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DELIVERED ELECTRONICALLY

December 17, 2015

Mr. Steven Gordon
Brattleboro Memorial Hospital
17 Belmont Ave.
Brattleboro, VT 05359

RE: Docket No. GMCB-022-15con, Upgrade of Electronic Health Record System, Total expenditure: \$2,842,955

Dear Mr. Gordon:

Thank you for your submissions dated September 30, October 21, October 29, and November 20, 2015 regarding the proposed upgrades to the hospital's electronic health record system.

Based on your submissions, the estimated project cost of \$2,842,955 is very close to the \$3,000,000 threshold which triggers Certificate of Need review. The Board is concerned that based on the scope of the project, it could easily exceed the \$3,000,000 threshold for implementation to make the project fully operational.

Based on the representations provided to date, the Board is not asserting jurisdiction at this time. However, as you proceed with final planning and implementation of the project, if the total project costs reach \$3,000,000, you must notify the Board immediately as the project would be subject to review.

The total cost of the proposed project must include all expenditures to make the upgrade of the electronic health record system fully operational and satisfy state, federal and security compliance requirements. The total project cost must include all costs associated with the migration of data, all hardware, software, licenses, interfaces including legacy systems (from Cerner, as well as other vendors and third parties), maintenance and/or service agreements, management and risk contingencies, consultants, consultant travel, staff training and staff travel costs to make the project fully operational.

If you have any questions, please do not hesitate to contact me at 802-828-2918.

Sincerely,

/S/ *Donna Jerry*
Senior Health Policy Analyst



cc: Judy Henkin, Health Policy Director

