

**Vergennes H.O.P.E LLC**  
**The H.O.P.E. Program**  
1 Alden Place  
Vergennes, Vermont 05491

July 15, 2015

VIA EMAIL / ORIGINAL BY U.S. MAIL

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

**RE:**

Dear Ms. Jerry:

On January 9, 2013, we met with you and other Green Mountain Care Board staff regarding the proposed purchase of a building in Vergennes to be used for a substance abuse treatment facility. In response to our meeting, you sent a letter dated January 14, 2013, in Docket No. GMCB-001-13con, Vergennes Substance Abuse Treatment Facility, to our counsel detailing the requirements for an application for a Certificate of Need.

Please be advised that the nature of that project has evolved quite a bit in the two and one-half years that have passed since we met with you. We have purchased the Vergennes building and acquired a license (effective 2/1/15 – 1/31/16) from the Vermont Department for Children and Families, Family Services Division, Residential Licensing Unit, to operate the H.O.P.E. Program, a Residential Treatment Program, pursuant to 33 V.S.A. § 306. We plan to open the facility upon confirmation from the Green Mountain Care Board that this facility is not subject to Certificate of Need review.

The Helping Others Pursue Empowerment Program (“The H.O.P.E. Program”) is a residential care facility for children. We will provide a comprehensive, holistic-designed residential program for eleven (11) adolescent girls (13-17 years of age) and young women (18-22 years of age) who are evidencing self-injurious behaviors. Our goals are to increase individual and family awareness of this self-destructive behavior; to learn constructive technique and coping skills as alternatives to self-injury; and to learn to identify, verbalize and process feelings appropriately as an alternative to self-injurious-behaviors. For each resident, we will develop a specific, comprehensive, time-limited, goal oriented, outcome based, individualized Plan of Care and education. The Program will use specialized interventions to guide, redirect, modify, and/or manage our residents’ behavior such as positive reinforcement, verbal interventions, de-escalation techniques and therapeutic activities.

We will develop a De-escalation Intervention Plan for each resident which is an individualized plan based on input from the resident and from her family that identifies situations that cause her to engage in unsafe or disruptive behaviors. This plan identifies interventions that have (and those which have not) been successful in the past and planned interventions for the future.

The Program's core components are evidence-based individual and group methodologies (education, mindfulness skills, emotional regulation skills building, distress tolerance, chemical dependency and expressive and experiential based therapies) and family engagement (individual family therapy, family clinical retreat weekends and experiential family treatment).

The H.O.P.E. Program will provide room, board, personal care, laundry and shopping needs. The staff nurse will perform periodic assessments, develop care plans and manage medications and coordinate care with residents' physicians, as and if necessary.

For staffing, the Program will have an Executive Director, Clinical Director/Coordinator, case managers, nurse for medication management, and an evening residential supervisor (See attached staffing schedule).

There will be no physician, occupational therapist, physical therapist, speech language pathologist, etc. on staff for the Program. Medical services, if any, would be secondary and limited. Residents will be scheduled for psychiatric consults and medical care visits as determined necessary by The Program's clinical and nursing staff. The H.O.P.E. Program will not accept individuals with serious, acute illnesses requiring the medical, surgical or nursing care of a general or special hospital or nursing home.

The Program is expected to draw from throughout Vermont and the United States, and especially major northeastern population centers.

Thank you for your review of this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Jack Duffy". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Jack Duffy  
CEO/Managing Member, Vergennes H.O.P.E LLC

**Vergennes H.O.P.E.  
2015 - 2016 Budgeted Salaries**

EMPLOYEE	POSITION	Aniv	Annual Salary	Hourly Rate	Hours per Period		
					Hrs/ Wk	FTE	Base
Vacant	Program Director/Executive Director	Sep	80,000		40	1.0	80,000
Vacant	Clinical Director/Coordinator	Sep	65,000		40	1.0	65,000
Vacant	Case Manager	Sep	35,000		40	1.0	35,000
Vacant	Case Man Extender	Sep		15.25	20	0.5	15,860
Vacant	Evening Residential Supervisor	Sep	45,000		40	1.0	45,000
Vacant	Milieu Counselors	Sep		13.00	520	7.7	208,208
Vacant	Nurse (RN or LPN)	Sep		28.50	56	1.4	82,992
Vacant	Administrative Specialist	Sep	30,000		40	1.0	30,000
Vacant	Billing/Collection	Sep	40,000		40	1.0	40,000
Vacant	Facilities Director	Sep	42,000		40	1.0	42,000
<b>Total Vergennes</b>						<b>16.6</b>	<b>644,060</b>