



Joe Lombardo
Governor

NEVADA HEALTH AUTHORITY

DIRECTOR'S OFFICE

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Carson City, NV 89701
NVHA.NV.GOV



Stacie Weeks
Director

September 16, 2025

via Certified Mail: 9489 0090 0027 6499 8270 18
Pahrump Community Health Center, LLC
c/o Community Health Development Partners, LLC
2027 Dodge Street, Suite 500
Omaha, NE 68102

via Email:

mike.clark@communityhdp.com
rob.robinson@communityhdp.com

Subject: NOTICE OF INTENT TO INITIATE PROCEEDINGS TO WITHDRAW LETTER OF APPROVAL

Dear Pahrump Community Health Center, LLC:

You are the holder of a Letter of Approval regarding new construction for the Pahrump Community Health Center, LLC (PCHC) in Pahrump, Nevada. Pursuant to NAC 439A.505, you are hereby notified of the Nevada Health Authority's intent to initiate proceedings to withdraw the Letter of Approval based upon the reasons stated below. Please note that pursuant to SB494, adopted by the Nevada Legislature during the 83rd (2025) session, as of July 1, 2025, the Nevada Health Authority (NVHA) has replaced the Nevada Department of Health and Human Services (DHHS) in administering the provisions related to the letter of approval process. Additionally, please note that as of July 1, 2025, DHHS is now known as the Nevada Department of Human Services (DHS). For purposes of this correspondence, DHHS will continue to be referenced for any events that took place prior to July 1, 2025.

1. PCHC failed to meet the approved timetable set forth in the Letter of Approval and subsequent extension requests granted by DHHS.

Proceedings to withdraw a letter of approval may be initiated if the holder fails to meet the approved timetable set forth in the letter of approval or an extension thereof. NAC 439A.505(1)(a). Here, based upon the Letter of Approval Application submitted in July of 2021, PCHC was granted a Letter of Approval on or about September 21, 2021. DHHS's granting of the Letter of Approval was based upon a timeline for completion of construction and related activities included in the application. This timeline indicated that the project would be fully completed with services being offered to patients by March 15, 2023.

Records indicate that since that time, DHHS granted six extension requests submitted by PCHC. The extension request granted most recently indicated that the facility would be operational with services offered to patients by June 1, 2025 – PCHC did not comply with this date. It appears a seventh extension request was submitted by PCHC in approximately May of 2025. This request indicated the facility was intended to be operational by December 1, 2025, however, the request was not timely submitted pursuant to NAC 439A.475(3) and was denied. A completion date of December 1, 2025, is over two and a half years later than the March 15, 2023,

date submitted in the original application. PCHC failed to meet the approved timetable set forth in the Letter of Approval and all subsequent extensions granted.

2. A transfer of interest in the Letter of Approval may have occurred without approval by the Director.

Proceedings to withdraw a letter of approval may be initiated if the holder violates the provisions of NAC 439A.485 regarding a transfer of interest. NAC 439A.505(1)(e). NAC 439A.485 provides that a person shall not sell, purchase, assign, grant or otherwise transfer or convey in any manner any interest in a letter of approval or a proposed project without first obtaining the written approval of the Director. Here, PCHC's initial application indicates that that MW Building, LLC, J Crawley LLC, and Community Health Development Partners, LLC (CHDP) are 49%, 27%, and 24% owners of PCHC, respectively. Historically, various CHDP personnel have been identified as the appropriate contact persons regarding the PCHC Letter of Approval.

However, correspondence dated July 10, 2025, comes from Mike Clark, the CEO of an organization called "Convergence Health" and appears to be on behalf of PCHC. Mike Clark was previously identified as an employee of CHDP throughout the Letter of Approval process. A cursory search of PCHC, CHDP, and Convergence Health via the Nevada Secretary of State website only adds to the confusion, as MW Building, LLC and J Crawley LLC are not identified as members of the PCHC entity. Further, it would appear that Convergence Health now operates out of Elko Community Health Center, another project facilitated by CHDP. At this time, NVHA has reason to suspect a transfer of interest in the Letter of Approval has occurred without the Director's express written approval.

3. Reports on progress have not been timely submitted by PCHC and may not contain accurate information.

Proceedings to withdraw a letter of approval may be initiated if the holder Violates the provisions of NAC 439A.465 regarding reports on progress, submission of information or access for inspection and examination. Here, PCHC has failed to timely submit quarterly reports on a number of occasions. Pursuant to NAC 439A.465(1), the holder of a letter of approval shall provide NVHA with quarterly progress reports due no later than 30 days after the end of each quarter. DHHS has informed NVHA that quarterly reports have not been submitted timely for several prior quarters.

Additionally, quarterly reports submitted by PCHC may not contain accurate information. The quarterly report submitted in regard to the quarter ending on June 30, 2025, indicated the actual cost to date for the project was \$14,286,937.07, accompanied by the statement that, "There are no changes to the originally approved budget." However, correspondence from PCHC (via Convergence Health) addressed to Director Whitley dated July 10, 2025, states, "To date, we have spent over \$20,000,000..." While these figures present a significant discrepancy on their own, NVHA also notes that the total cost approved in PCHC's Letter of Approval application was \$16,410,927. As mentioned above and further supported by the discrepancies in reported costs, NVHA has reason to believe that a transfer in interest may have occurred, despite PCHC submitting that no changes to financial arrangements have been made on each and every quarterly report since the project's inception.

Pursuant to NAC 439A.505(2), the Director has determined sufficient cause exists to withdraw PCHC's Letter of Approval, and this correspondence shall serve as official notice of intent to initiate proceedings for withdrawal. Per NAC 439A.505(3), NVHA has scheduled a public hearing for the withdrawal to take place at the following date, time, and location, with the Notice of Public Hearing enclosed:

Wednesday, October 29, 2025, beginning at 10:00 AM PST

Video Conference and Telephone:

Microsoft Teams:

<https://teams.microsoft.com/meet/2708335945661?p=AJmsBRVmNysnVnKwJv>

Meeting ID: 270 833 594 566 1 | Passcode: dJ2om3qL

Or to call in (audio only):

(775) 321-6111 – Phone Conference ID: 782 876 669#

In-Person:

727 Fairview Dr. STE. E Carson City, NV 89703

NVHA considers PCHC's Letter of Approval suspended upon receipt of this notice with the Notice of Public Hearing enclosed. NAC 439A.505(4). The suspension is effective until the proceeding for withdrawal is terminated or completed. PCHC, as the holder of the Letter of Approval, has 30 days from the date of receipt of this notice to submit to the Director in writing any relevant documentation negating the reasons for the proposed withdrawal. Given the ongoing circumstances regarding PCHC's failure to comply with the terms of the Letter of Approval, the Director informs you in advance that NVHA requests to receive verifiable documentary evidence in support of any written statements attempting to negate the reasons for the proposed withdrawal. Please refer to NAC 439A.505 for further information regarding proceedings related to the withdrawal of the Letter of Approval.

Please contact Todd Rich (t.rich@nvha.nv.gov), Administrator of NVHA's Health Care Purchasing and Compliance Division, with any questions.

Sincerely,



Stacie Weeks, JD, MPH
Director, Nevada Health Authority

Encl: Notice of Public Hearing