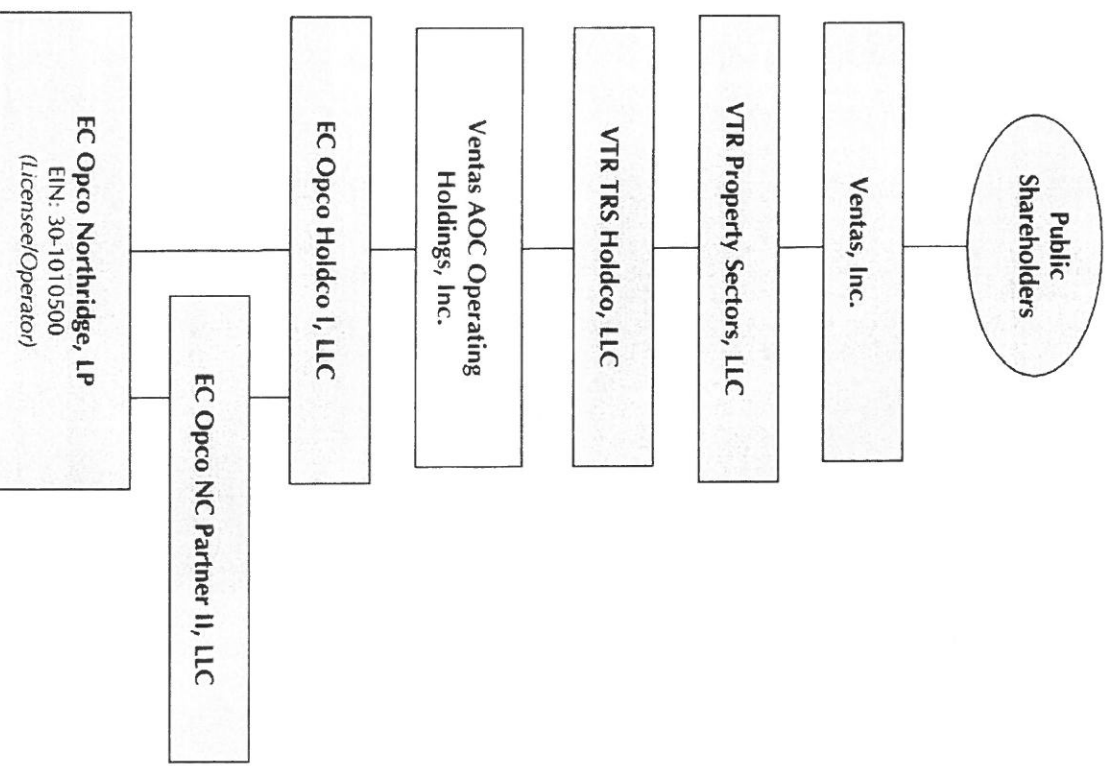
ELMCROFT OF NORTHRIDGE  
NORTH CAROLINA

Overview of Holding Company Insertion

CURRENT



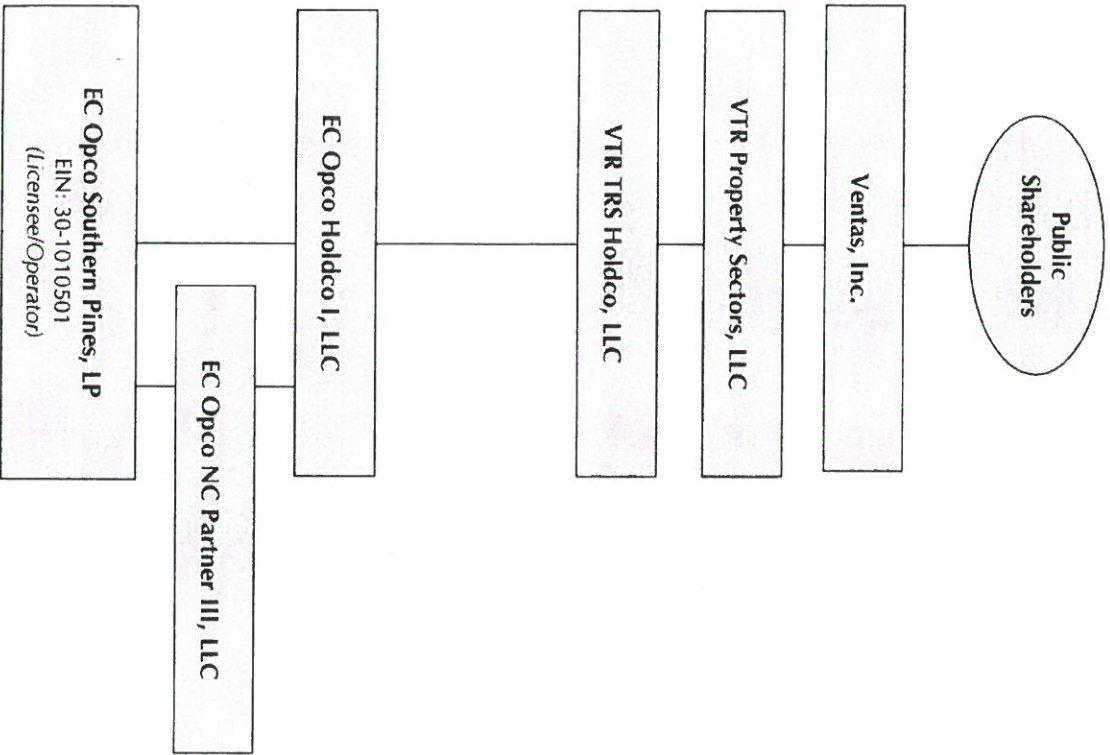
PROPOSED



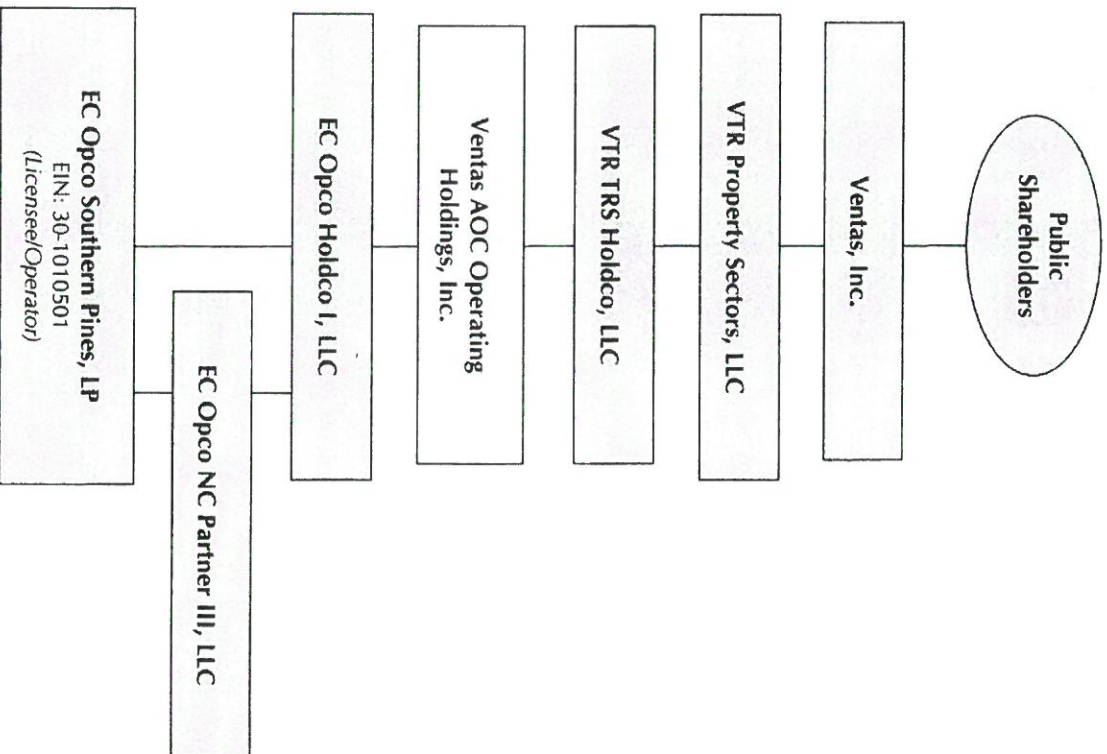
\*Shaded boxes reflect entities that are not changing.

**ELMCROFT OF SOUTHERN PINES  
NORTH CAROLINA**  
Overview of Holding Company Insertion

**CURRENT**



**PROPOSED**



\* Shaded boxes reflect entities that are not changing.