

30 Main Street, Suite 500 | P.O. Box 1489 | Burlington, VT 05402-1489

April 26, 2019

**DELIVERED ELECTRONICALLY AND VIA FED EX**

Donna Jerry  
Senior Health Policy Analyst  
Green Mountain Care Board  
144 State Street  
Montpelier, VT 05602

**Re: Request for Emergency Certificate of Need**

Dear Ms. Jerry:

This firm represents Rutland Regional Medical Center (“RRMC”). On behalf of RRMC, we are seeking leave from the Green Mountain Care Board (the “Board”) to submit an application for an emergency certificate of need (“CON”). Please note that RRMC is hereby conceding CON jurisdiction by acknowledging that the proposal described herein is subject to the Board’s jurisdiction in accordance with 18 V.S.A. § 9434(b).

RRMC seeks to develop a new health care project in that the hospital must undertake renovations for which the capital costs will exceed \$3,000,000.00. 18 V.S.A. § 9434(b)(1).

The renovations are needed to address urgent risks related to patients at high risk for self-harm and the associated evolving safety standards.

**Emergency CON Criteria**

Pursuant to 18 V.S.A. § 9440 and Green Mountain Care Board Rule 4.000: Certificate of Need (“Rule 4.000”), Section 4.303, an application may request an emergency CON where the applicant explains how the proposed project satisfies the criteria of 18 V.S.A. § 9440 and provides sufficient information showing that the circumstances require action in less time than normally required for review. Such circumstances include, but are not limited to:

- “(a) the repair, replacement, rebuilding, or reequipping of any part of a health care facility due to circumstances beyond the control of the applicant; or
- “(b) any other emergency circumstances beyond the control of the applicant that require expenditure and fall within Certificate of Need jurisdiction.”

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### **Grounds for Emergency CON**

RRMC is a Joint Commission accredited hospital. The Joint Commission ("TJC") is a national accrediting organization that establishes and enforces standards that meet the federal Conditions of Participation ("CoP"). The Centers for Medicare & Medicaid Services ("CMS") has granted TJC "deeming" authority, so that its certification of a facility is deemed as meeting CMS' certification requirements.

To prepare for reaccreditation under TJC, RRMC undertook a Hospital Accreditation Program Accreditation Assessment in August 2018, which resulted in consultation reports (the "Reports") regarding RRMC's compliance with TJC standards. The Reports, in relevant part, show a high risk associated with the unmitigated ligature risks that would be subject to an adverse finding as to TJC standard EC.02.06.01, *The hospital establishes and maintains a safe, functional environment*, in particular as to EP1, *Interior spaces meet the needs of the patient population and are safe and suitable to the care, treatment and services provided*. A copy of this portion of each of the Reports is submitted as Exhibit A.

Both CMS and TJC are increasingly focusing on suicide prevention. RRMC is aware of enforcement actions against at least two hospitals in Vermont/New Hampshire that have been found deficient with respect to these standards. Hospitals must now assess the risks to patients at high risk for self-harm with respect to ligature risks, self-injury and suicide. Since RRMC became aware of the new application of these standards, it has been working closely with an architect and construction company to identify the risks and all possible solutions and alternatives.

The renovations included in the project are all aimed at addressing the findings and recommendations in the Reports. Working with its architects and Construction Company, RRMC has focused on the areas where patients at high risk for self-harm are cared for in both dedicated areas like the psychiatric services inpatient unit and non-dedicated areas, such as the emergency department, and medical/surgical units.

The focus of the proposed renovations is to remedy ligature risks or points; defined as a fixed point to which a ligature can be tied for purposes of hanging or strangulation (handles, coat hooks, pipes, shower rails, radiators, bedsteads, window and door frames, ceiling fittings, hinges, closures, etc.). This also includes anchor points such as gaps between a window/door and its frame, window/door handles, shower heads, shower controls, sink taps, furniture such as metal bed frame arms, chair/table legs, door hinges, ventilation grills, ceiling vents/ducts, sprinkler heads, etc. TJC focuses on rendering these spaces "ligature resistant", rather than ligature-free, acknowledging that one cannot necessarily eliminate ligature risks.

RRMC submits that this project requires an emergency CON because until RRMC's space is rendered ligature free, the Hospital is at risk of CMS issuing an immediate jeopardy citation for newly recognized ligature risks. Given the stakes at issue, patient safety, RRMC posits that an emergency CON is warranted – especially in light of the fact that these changes are warranted by circumstances beyond RRMC's control – increased knowledge about suicide prevention that has led CMS and TJC to make changes to their standards.

Another element to the emergency status, but admittedly secondary to the risk of patient harm, is the serious ramifications that RRMC may face if it is not able to undertake this project in the most expeditious timeframe possible. CMS has noted, "The presence of unmitigated ligature risks in a psychiatric hospital

or psychiatric unit of a hospital is an immediate jeopardy situation. . ." Survey –and-Certification Memo 18-06-Hospitals. An immediate jeopardy situation means that the provider needs to take immediate action to correct a condition that places the health and safety of patients at risk for serious injury, serious harm, serious impairment or death. See CMS State Operations Manual, Appendix Q – Core Guidelines for Determining Immediate Jeopardy § 1 (03-06-19). For a condition that constitutes an immediate jeopardy, a provider needs to implement a plan for immediate action to prevent serious harm from occurring. *Id.* at § VII. RRMC has implemented a short-term plan to mitigate the risk of harm associated with environment hazards by increasing staffing to provide one-to-one supervision for all patients at high risk of self-harm in areas that require renovation. The proposed renovations are necessary to remove the environmental hazards that are the systemic cause of the risk to patients. Completion of the renovations will permanently make the environment safer, will allow RRMC to resume normal staffing, and provide patients with an appropriate level of personal privacy. While RRMC's short-term plan has mitigated the risk to some degree, the environmental hazards could result in an immediate jeopardy finding that could halt a hospital's ability to bill Medicare.

If RRMC is surveyed and found deficient under EC.02.06.01 (and CoP 482.13), then one of the possible outcomes is to have limits imposed on the number of patients it is permitted to take – especially where dedicated inpatient psychiatric space is required. In the State of Vermont, we cannot withstand the loss of inpatient psychiatric beds, given the current lack of statewide capacity.

RRMC submits that the proposed repairs, replacements, rebuilding, and reequipping are all aimed at remedying the interior space to meet the needs of the patient population due to circumstances beyond the control of the applicant. Unlike changes to legislation or rulemaking, RRMC had virtually no lead time to these TJC and CMS enforcement changes. RRMC had no opportunity to properly anticipate the need for the project and undertake a CON application, under the customary timeframe.

Between August 2018 and present day, RRMC has been working to identify the extent of necessary changes, so that it is only now that RRMC has enough information to seek a CON. The scope of work required for a plan to remedy ligature risks or points throughout the facility is complex and substantial.

#### **Project details**

A detailed budget estimate reflecting the full extent of the proposed project is submitted as Exhibit B. The total project cost for this project as shown in Exhibit B is \$3,463,820, but it could be as high as \$4,000,000 when the work is more fully planned out. RRMC has worked with its architect and construction company on any and all less costly alternatives. The proposed project reflects the most cost-effective approach to remedying the risks that need to be eliminated to the extent possible.

Attached as Exhibit C is an itemization/description that RRMC's architects, with previous experience with such changes, have recommended need immediate attention. Such items are indicated in red, subject to clarification in the right-hand column.

Of particular note, the project includes the addition of three patient rooms in space that is currently used as offices and conference room space. The addition of these beds serves two critical purposes. First, these additional beds will help offset, but not entirely eliminate, a reduction in capacity, during the forty-four weeks of construction required for this project. RRMC expects that, on average, during the duration of

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the project the bed capacity will be reduced by one bed per day. Second, the project requires replacing bed platforms in the inpatient psychiatric unit, so that the rooms are ligature-resistant. Such bed platforms are bigger, so that rooms currently being used as doubles will necessarily become single-bed rooms. For this reason, to maintain current capacity once construction is completed, these additional rooms/beds are necessary. And, the completion of the project will allow the Hospital to reduce staffing costs.

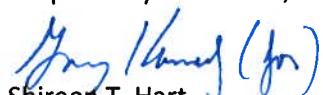
In Fiscal Year 2020, we will be adding to our budget 20.6 FTEs as a means to respond to these safety issues. Nearly half of these new FTEs will be eliminated once the renovations outlined above are complete.

The project is not included in RRMC's Fiscal Year 2019 hospital budget as either an operating or capital item. RRMC did, however, indicate as part of its Fiscal Year 2019 Budget submission an assumption that it would renovate the North and West psychiatric wings in 2020. The estimated cost for this larger renovation project was shown to be \$8,460,690 and was included in the RRMC Four Year capital plan as a CON project that would require GMCB approval. However, this project is more circumscribed and focused on removing the environmental risks identified by the new standards.

Based on the foregoing, RRMC seeks leave to submit its CON application on an emergency basis. If there are questions about whether this project warrants emergency status, RRMC would welcome the opportunity to send a team to meet in person with you and representatives for the Board.

Thank you and the board for considering this request.

Respectfully submitted,



Shireen T. Hart  
Anne E. Cramer

Enclosures

Exhibit A, Vizient TJC HAP Accreditation Assessment Reports, relevant portions.

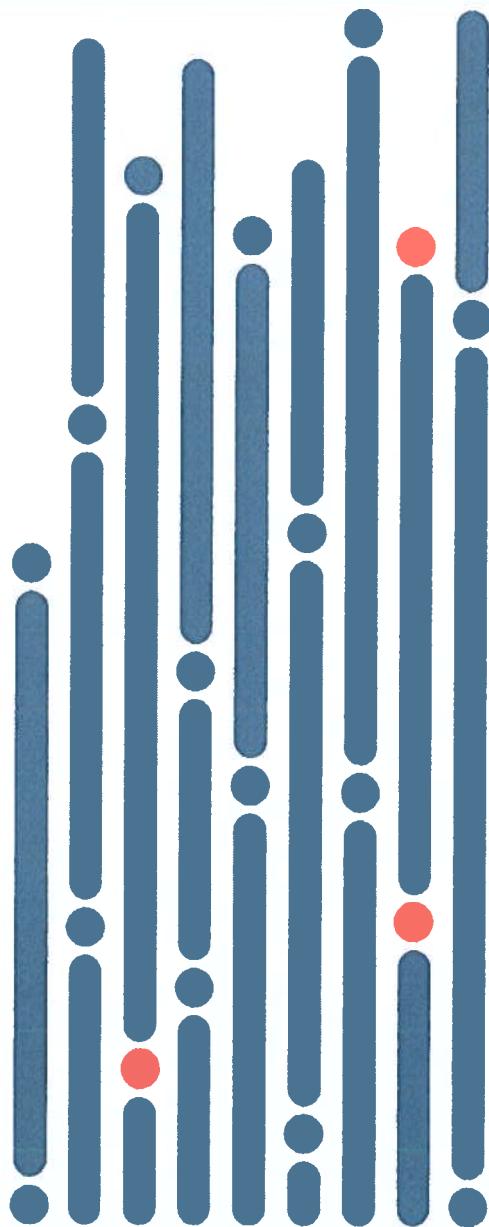
Exhibit B, Detailed budget estimate from HP Cummings Construction Company

Exhibit C, Itemization/description of existing risks, Lavallee/Brensinger Architects

EXHIBIT A

Rutland Regional Medical Center  
Rutland, Vermont

TJC HAP Accreditation Assessment Report  
August 28 and 29, 2018  
Edmund Lydon, MS, CHFM, FASHE



<p><b>Standard EC.02.06.01</b></p> <p><b>The hospital establishes and maintains a safe, functional environment.</b></p> <p>EP 1 Interior spaces meet the needs of the patient population and are safe and suitable to the care, treatment and services provided.</p>	<p>Pattern / High</p> <p>Unmitigated ligature risk could put the hospital in an adverse decision on survey.</p>	<p><b>Emergency Department:</b></p> <p>The Emergency Department Behavioral Health POD would be considered a behavioral health unit based on current practice and design.</p>	<p>Hospitals are expected to follow nationally recognized standards of care and guidelines to minimize risk to suicidal patients.</p> <p>EC News February 2018 Identifying and Mitigating Ligature Risk NPSG 15.01.01</p> <p>Sentinel Event Alert # 56</p> <p>The Joint Commission FAQ for Ligature Risk as it references the Behavioral Health Design Guide, February 2018, Edition 7.3</p> <p>The Joint Commission Perspectives, November 2017.</p> <p>CMS, S&amp;C Memo:18-06-Hospitals</p> <p>CMS / CoP 144 and 701</p> <p>The Joint Commission July 2018 revised FAQs</p>
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#### **Behavioral Health Unit**

Observed during the building tour of the Behavioral Health Unit, medical beds are being used. Safety provisions must be considered for all patients who could be at risk for suicide.

Provisions may include locking the patient room door where a medical bed is being used when unoccupied, removing a medical bed from the unit if not in use, and/or any intervention that restricts access to the medical bed by other patients.

The use of medical beds should be balanced based on the medical needs and the patients' risk for suicide. For patients who require medical beds that have ligature points, there must be appropriate mitigation plans and safety precautions in place. This information should be documented within the patient's medical record. In addition, The Joint Commission will not advise on the type of medical beds or ligature-resistant bed that should be purchased for patients. These decisions should be balanced based on patient needs.

Observed during the building tour, multiple types of furniture in the Behavioral Health Unit that have looping opportunities and can be used for stacking.

Furniture used in behavioral health facilities should be easily cleaned, sturdy, loop resistant, and as heavy as possible to minimize the likelihood of patients turning chairs on end to gain elevation and throwing chairs, tables, etc. The organization should select furniture appropriate for the patient population served.

Consider as much furniture as practical should be built-in or securely anchored in place to prevent stacking or barricading of doors.

Observed during the building tour of the Behavioral Health Unit, fire alarm system horns and strobe boxes have ligature edges.

Ensure fire alarm system horns and strobe boxes have mitigated edges.

Observed during the building tour of the Behavioral Health Unit, numerous wall picture frames, informational boards, wall and ceiling surface mounted plates, access panels, speakers, etc. do not have tamper resistant screws.

Ensure tamper resistant fasteners are used for all fasteners exposed to view on every product and assembly accessible in the inpatient environment and should be noted explicitly in the construction documents. Performance criteria for all fasteners accessible to patients shall be tamper resistant of the hexalobular (6-lobed), pin eject, internal drive system, meeting ISO Standard 10664.

Also ensure pick resistant caulking is used where appropriate.

Observed during building tour of the behavioral health unit, badge scanner protector casing is shelf like and not ligature resistant.

Ensure to risk assess and mitigate per assessment.

Observed during building tour of the behavioral health unit, a shelf mounted on the wall of the patient room which appears to be a ligature risk.

Consider removing the shelf or risk assess and mitigate per assessment.

Observed during the building tour of the Behavioral Health Unit, multiple tight-fitting doors which provide a pinch point that allows a patient to tie a knot (in a sheet, the leg of a pair of jeans, or other object), place it over the top of the door, and close the door to create a hanging device.

Ensure risk assessment is complete for all doors and that they are mitigated by constant monitoring.

One way to reduce this risk in the future is with a pressure-sensitive or photoelectric device placed near the top of the door that can sound an alarm when activated.

Observed during the building tour, door hardware not ligature resistant. Most concerning was a rounded door knob (style typically seen in a home) and non-breakaway lever action hardware.

Ensure to risk assess and consider use of some type of ligature-resistant door hardware. Caution should be given, as some door hardware can be used for ligature attachment in three ways: pulling down, pulling up and over the top of the door, and tying something around the latch edge of the door using both the inside and outside handles(transverse). The latch bolt itself has even been used successfully as an attachment point as it has the opening behind the strike plate; for this reason, a box should always be provided behind the strike plate.

Consider door hardware with a lever handle. These effectively deal with up and down pressure,

but are susceptible to transverse attachment. The lever should move freely in both directions when engaged to reduce ligature attachment risks. It is possible, lever handles may present more risk than some of the other product choices.

Observed during the building tour of the Behavioral Health Unit, numerous patient room doors swing inward to patient room allowing for a barricade opportunity.

Consider mounting patient room furnishings to floor or heavy difficult furniture to move or lift.  
Consider in future projects a door with a door that opens in the opposite direction.

Observed during the building tour of the Behavioral Health Unit, the Rainbow Room was not secured or under direct observation. Patients had access to numerous self-harm objects. A patient was also located in patient room 464 across from the Rainbow room that would have access to the room.

Complete a risk assessment and consider locking door of room when not under constant observation.

Observed during the building tour of the Behavioral Health Unit, a sub corridor outside patient rooms 460 and 461 not under observation where there is opportunity for self-harm. Also, in this area was a linen cart with a linen bag that could be used for self-harm.

Consider removing linen bags from the patient care area. Complete a risk assessment and

consider a camera or constant observation for this area.

During tracer activity on both sides of the Behavioral Health unit, it was observed that staff at the nurse's station responsible for continuous monitoring of the patient CCTV system were performing other unit functions or not at the station. Patient constant monitoring was not occurring for location on the unit.

Consider changing practice where staff are assigned to constant monitoring without disruption. Ensure the entire unit is visible if CCTV is the methodology for observation.

The Joint Commission recommendation #13:  
Patients with serious suicidal ideation must be placed under demonstrably reliable monitoring (1:1 continuous monitoring, observations allowing for 360-degree viewing, continuously monitored video). The monitoring must be linked to the provision of immediate intervention by a qualified staff member when called for.

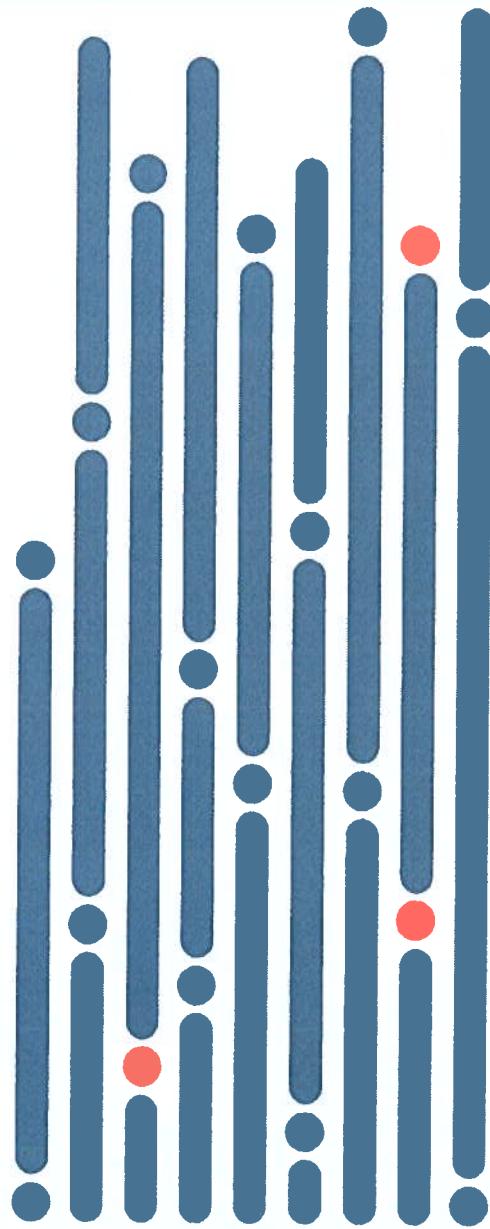
Observed during the building tour of the Behavioral Health Unit, visitor lockers are located on the unit in the patient common area. This allows opportunity for visitors to enter the unit with contents that maybe harmful to staff and patients.

Consider relocating lockers outside of the unit so no visitors can enter the unit with items that maybe harmful to staff and patients.

# Rutland Regional Medical Center Rutland, VT

TJC HAP Accreditation Assessment  
August 28-29, 2018

Karen Roehm, MHA, MSN, RN, CPHQ  
Alexandra Dores, BSN, RN, CJCP



<b>Standard EC.02.06.01</b> <b>The hospital establishes and maintains a safe, functional environment.</b>	<b>EP 1</b> Interior spaces meet the needs of the patient population and are safe and suitable to the care, treatment and services provided.	High / Pattern	<p>The physical environment of both dedicated and non-dedicated spaces for Behavioral Healthcare were reviewed for ligature and other safety risks.</p> <p>The organization provided a copy of the environmental risk assessments in dedicated and non-dedicated spaces. Many of the environmental risks identified by the surveyors were not noted on the risk assessment.</p> <p>Time constraints did not allow for a thorough review of all documents provided. Please ensure that areas, including outpatient Behavioral Health services, are included in the risk assessment process.</p> <p>Ensure that all risk-assessed areas include specificity related to ongoing mitigation actions, responsible individuals and a timeline for completion.</p> <p>The expectation on survey is that the assessment lists each room individually unless rooms are configured exactly alike. The assessment must include all spaces within the locked unit, to include hallways, common areas, patient rooms, bathrooms, shower rooms, restraint/seclusion rooms, etc. Non-dedicated spaces must also be assessed.</p> <p>Effective July 1, 2018: Change in citing ligature/self-harm deficiencies:</p> <p>(CMS), beginning July 1, 2018, Joint Commission surveyors will cite ligature/self-harm deficiencies under Patient's Rights Condition of Participation (CoP) 482.13. Previously, Joint Commission surveyors cited these deficiencies under Physical Environment CoP 482.41, as well as under The Joint Commission's Environment of Care (EC) standard EC.02.06.01, element of performance (EP) 1.</p> <p>Joint Commission surveyors will continue to use and cite EC.02.06.01, EP 1, but add the relationship between this requirement and CoP 482.13 in the crosswalk. CoP 482.13 will be cited for ligature/self-harm findings, and CoP 482.41 will now be cited for non-ligature/self-harm findings. The EC requirement covers several areas beyond those that could be considered as a self-harm risk; it states:</p> <p>EC.02.06.01 — The hospital establishes and maintains a safe, functional environment. Note: The environment is constructed, arranged, and maintained to foster patient safety, provide facilities for diagnosis and treatment, and provide for special services appropriate to the needs of the community.</p> <ul style="list-style-type: none"> <li>•EP 1: Interior spaces meet the needs of the patient population and are safe and suitable to the care, treatment, and services provided.</li> </ul> <p>See Perspectives: NOV 2017, JAN &amp; MAR 2018 TJC</p>
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	<p>Additionally, please refer to the Engineer's report for specific details on environmental risks not noted here.</p> <p><b>BH Inpatient Unit:</b></p> <ul style="list-style-type: none"> <li>In the kitchen area where patient may be unattended, old dumbwaiters were locked with padlocks, creating a looping hazard. Ice/soda machine have a flat top.</li> <li>Phone handset cradles in hallways – need to be tested and included in risk assessment.</li> <li>The nursing station is an open concept; the counter is low and narrow, and there is potential for a patient to access the area. Please refer to the July 2018 TJC Perspectives for additional FAQ related to nursing stations.</li> <li>The laundry room contained large tubs of powdered laundry detergent which were sitting unsecured. While staff indicated patients do not have access to this room, the potential for a patient to overpower a staff member and gain unauthorized access to this room should be risk – assessed.</li> <li>PICU (high acuity side) – ice machine and refrigerator have flat tops, tables are not fastened down.</li> <li>A reclining chair with moving parts and ligature risks was in the group room; the vinyl covering was shredding and in poor condition.</li> </ul>	<p>Graphic representation of the guidance in Nov 2017 TJC Perspectives</p>  <p>TJC-CMS Expert Panel Guidance Suicide CMS Memo Dec 2017:</p>  <p>Survey-and-Cert-Lett er-18-06 - Ligature ris Additional Resources:</p> <p>Sentinel Event Alert # 56 Suicide Risk Booster - available to accredited organizations via their Secure Extranet Site EC News February, 2018 Volume 21 – Issue 2 – <i>The Safe Environment: Identifying and Mitigating Ligature Risks.</i></p> <p>See also CMS CoP 482.13 (c) (2).</p>
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	<ul style="list-style-type: none"> <li>In the comfort room, loose cushions could be used as a distraction.</li> <li>Many vents contained a mix of regular flat and tamper proof screws.</li> <li>A transfer board was propped against the wall in the restraint room bathroom.</li> <li>In the exercise room, the equipment was not included on the risk assessment.</li> </ul> <p>A tour of the ED behavioral health “safe” pod was conducted. This space was presented as non-designated; however, it was not evident that mitigation strategies were consistently implemented and enforced, including one-to-one constant observation.</p> <p>Risks identified:</p> <ul style="list-style-type: none"> <li>Regular ED stretchers in use</li> <li>Chairs, over-bed tables, door hinges, door handles, air vents in rooms presented ligature risks.</li> </ul> <p>A high risk patient was being observed by a sitter. The observation record was reviewed; it was noted that on several occasions, the patient was monitored via camera in lieu of one-to-one constant observation. This practice would not meet the TJC/CMS requirement for ONE-TO-ONE observation of patients assessed to be at high risk for suicide in the ED.</p> <p>Please see references provided in adjacent column.→</p> <p>The organization does not require CCTV monitors to be staffed 24/7, therefore, the</p>	<p>TJC SIG – 05/23/18</p> <p><b>Use of single sinks</b></p> <p>Q: Is it acceptable to do initial decontamination of a Trophon device in the single sink within a room? The sink is cleaned / decontaminated after the Trophon is rinsed in it and before it is returned to use as a hand washing sink. Is this an acceptable practice?</p>
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	<p>use of cameras as a mitigation strategy would not meet the requirements in areas where risks cannot be monitored via direct line-of sight.</p> <p>ED waiting room bathroom – nurse call pull cord was wrapped around a grab bar rendering it non-functional.</p> <p>The single sink in the Radiology Ultrasound exam room was used for both rinsing the endovaginal probe during the HLD process and for hand hygiene. Please see recent TJC SIG in adjacent column.→</p> <p><i>These items may be scored on survey as a CMS Condition Level Deficiency.</i></p>	<p>A: Rinsing of a vaginal probe in a sink that is also utilized for hand hygiene is not permissible. A sink designated for decontamination of soiled items, regardless of whether the sink is cleaned or not, should not be used for hand hygiene. Surveyors will look for this during survey and if observed, would be scored under EC.02.06.01.</p>
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## RRMC 4th Floor PSIU Mock Survey Renovations DD Budget Estimate REV 1 04.25.19

Project: RRMC PSIU West and North Wing

Architect: Lavallee Brensinger Architects

### Summary Sheet

Construction Cost Budget Estimate with A01 and A03	\$2,895,878
Move PI Staff Offsite & Renovate	\$100,000
Owner /soft cost: to include Architect, Engineer fees, and other	allow 15.00% \$434,382
FFE and Equipment	allow 13.00% \$376,464
Owner Contingency	allow 9.00% \$260,629
<b>Total Project cost</b>	<b>\$4,067,353</b>

## EXHIBIT B

3:36 PM  
4/25/2019  
S:\Proposal\RRMC PSIU Mock Survey E1425\Estimates\RRMC 4th Floor PSIU Mock Survey Renovations DD Budget Estimate  
REV 1 04.25.19



## RRMC 4th Floor PSIU Mock Survey Renovations DD Budget Estimate REV 1 04.25.19

Project: RRMC PSIU West and North Wing

printed on

04/25/19

Architect: Lavallee Brensinger Architects

ITEM	DESCRIPTION	QUAN	U/M	UNIT LABOR	LABOR	UNIT MAT'L	MAT	SUB COST	TOTAL
1	GENERAL CONDITIONS			\$198,860		\$152,174	\$0	\$351,034	
2	DEMOLITION & ALTERATIONS			\$89,151		\$40,319	\$0	\$129,470	
3	CONCRETE			\$390		\$260	\$0	\$650	
4	MASONRY			\$0		\$0	\$0	\$0	
5	METALS			\$0		\$0	\$0	\$0	
6A	ROUGH CARPENTRY			\$4,800		\$5,000	\$0	\$5,000	
6B	FINISH CARPENTRY & MILLWORK			\$0		\$4,000	\$0	\$8,800	
7	THERMAL & MOISTURE PROTECTION			\$14,400		\$50,150	\$78,974	\$129,124	
8	DOORS, WINDOWS & GLASS			\$95,432		\$16,120	\$0	\$30,520	
9	FINISHES			\$38,880		\$142,465	\$10,445	\$248,342	
10	SPECIALTIES			\$3,690		\$258,988	\$0	\$297,868	
11	EQUIPMENT			\$0		\$24,040	\$23,895	\$51,625	
12	FURNISHINGS			\$0		\$0	\$0	\$0	
13	SPECIAL CONSTRUCTION			\$0		\$0	\$0	\$0	
14	CONVEYING SYSTEMS			\$0		\$0	\$0	\$0	
21	FIRE SUPPRESSION			\$0		\$0	\$0	\$0	
22	PLUMBING			\$0		\$6,000	\$85,750	\$91,750	
23	HEATING, VENTILATING, AND AIR-CONDITIONING (HVAC)			\$0		\$0	\$0	\$0	
25	INTEGRATED AUTOMATION			\$0		\$30,000	\$303,000	\$333,000	
26	ELECTRICAL			\$0		\$0	\$0	\$0	
27	COMMUNICATIONS			\$0		\$33,550	\$386,310	\$419,860	
28	ELECTRONIC SAFETY & SECURITY			\$0		\$7,500	\$0	\$7,500	
31	EARTHWORK			\$0		\$33,710	\$72,865	\$106,575	
32	EXTERIOR IMPROVEMENTS			\$0		\$0	\$0	\$0	
33	UTILITIES			\$0		\$0	\$0	\$0	

\* Pricing is based on Lavallee Brensinger 4th Floor Inpatient drawings AD1.1, AD1.2, A1.1, & A1.2 dated 2-25-2018 and the product binder dated 10-12-2018.

### Building Floor Areas:

Phase 1 1,260 sf  
Phase 2 8,690 sf

Total Building 9,950 sf  
Cost /SF \$252.19

CM Estimating Contingency	10.00%	\$221,112
sub tol		\$2,432,230
G.C. BOND		\$20,066
sub tol		\$2,452,296
CM FEE	2.25%	\$57,030
<b>TOTAL</b>		<b>\$2,509,326</b>

### ALTERNATES

A01: Phase 1, Add Third Patient Room & Bathroom	\$76,443
A02: Replace Corridor Security Ceilings with 2x2 Armstrong Metalworks	not accepted
A03: Moderate Bathroom Renovations in lieu of Minor	\$310,109
A04: Remove & Replace West Corridor Handrails	not accepted

The construction estimate excludes typical owner costs such as:

- Property
- Environmental clearance
- Mold Remediation
- Abatement of Hazardous Materials
- Legal/Administrative
- Financing
- Clerk of the Works/Owners Representative
- Architectural and Special Consultants Fees and Reimbursables
- Moving Costs
- Utility Company Charges
- Permits
- All Testing
- Furnishings (System Furnishings, Furniture, Loose Equipment, etc.)
- Window Treatment
- Interior Signage
- Owner Provided Equipment and Wire
- Property Insurance, Builder's Risk including Deductible
- Owner's Construction Contingency

**TOTAL WITH ALTERNATES** **\$2,895,878**

Our estimate assumes there are no unusual sub-surface conditions such as, but not limited to:

- Boulders
- Ledge
- Ground Water
- Unsuitable or Contaminated Soils
- Inadequate Bearing


**RRMC 4th Floor PSIU Mock Survey Renovations DD Budget Estimate REV 1 04.25.19**

Project: RRMC PSIU West and North Wing

printed on

04/25/19

Architect: Lavallee Bresniger Architects

ITEM	DESCRIPTION	QUAN	U/M	UNIT LABOR	LABOR	UNIT MAT'L	MAT	SUB COST	TOTAL
<b>1 GENERAL CONDITIONS</b>									
010 General & Special Conditions									
0101004 Overtime Premium		80 hrs		\$30	\$2,400		\$0		\$2,400
012 Field Supervision									
0101201 Superintendent		47 wks		\$3,320	\$156,040		\$0		\$156,040
0101202 Field engineer	in above			\$0	\$0		\$0		\$0
014 Expenses									
0101401 Key Person Expenses		47 wks		\$0	\$25.00	\$1,175			\$1,175
018 Field Office									
0101601 Office Trailer Rental		11 mo		\$0	\$270.00	\$2,970			\$2,970
0101602 Move Trailers				\$0	\$0	\$0			\$0
0101603 Storage trailer/shed	see divisions			\$0	\$0	\$0			\$0
0101604 Office supplies		11 mo		\$0	\$50.00	\$550			\$550
018 Safety Program									
0101801 First aid		1 ls		\$0	\$250.00	\$250			\$250
0101805 Protective Equipment		1 ls		\$0	\$250.00	\$250			\$250
0101807 Infect Control/Life Safety		47 wks		\$0	\$200.00	\$9,400			\$9,400
022 Tools									
0102202 Small Tools		47 wks		\$0	\$25.00	\$1,175			\$1,175
0102203 Equipment to Plant				\$0	\$0	\$0			\$0
0102204 Rental, Company	minor	11 mo		\$0	\$500.00	\$5,500			\$5,500
0102205 Rental, Non-Company				\$0	\$0	\$0			\$0
0102206 Pick-Up Trucks		11 mo		\$0	\$650.00	\$7,150			\$7,150
0102207 Company Gas		47 wks		\$0	\$75.00	\$3,525			\$3,525
0102208 Tool Repair				\$0	\$0	\$0			\$0
0102209 Lifts for Trades				\$0	\$0	\$0			\$0
041 Project Management									
0104101 Senior Project Manager		47 wks		\$0	\$240.00	\$11,280			\$11,280
0104102 Project Manager \$91 x 12 hrs p/wk		47 wks		\$0	\$1,092.00	\$51,324			\$51,324
0104103 Admin Travel Expense		47 wks		\$0	\$120.00	\$5,640			\$5,640
0104104 Executive Management		inc. in fee		\$0	\$0	\$0			\$0
0104106 Admin support		47 wks		\$0	\$135.00	\$6,345			\$6,345
042 Scheduling									
0104201 In House Scheduling		inc. in fee		\$0	\$0	\$0			\$0
0104202 Scheduling Consultant		ls		\$0	\$0	\$0			\$0
0104203 Maintain Schedules		inc. in fee		\$0	\$0	\$0			\$0
043 Preconstruction Services									
0104301 Fee		1 ls		\$0	\$9,300.00	\$9,300			\$9,300
0104302 Reimbursables				\$0	\$0	\$0			\$0
045 Insurances/Taxes									
0104501 State Sales Tax, EXEMPT									
0104503 Builders Risk		by owner		\$0	\$0	\$0			\$0
0104504 Owner Protective Liability		by owner		\$0	\$0	\$0			\$0
0104505 Bridge B.R. Deduct		ls		\$0	\$0	\$0			\$0
0104506 Other Insurance		ls		\$0	\$0	\$0			\$0
085 Permits									
0106502 Zoning/Local Rutland City	allow	1 ls		\$0	\$7,500.00	\$7,500			\$7,500
0108503 State/Fire Safety based on \$1.5 million	allow	1 ls		\$0	\$20,000.00	\$20,000			\$20,000
330 Survey & Layout									
0133003 Engineer Layout	none	1 ls		\$0	\$0	\$0			\$0
335 Protection/Repair Grounds									
0133504 Maintain Egress		1 ls		\$0	\$1,500.00	\$1,500			\$1,500
0133505 Temp Signage		1 ls		\$0	\$500.00	\$500			\$500
510 Temporary Utilities									
0151002 Temp Power Consump		by owner		\$0	\$0	\$0			\$0
0151003 Temp Lights & Wire		by subs		\$0	\$0	\$0			\$0
520 Winter Conditions									
0152001 Temp heat/fuel	none	mo		\$0	\$0	\$0			\$0
0152002 Temp heat equipment	none	mo		\$0	\$0	\$0			\$0
0152003 Winter weather shelter	none	ls		\$0	\$0	\$0			\$0
0152004 Snow removal				\$0	\$0	\$0			\$0
525 Construction Aids									
0152507 Temp water				\$0	\$0	\$0			\$0
0152508 Temp Toilets & Wash		11 mo		\$0	\$240.00	\$2,640			\$2,640
530 Barriers and Enclosures									
0153001 Temp Laydown area		1 ls		\$0	\$1,200	\$1,200			\$1,200
0153002 Temp fencing				\$0	\$0	\$0			\$0
0153003 Temp Barricades				\$0	\$0	\$0			\$0
540 Security									
0154001 Watchman		ls		\$0	\$0	\$0			\$0
0154002 Security Systems		ls		\$0	\$0	\$0			\$0
550 Quality Control/Testing									
0156001 Test Soils/Concrete	none	1 ls		\$0	\$0	\$0			\$0
0156002 Test Steel/Fire	none	1 ls		\$0	\$0	\$0			\$0
0156003 Assist with Testing		ls		\$0	\$0	\$0			\$0
0156004 IBC Testing	none	1 ls		\$0	\$0	\$0			\$0
985 Temporary Fire Protection									
0158501 Temp fire extinguishers		6 ea		\$0	\$250.00	\$1,500			\$1,500
580 Project Identification									
0158001 Project Sign		ls		\$0	\$0	\$0			\$0
660 Testing Systems									
0166001 Commissioning	none			\$0	\$0	\$0			\$0
0166002 Operational Testing		ls		\$0	\$0	\$0			\$0
710 Cleaning									
0171001 Recycle Plan				\$0	\$0	\$0			\$0



## RRMC 4th Floor PSIU Mock Survey Renovations DD Budget Estimate REV 1 04.25.19

Project: RRMC PSIU West and North Wing  
Architect: Lavallee Brensingger Architects

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ITEM	DESCRIPTION	QUAN	U/M	UNIT LABOR	LABOR	UNIT MAT'L	MAT	SUB COST	TOTAL
0171002	Dumpsters				\$0		\$0		\$0
0171005	Progress Clean	47	wks	\$860.00	\$40,420		\$0		\$40,420
0171007	Final Clean Building				\$0		\$0		\$0
720	Project Documents								\$0
0172001	Document Print & Distrnb				\$0		\$0		\$0
0172002	Photos				\$0		\$0		\$0
0172003	As-Built Drawings				\$0		\$0		\$0
0172004	Coordination Drawings				\$0		\$0		\$0
0172007	CAD Record Files				\$0		\$0		\$0
770	Project Closeout								\$0
0177001	Warranties				\$0		\$0		\$0
0177002	O&M Manuals	1	ls		\$0	\$1,500.00	\$1,500		\$1,500
0177003	Closeout Expenses				\$0		\$0		\$0
800	LEED Objectives								
0180001	General				\$0		\$0		\$0
810	Allowances								
0181001	General				\$0		\$0		\$0
820	Alternatives								
0182001	General				\$0		\$0		\$0
830	Owner Furnish								
0183001	General				\$0		\$0		\$0
840	Contractor Install								
0184001	General				\$0		\$0		\$0
850	Project Management								
0185001	Environmental Protection				\$0		\$0		\$0
0185002	Indoor Air Quality				\$0		\$0		\$0
0185003	Storm Water Control				\$0		\$0		\$0
0185004	Moisture & Mold Control				\$0		\$0		\$0
860	Supplemental GC's								
0186001	Punch List				\$0		\$0		\$0
0186002	Training				\$0		\$0		\$0
	ITEM TOTAL				\$198,860	\$45,872	\$152,174	\$0	\$351,034

## 2 DEMOLITION & ALTERATIONS

024100 Selective Demolition									
<b>Phase 1</b>									
<b>Temp provisions</b>									
Move owner equipment/furnishings									
	32	hrs	\$60.00	\$1,920		\$0		\$0	
Temp partitions	760	sf	\$8.00	\$6,080	\$2.00	\$1,520		\$7,600	
Walk-off mats	15	pads	\$60.00	\$900	\$90.00	\$1,350		\$2,250	
HEPA filters	14	wks	\$30.00	\$420	\$25.00	\$350		\$770	
Carts	14	wks	\$0.00	\$0	\$15.00	\$210		\$210	
Negative air machines	14	wks	\$150.00	\$2,100	\$75.00	\$1,050		\$3,150	
Pressure indicator	14	wks	\$30.00	\$420	\$25.00	\$350		\$770	
Dumpsters	3	ea		\$0	\$1,250.00	\$3,750		\$3,750	
<b>Demo</b>									
CL1, remove ceilings	605	sf	\$0.75	\$454	\$0.25	\$151		\$0	
CL2, remove drywall ceilings	94	sf	\$1.25	\$118	\$0.50	\$47		\$165	
CM1, remove casework & counter-tops	13	lf	\$24.00	\$312	\$2.00	\$28		\$338	
CM4, remove counter-tops	24	lf	\$20.00	\$480	\$2.00	\$48		\$528	
DW3, remove aluminum double door opening	1	ea	\$120.00	\$120	\$10.00	\$10		\$130	
DW8, remove door, frame & hardware	3	ea	\$120.00	\$360	\$10.00	\$30		\$390	
DW12, remove door hardware, salvage door	2	ea	\$90.00	\$180	\$10.00	\$20		\$200	
DW14, remove door hinges, salvage door & hardware	1	ea	\$60.00	\$60	\$10.00	\$10		\$70	
E1, remove & salvage lockers	3	ea	\$60.00	\$180	\$10.00	\$30		\$210	
E3, remove display boards, wall shelving, & misc equip	1	ea	\$180.00	\$180	\$10.00	\$10		\$190	
E9, remove existing sink					\$0				\$0
F1, remove VCT flooring & base	94	sf	\$1.00	\$94	\$0.25	\$24		\$118	
F2, remove flooring & base	610	sf	\$1.00	\$610	\$0.25	\$153		\$763	
F3, remove ceramic flooring	81	sf	\$1.75	\$142	\$0.50	\$41		\$183	
P1, demo wall assembly, 12' tall	907	sf	\$3.00	\$2,721	\$0.50	\$454		\$3,175	
P3, demo wall for new opening, 8' tall	216	sf	\$3.00	\$648	\$0.50	\$108		\$756	
<b>Phase 2</b>									
<b>Temp provisions</b>									
Move owner equipment/furnishings	208	hrs	\$60.00	\$12,480		\$0		\$0	
Temp partitions	1900	sf	\$8.00	\$15,200	\$2.00	\$3,800		\$19,000	
Walk-off mats	20	pads	\$60.00	\$1,200	\$90.00	\$1,800		\$3,000	
HEPA filters	33	wks	\$30.00	\$990	\$25.00	\$825		\$1,815	
Carts	33	wks	\$0.00	\$0	\$15.00	\$495		\$495	
Negative air machines	33	wks	\$150.00	\$4,950	\$75.00	\$2,475		\$7,425	
Pressure indicator	33	wks	\$30.00	\$990	\$25.00	\$825		\$1,815	
Dumpsters	5	ea		\$0	\$950.00	\$4,750		\$4,750	
<b>Demo</b>									
CL1, remove ceilings	402	sf	\$0.75	\$302	\$0.50	\$201		\$0	
CL2, remove drywall ceilings	220	sf	\$1.25	\$275	\$0.50	\$110		\$385	
CL4, remove portions of ceilings	865	sf	\$1.25	\$1,081	\$0.50	\$433		\$1,514	
CM1, remove casework & counter-tops	20	lf	\$24.00	\$480	\$5.00	\$100		\$580	
CM4, remove counter-tops	11	lf	\$20.00	\$220	\$5.00	\$55		\$275	
CM5, remove Nurse station, complete	1	ls	\$2,880.00	\$2,880	\$500.00	\$500		\$503	
DW8, remove door, frame & hardware	13	ea	\$120.00	\$1,560	\$25.00	\$325		\$1,885	
DW10, remove door hardware, salvage door	1	ea	\$90.00	\$90	\$25.00	\$25		\$115	
DW12, remove door hardware, salvage door	2	ea	\$90.00	\$180	\$25.00	\$50		\$230	
DW13, remove lockset only	11	ea	\$30.00	\$330	\$25.00	\$275		\$605	
DW14, remove door hinges, salvage door & hardware	3	ea	\$60.00	\$180	\$25.00	\$75		\$255	
E3, remove display boards, wall shelving, & misc equip	2	ea	\$180.00	\$360	\$50.00	\$100		\$460	



**RRMC 4th Floor PSIU Mock Survey Renovations DD Budget Estimate REV 1 04.25.19**

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ITEM	DESCRIPTION	QUAN	U/M	UNIT LABOR	LABOR	UNIT MAT'L	MAT	SUB COST	TOTAL
E4, remove shelving, curtain track & coat hooks		13	ea	\$180.00	\$2,340	\$50.00	\$650		\$2,990
E9, remove existing sink	Refer to division 230000				\$0		\$0		\$0
E17, remove corridor railings		226	lf	\$8.00	\$1,808	\$1.00	\$226		\$2,034
E18, remove ceiling mounted speaker box	Refer to division 260000				\$0		\$0		\$0
E19, remove floor bed restraint hooks		13	ea	\$30.00	\$390	\$10.00	\$130		\$520
E20, remove non-lamper resistant outlet plates	Refer to division 260000				\$0		\$0		\$0
E22, remove electrical wall plates	Refer to division 260000				\$0		\$0		\$0
E23, remove tel/data & cable outlets	Refer to division 260000				\$0		\$0		\$0
F1, remove VCT flooring & base		1400	sf	\$1.25	\$1,750	\$0.50	\$700		\$2,450
P1, demo wall assembly, 12' tall		2360	sf	\$3.00	\$7,080	\$0.50	\$1,180		\$8,260
Cul for other work, labor	allow	80	hrs	\$60.00	\$4,800		\$0		\$4,800
Core penetrations for trades, labor	allow	64	hrs	\$60.00	\$3,840		\$0		\$3,840
Core penetrations for trades, material	allow	1	ls		\$0	\$500.00	\$500		\$500
Assist-install owner furnishing	allow	24	hrs	\$58.00	\$1,392	\$3.00	\$72		\$1,464
Off hour work/premium	allow	24	hrs	\$30.00	\$720	\$25.00	\$600		\$1,320
Remove & replace ceilings	allow	1	ls	\$2,784.00	\$2,784	\$1,500.00	\$1,500		\$4,284
Forklift		3	mo		\$0	\$2,600.00	\$7,800		\$7,800
ITEM TOTAL					\$89,151	\$10,319	\$0		\$129,470
<b>3 CONCRETE</b>									
033000 Cast-In-Place Concrete									
Patch concrete floor at removed anchors (E19)		13	ea	\$30.00	\$390	\$20.00	\$260		\$650
ITEM TOTAL					\$390		\$260		\$650
<b>4 MASONRY</b>									
042000 Unit Masonry	NONE								
ITEM TOTAL					\$0		\$0		\$0
<b>5 METALS</b>									
051200 Structural Steel Framing	NONE								
055000 Metal Fabrications									
Misc metals	allow	1	ls		\$0	\$5,000.00	\$5,000		\$5,000
ITEM TOTAL					\$0		\$5,000		\$5,000
<b>6A ROUGH CARPENTRY</b>									
061054 Wood Blocking and Curbing									
FT wood blocking, labor	allow	80	hrs	\$60.00	\$4,800		\$0		\$4,800
FT wood blocking, material	allow	1	ls		\$0	\$4,000.00	\$4,000		\$4,000
ITEM TOTAL					\$4,800		\$1,000		\$8,800
<b>6B FINISH CARPENTRY &amp; MILLWORK</b>									
062000 Finish Carpentry & Architectural Woodwork									
064100 Architectural Wood Casework									
123600 Countertops									
Millwork Sub	Windham	1	budget		\$0		\$0		\$78,974
Typical patient room casework	In above				\$0		\$0		\$0
Typical patient room solid surface	In above	6	lf		\$0		\$0		\$0
Temporary staff/nurse station casework	In above				\$0		\$0		\$0
Temporary staff/nurse station solid surface	In above				\$0		\$0		\$0
Dumbwaiter PLAM doors	In above	11	lf		\$0		\$0		\$0
Corridor bench	In above				\$0		\$0		\$0
Corridor bench solid surface	In above	4	sf		\$0		\$0		\$0
Nurse station die wall	In above				\$0		\$0		\$0
Nurse station paneling	In above				\$0		\$0		\$0
Nurse station solid surface	In above				\$0		\$0		\$0
Nurse station tall cabinets		11	lf		\$0	\$650.00	\$7,150		\$7,150
Dining					\$0		\$0		\$0
Base cabinets		8	lf		\$0	\$450.00	\$3,600		\$3,600
Counter-top, solid surface		11	lf		\$0	\$250.00	\$2,750		\$2,750
Sink enclosure, solid surface		2	lf		\$0	\$225.00	\$450		\$450
Wall cabinets		11	lf		\$0	\$325.00	\$3,575		\$3,575
Soiled Utility					\$0		\$0		\$0
Base cabinets		5	lf		\$0	\$450.00	\$2,250		\$2,250
Counter-top, solid surface		5	lf		\$0	\$250.00	\$1,250		\$1,250
Wall cabinets		5	lf		\$0	\$325.00	\$1,625		\$1,625
Laundry					\$0		\$0		\$0
Counter-top, solid surface		5	lf		\$0	\$250.00	\$1,250		\$1,250
Deep counter-top, solid surface		7	lf		\$0	\$300.00	\$2,100		\$2,100
Open Shelving, PLAM		9	lf		\$0	\$75.00	\$675		\$675
Reception					\$0		\$0		\$0
Counter-top, solid surface	In above	4	lf		\$0		\$0		\$0
Med Room					\$0		\$0		\$0
Wall cabinets		7	lf		\$0	\$325.00	\$2,275		\$2,275
Base cabinets		6	lf		\$0	\$450.00	\$2,700		\$2,700
Deep Counter-top, solid surface		12	lf		\$0	\$300.00	\$3,600		\$3,600
Counter-top, solid surface		7	lf		\$0	\$250.00	\$1,750		\$1,750
Sink enclosure, solid surface		2	lf		\$0	\$225.00	\$450		\$450
Dictation					\$0		\$0		\$0


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ITEM	DESCRIPTION	QUAN	U/M	UNIT LABOR	LABOR	UNIT MAT'L	MAT	SUB COST	TOTAL
Corridor	Counter-top, solid surface	in above	9 lf		\$0		\$0		\$0
					\$0		\$0		\$0
	Tall cabinets		8 lf		\$0	\$650.00	\$5,200		\$5,200
	Miscellaneous Casework	allow	1 ls		\$0	\$7,500.00	\$7,500		\$7,500
					\$0		\$0		\$0
	ITEM TOTAL				50	\$50,150	\$78,974	\$129,124	

**7 THERMAL & MOISTURE PROTECTION**

<b>072100 Thermal Insulation</b>									
Insulate at laundry units exterior penetrations		2 ea	\$240.00	\$480	\$50.00	\$100			\$580
<b>072500 Weather Barriers</b>	NONE			\$0		\$0			\$0
<b>075300 Elastomeric Membrane Roofing</b>				\$0		\$0			\$0
Roof penetrations for new work	allow	2 ea		\$0	\$2,800.00	\$5,600			\$5,600
<b>078100 Applied Fireproofing</b>				\$0		\$0			\$0
Patch fireproofing where disturbed	allow	1 ls		\$0	\$3,600.00	\$3,600			\$3,600
<b>078400 Firestopping</b>				\$0		\$0			\$0
Firestopping not by trades, labor	allow	64 hrs	\$60.00	\$3,840		\$0			\$3,840
Firestopping not by trades, material	allow	1 ls		\$0	\$2,500.00	\$2,500			\$2,500
<b>079005 Joint Sealers</b>				\$0		\$0			\$0
Pick proof caulking, labor	allow	160 hrs	\$60.00	\$9,600		\$0			\$9,600
Pick proof caulking, material	allow	1 ls		\$0	\$4,000.00	\$4,000			\$4,000
NW03, Pick proof caulking at corner guards	8 ea	\$60.00	\$480	\$40.00	\$320				\$800
				\$0		\$0			\$0
ITEM TOTAL				\$14,400		\$16,120	\$0	\$30,520	

**8 DOORS, WINDOWS & GLASS**

<b>081113 Hollow Metal Doors and Frames</b>									
<b>081416 Flush Wood Doors</b>					\$0		\$0		\$0
Replace stairwell doors for new recessed panics	2 ea	\$464.00	\$928	\$2,500.00	\$5,000				\$5,928
New psych double door opening	2 ea	\$1,920.00	\$3,840	\$3,000.00	\$6,000				\$9,840
New psych single door opening	5 ea	\$960.00	\$4,800	\$3,000.00	\$15,000				\$19,800
New psych window frame	3 ea	\$240.00	\$720	\$400.00	\$1,200				\$1,920
NW15, Psych single door opening	3 ea	\$960.00	\$2,880	\$3,000.00	\$9,000				\$11,880
NW16, Psych patient bathroom door	4 ea	\$960.00	\$3,840	\$3,000.00	\$12,000				\$15,840
NW16, Psych patient door	2 ea	\$960.00	\$1,920	\$3,000.00	\$6,000				\$7,920
Unload, haul, storage	allow	1 ls	\$1,920.00	\$1,920	\$1,500.00	\$1,500			\$3,420
<b>083100 Access Doors &amp; Panels</b>					\$0		\$0		\$0
Phase 1					\$0		\$0		\$0
NW05, Replace ceiling access panel with security type	4 ea	\$360.00	\$1,440	\$220.00	\$880				\$2,320
Phase 2					\$0		\$0		\$0
NW05, Replace ceiling access panel with security type	23 ea	\$360.00	\$8,280	\$220.00	\$5,060				\$13,340
Misc access doors for other work	allow	20 ea	\$360.00	\$7,200	\$220.00	\$4,400			\$11,600
<b>084313 Aluminum Storefronts</b>	NONE			\$0		\$0			\$0
<b>085654 Security Windows</b>	NONE			\$0		\$0			\$0
<b>087100 Door Hardware</b>				\$0		\$0			\$0
Phase 1				\$0		\$0			\$0
NW10, provide new continuous hinge	1 ea	\$696.00	\$696	\$1,200.00	\$1,200				\$1,896
NW11, provide new continuous hinge, lockset, wall stop	2 ea	\$1,392.00	\$2,784	\$1,500.00	\$3,000				\$5,784
Remove rubber stops, fill holes	9 ea	\$240.00	\$2,160	\$75.00	\$675				\$2,835
Phase 2				\$0		\$0			\$0
Replace patient toilet door hardware	12 ea	\$928.00	\$11,136	\$1,500.00	\$18,000				\$29,136
NW09, provide new continuous hinge, lockset, wall stop	20 ea	\$1,392.00	\$27,840	\$1,500.00	\$30,000				\$57,840
NW10, provide new continuous hinge	3 ea	\$696.00	\$2,088	\$1,200.00	\$3,600				\$5,688
NW11, provide new continuous hinge, lockset, wall stop	1 ea	\$1,392.00	\$1,392	\$1,500.00	\$1,500				\$2,892
Remove rubber stops, fill holes	36 ea	\$240.00	\$8,640	\$75.00	\$2,700				\$11,340
Replace stairwell door hardware with new psych panic	allow	2 ea	\$464.00	\$928	\$1,000.00	\$2,000			\$2,928
Replace fasteners for misc items	allow	1 ls		\$0	\$4,000.00	\$4,000			\$4,000
Miscellaneous hardware	allow	1 ls		\$0	\$4,500.00	\$4,500			\$4,500
<b>088000 Glazing</b>				\$0		\$0			\$0
Glass Sub	Royal Glass	1 budget		\$0		\$0			\$10,445
Daisy sliders at temp nurse station	in above	2 ea		\$0		\$0			\$0
Privacy glass, Vistematic at doors	in above	3 ea		\$0		\$0			\$0
Quik-serve sliding windows	in above	2 ea		\$0		\$0			\$0
Tempered laminated glass at BLs	in above	2 ea		\$0		\$0			\$0
Tempered laminated glass at doors	in above	3 ea		\$0		\$0			\$0
Glass film		5 ea		\$0	\$250.00	\$1,250			\$1,250
Miscellaneous glass	allow	1 ls		\$0	\$4,000.00	\$4,000			\$4,000
				\$0		\$0			\$0
ITEM TOTAL				\$95,432		\$142,465	\$10,445	\$248,342	


**RRMC 4th Floor PSIU Mock Survey Renovations DD Budget Estimate REV 1 04.25.19**

Project: RRMC PSIU West and North Wing

Architect: Lavallee Brensinger Architects

printed on 04/25/19

ITEM	DESCRIPTION	QUAN	U/M	UNIT LABOR	LABOR	UNIT MAT'L	MAT	SUB COST	TOTAL
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**9 FINISHES**

<b>092116 Gypsum Board Assemblies</b>					\$0		\$0		\$0
Phase 1					\$0		\$0		\$0
Patch for laundry units	allow	1 ls	\$960.00	\$960	\$450.00	\$450			\$1,410
Wall assembly, psych at Patient rooms, 12' tall		699 sf		\$0	\$22.00	\$15,378			\$15,378
Wall assembly, psych materials, 12' tall		250 sf		\$0	\$22.00	\$5,500			\$5,500
Patch new openings		2 ea	\$960.00	\$1,920	\$450.00	\$900			\$2,820
Gypsum ceilings at patient room		270 sf		\$0	\$24.00	\$6,480			\$6,480
Phase 2		1 ls	\$960.00	\$960	\$450.00	\$450			\$1,410
Wall assembly, psych at Patient rooms, 12' tall		690 sf		\$0	\$22.00	\$15,180			\$15,180
Wall assembly, psych materials, 12' tall		1600 sf		\$0	\$22.00	\$35,200			\$35,200
Gypsum ceilings at patient room		150 sf		\$0	\$24.00	\$3,600			\$3,600
Patch new openings	allow	24 ea	\$960.00	\$23,040	\$450.00	\$10,800			\$33,840
Misc patching	allow	1 ls	\$9,600.00	\$9,600	\$4,500.00	\$4,500			\$14,100
					\$0		\$0		\$0
<b>095100 Acoustical Ceilings</b>					\$0		\$0		\$0
<b>Subcontract Furnish &amp; Install</b>					\$0		\$0		\$0
Security 2x2 metal ceiling system		350 sf		\$0	\$85.00	\$29,750			\$29,750
ACT at Nurse Station		360 sf		\$0	\$7.00	\$2,520			\$2,520
Remove & replace ACT on other floors, labor	allow	40 hrs	\$60.00	\$2,400			\$0		\$2,400
Remove & replace ACT on other floors, material	allow	1 ls		\$0	\$1,500.00	\$1,500			\$1,500
					\$0		\$0		\$0
<b>096500 Resilient Flooring</b>					\$0		\$0		\$0
<b>096800 Carpeting</b>					\$0		\$0		\$0
Phase 1					\$0		\$0		\$0
Patient room vinyl flooring with integral base		620 sf		\$0	\$14.00	\$8,680			\$8,680
Patient toilet room vinyl flooring with integral base		95 sf		\$0	\$14.00	\$1,330			\$1,330
Utility room flooring & base		110 sf		\$0	\$10.00	\$1,100			\$1,100
Phase 2					\$0		\$0		\$0
Corridor vinyl flooring with integral base		1350 sf		\$0	\$14.00	\$18,900			\$18,900
Dictation Forbo carpet with wall base		150 sf		\$0	\$8.00	\$1,200			\$1,200
Med room vinyl flooring with integral base		105 sf		\$0	\$14.00	\$1,470			\$1,470
Patient room vinyl flooring with integral base		150 sf		\$0	\$14.00	\$2,100			\$2,100
Floor prep	allow	1 ls		\$0	\$6,450.00	\$6,450			\$6,450
Slope floor to drain	allow	2 ea		\$0	\$500.00	\$1,000			\$1,000
					\$0		\$0		\$0
<b>099000 Painting and Coating</b>					\$0		\$0		\$0
Phase 1					\$0		\$0		\$0
Paint walls, 9' high		7400 sf		\$0	\$2.00	\$14,800			\$14,800
Paint ceilings		270 sf		\$0	\$2.50	\$675			\$675
Phase 2					\$0		\$0		\$0
Paint walls, 9' high		21600 sf		\$0	\$2.00	\$43,200			\$43,200
Paint ceilings		150 sf		\$0	\$2.50	\$375			\$375
Paint door frames		86 ea		\$0	\$250.00	\$21,500			\$21,500
Miscellaneous painting	allow	1 ls		\$0	\$4,000.00	\$4,000			\$4,000
					\$0		\$0		\$0
<b>ITEM TOTAL:</b>					\$38,880		\$258,988	\$0	\$297,868

**10 SPECIALTIES**

<b>101101 Visual Display Boards</b>	NONE								
<b>101425 Code Required Building Signage</b>	NONE				\$0		\$0		\$0
<b>102601 Wall &amp; Corner Protection</b>					\$0		\$0		\$0
Whiferock wall protection		486 sf		\$0	\$30	\$14,580			\$14,580
<b>Wall protection Sub</b>	Lajeunesse	1 budget		\$0			\$7,025		\$7,025
Handrail, Inpro 800	in above	132 lf		\$0			\$0		\$0
Hardware & lig resis brackets	in above	1 ls		\$0			\$0		\$0
Misc wall protection	allow	1 ls		\$0	\$3,500	\$3,500			\$3,500
<b>102800 Toilet &amp; Healthcare Accessories</b>					\$0		\$0		\$0
<b>Toilet Access Sub</b>	Lajeunesse	1 budget		\$0			\$10,725		\$10,725
New Patient Toilet Rooms					\$0		\$0		\$0
Recessed toilet paper holder	in above	5 ea		\$0			\$0		\$0
Paper towel dispenser, surface	in above	5 ea		\$0			\$0		\$0
Grab bars, anti-ligature	in above	10 ea		\$0			\$0		\$0
Minor, ligature	in above	5 ea		\$0			\$0		\$0
<b>Toilet Access Sub</b>	Lajeunesse	1 budget		\$0			\$5,220		\$5,220
Minor toilet room renovation					\$0		\$0		\$0
Paper towel dispenser, surface	in above	12 ea		\$0			\$0		\$0
<b>Toilet Access Sub</b>	Lajeunesse	1 budget		\$0			\$925		\$925
Mirror half dome, 12x24	in above	2 ea		\$0			\$0		\$0
Robe hooks, item 11A		18 ea	\$45.00	\$810	\$120	\$2,160			\$2,970
Misc toilet accessories	allow	1 ls		\$0	\$2,000	\$2,000			\$2,000
					\$0		\$0		\$0
<b>104400 Fire Protection Specialties</b>					\$0		\$0		\$0
Replace FE cabinets & extinguishers	allow	3 ea	\$480.00	\$1,440	\$550	\$1,650			\$3,090
					\$0		\$0		\$0
<b>105100 Lockers</b>					\$0		\$0		\$0
Re-install visitor lockers		3 ea	\$480.00	\$1,440	\$50	\$150			\$1,590
					\$0		\$0		\$0
<b>ITEM TOTAL:</b>					\$3,690		\$24,040	\$23,895	\$51,625


**RRMC 4th Floor PSIU Mock Survey Renovations DD Budget Estimate REV 1 04.25.19**

Project: RRMC PSIU West and North Wing  
 Architect: Lavallee Brensingier Architects

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ITEM	DESCRIPTION	QUAN	U/M	UNIT LABOR	LABOR	UNIT MAT'L	MAT	SUB COST	TOTAL
<b>11 EQUIPMENT</b>									
110000 Equipment	NONE				\$0		\$0		\$0
ITEM TOTAL					\$0		\$0		\$0
<b>12 FURNISHINGS</b>									
123600 Countertops	Refer to 062000								
ITEM TOTAL					\$0		\$0		\$0
<b>13 SPECIAL CONSTRUCTION</b>									
130000 Special Construction	NONE								
ITEM TOTAL					\$0		\$0		\$0
<b>14 CONVEYING SYSTEMS</b>									
140000 Elevator	NONE				\$0		\$0		\$0
ITEM TOTAL					\$0		\$0		\$0
<b>21 FIRE SUPPRESSION</b>									
210000 Fire Protection									
Sprinkler Sub	Firetech	1	budget		\$0		\$0	<b>\$85,750</b>	\$85,750
Phase 1 trips	in above	10	ea		\$0		\$0		\$0
Design and permit	in above				\$0		\$0		\$0
Replace sprinkler heads with new Tyco Raven	in above				\$0		\$0		\$0
Phase 2 trips	in above	42	ea		\$0		\$0		\$0
Unforeseen sprinkler work	allow	1	is		\$0	\$6,000.00	\$6,000		\$6,000
ITEM TOTAL					\$0		\$0		\$0
<b>22 PLUMBING</b>									
220000 Plumbing	Refer to division 230000								
ITEM TOTAL					\$0		\$0		\$0
<b>23 HEATING, VENTILATING, AND AIR-CONDITIONING (HVAC)</b>									
230000 HVAC									
Mechanical Sub	NEAS	1	budget		\$0		\$0	<b>\$303,000</b>	\$303,000
Enclosure for unit ventilators	in above	20	ea		\$0		\$0		\$0
Minor toilet renovations	in above	12	ea		\$0		\$0		\$0
Replace diffusers with security type	in above				\$0		\$0		\$0
HVAC for patient room & bathroom	allow	5	ea		\$0	\$3,000.00	\$15,000		\$15,000
Unforeseen Plumbing & HVAC	allow	1	is		\$0	\$15,000.00	\$15,000		\$15,000
ITEM TOTAL					\$0		\$0		\$0
<b>25 INTEGRATED AUTOMATION</b>									
250000 HVAC Instrumentation and Controls	Refer to division 23								
ITEM TOTAL					\$0		\$0		\$0


**RRMC 4th Floor PSIU Mock Survey Renovations DD Budget Estimate REV 1 04.25.19**

Project: RRMC PSIU West and North Wing

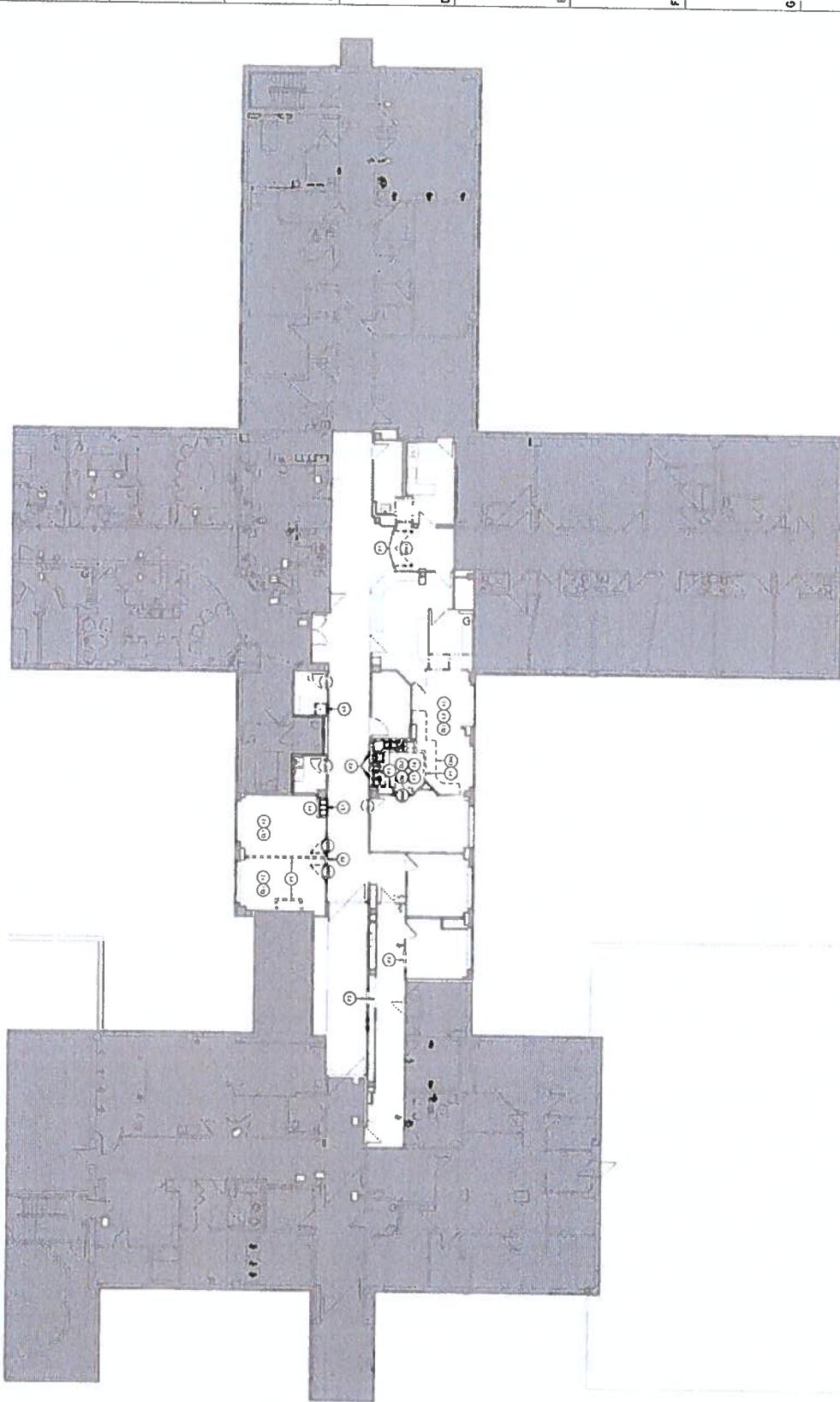
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Architect: Lavallee Brensinger Architects

ITEM	DESCRIPTION	QUAN	U/M	UNIT LABOR	LABOR	UNIT MAT'L	MAT	SUB COST	TOTAL
<b>26 ELECTRICAL</b>									
260000 Electrical									
Electrical Sub	Interstate	1	budget	\$0	\$0	\$0	\$0	\$386,310	\$386,310
Light fixtures & supports	in above			\$0	\$0	\$0	\$0	\$0	\$0
Light fixture branch circuit wiring	in above			\$0	\$0	\$0	\$0	\$0	\$0
Lighting control & occupancy sensors	in above			\$0	\$0	\$0	\$0	\$0	\$0
General use/special devices	in above			\$0	\$0	\$0	\$0	\$0	\$0
Power branch circuit wiring	in above			\$0	\$0	\$0	\$0	\$0	\$0
Mechanical connections & disconnects & branch	in above			\$0	\$0	\$0	\$0	\$0	\$0
Rework existing distribution equipment	in above			\$0	\$0	\$0	\$0	\$0	\$0
Modify existing fire alarm system & branch wiring	in above			\$0	\$0	\$0	\$0	\$0	\$0
Modify existing nurse call & branch wiring	in above			\$0	\$0	\$0	\$0	\$0	\$0
Sound system & branch wiring	in above			\$0	\$0	\$0	\$0	\$0	\$0
Modify existing CCTV system	in above			\$0	\$0	\$0	\$0	\$0	\$0
Telecommunications system empty conduit sleeve	in above			\$0	\$0	\$0	\$0	\$0	\$0
Misc minor materials	in above			\$0	\$0	\$0	\$0	\$0	\$0
Electrical make safe & selective demolition	in above			\$0	\$0	\$0	\$0	\$0	\$0
Testing & commissioning & training	in above			\$0	\$0	\$0	\$0	\$0	\$0
Temporary power and lighting	in above			\$0	\$0	\$0	\$0	\$0	\$0
Storage office trailer rental	in above			\$0	\$0	\$0	\$0	\$0	\$0
Electrical permit fee	in above			\$0	\$0	\$0	\$0	\$0	\$0
As-built drawings	in above			\$0	\$0	\$0	\$0	\$0	\$0
Direct job expense	in above			\$0	\$0	\$0	\$0	\$0	\$0
Overtime allowance	in above			\$0	\$0	\$0	\$0	\$0	\$0
Project supervision	in above			\$0	\$0	\$0	\$0	\$0	\$0
P&P bond	excluded			\$0	\$0	\$0	\$0	\$0	\$0
Unforeseen electrical	allow	1	ls	\$0	\$12,000.00	\$12,000		\$12,000	
Replace code GREY buttons with Psych safe	allow	12	ea	\$0	\$850.00	\$10,200		\$10,200	
Solenoid for bathroom shutoffs	allow	5	ea	\$0	\$1,500.00	\$7,500		\$7,500	
Add psych safe domes to clocks	allow	7	ea	\$0	\$550.00	\$3,850		\$3,850	
				\$0	\$0	\$0		\$0	
<b>ITEM TOTAL</b>				\$0	\$33,550	\$386,310		\$419,860	
<b>27 COMMUNICATIONS</b>									
270000 Communications									
Replace pay phone with Psych safe	allow	3	ea	\$0	\$2,500.00	\$7,500		\$7,500	
				\$0	\$0	\$0		\$0	
<b>ITEM TOTAL</b>				\$0	\$7,500	\$0		\$7,500	
<b>28 ELECTRONIC, SAFETY &amp; SECURITY</b>									
283100 Fire Detection and Alarm									
Access Control Sub	Royal Group	1	budget	\$0	\$0	\$0	\$0	\$52,399	\$52,399
Access control @ doors	in above	8	ea	\$0	\$0	\$0	\$0	\$0	\$0
Video management system	in above	1	ea	\$0	\$0	\$0	\$0	\$0	\$0
Remove & relocate system to temp nurse station	in above	1	ls	\$0	\$0	\$0	\$0	\$0	\$0
Reception video intercom & surveillance	in above	2	ea	\$0	\$0	\$0	\$0	\$0	\$0
Nurse station video intercom & surveillance	in above	2	ea	\$0	\$0	\$0	\$0	\$0	\$0
South wing nurse station video surveillance	in above	1	ea	\$0	\$0	\$0	\$0	\$0	\$0
Electromechanical lockset, & reader at doors	in above	6	ea	\$0	\$0	\$0	\$0	\$0	\$0
West wing video door station, electro lock	in above	1	ea	\$0	\$0	\$0	\$0	\$0	\$0
Elevator to Recap video door station, electro lock	in above	1	ea	\$0	\$0	\$0	\$0	\$0	\$0
Replace card reader with low profile unit	allow	20	ea	\$0	\$514.00	\$10,280		\$10,280	
Provide ceiling dome camera	allow	8	ea	\$0	\$960.00	\$7,680		\$7,680	
Video Intercom Sub	Royal Group	1	budget	\$0	\$0	\$0	\$0	\$20,488	\$20,488
Replace existing video intercom with Aiphone IX	in above	1	ls	\$0	\$0	\$0	\$0	\$0	\$0
Aiphone video door station	in above	14	ea	\$0	\$0	\$0	\$0	\$0	\$0
Aiphone video master station	in above	2	ea	\$0	\$0	\$0	\$0	\$0	\$0
Aiphone relay adapter	in above	2	ea	\$0	\$0	\$0	\$0	\$0	\$0
D-link PoE switch	in above	1	ls	\$0	\$0	\$0	\$0	\$0	\$0
Replace fire alarm devices with psych safe, item #4	allow	45	ea	\$0	\$350.00	\$15,750		\$15,750	
				\$0	\$0	\$0		\$0	
<b>ITEM TOTAL</b>				\$0	\$33,710	\$72,865		\$106,575	
<b>31 EARTHWORK</b>									
312256 Foundation Related Earthwork	NONE								
<b>ITEM TOTAL</b>				\$0	\$0	\$0		\$0	
<b>32 EXTERIOR IMPROVEMENTS</b>									
320000 Exterior Improvements	NONE								
<b>ITEM TOTAL</b>				\$0	\$0	\$0		\$0	
<b>33 UTILITIES</b>									
330000 Utilities	NONE								
<b>ITEM TOTAL</b>				\$0	\$0	\$0		\$0	

4th Floor Inpatient



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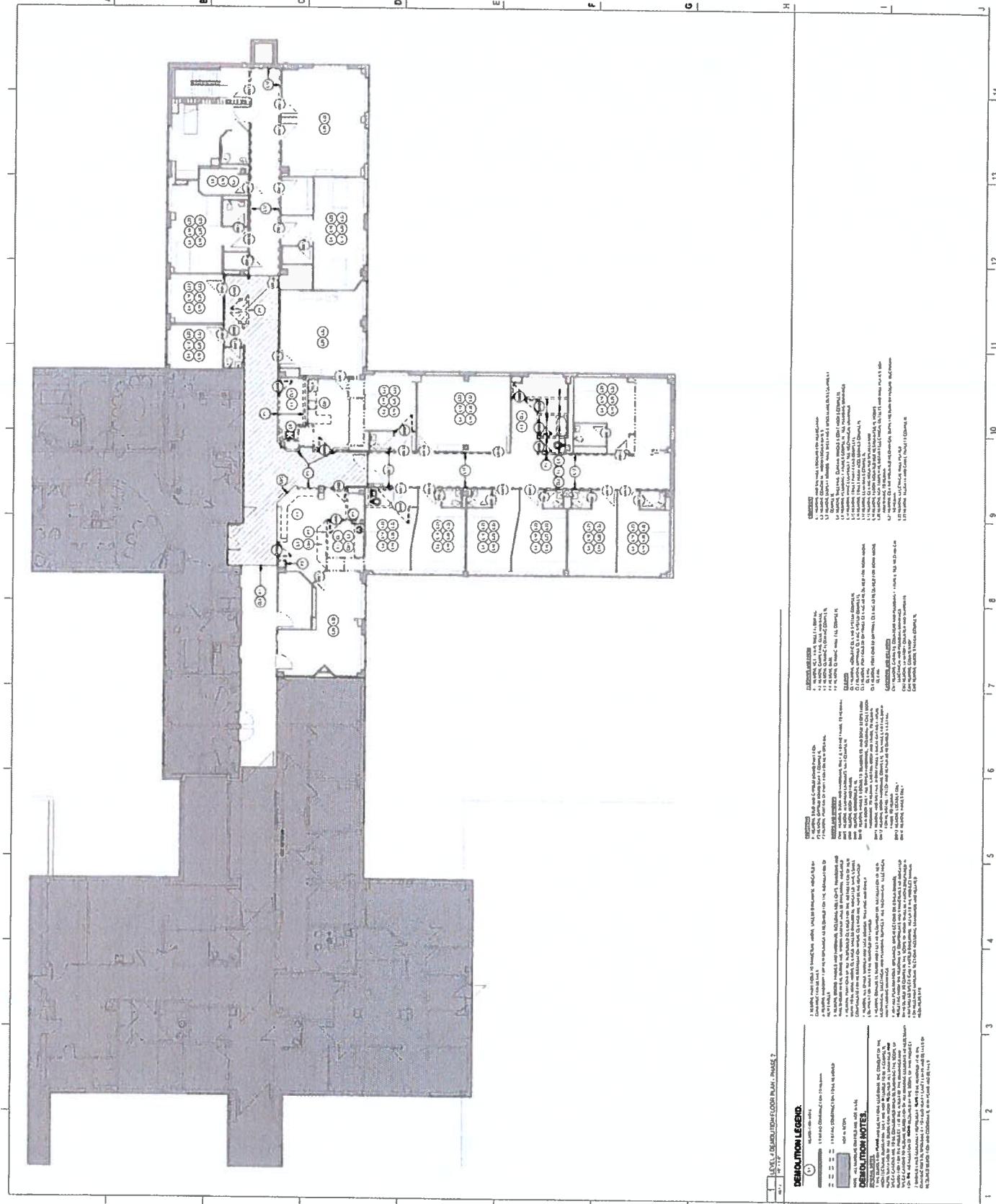
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4th Floor Inpatients

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**RRMC - 4th Floor Psychiatric Unit Assessment**
**LAVALLEE | BRENSINGER ARCHITECTS**
**EXHIBIT C**

ITEM	LOCATION	DESCRIPTION	TIMEFRAME	REMARKS	IN PROJECT (Y/N)
1	General	Remove rubber silencers from door frames		Ingestion risk	Y
2	General	Replace spanner screws with pin-and-torx screws		Patients can remove spanner type	Y
3	General	Replace door locksets with BH grade version		Ligature risk; Review on case-by-case basis	Y
4	General	Replace deadbolts with BH grade version		Ligature risk	Y
5	General	Replace hinges with BH grade version		Ligature risk	Y
6	General	Remove existing exterior windows and replace with BH grade units		OTHER PROJECT CURRENTLY IN WORKS	N
7	General	Remove & replace / modify existing unit ventilators to make BH safe		Ligature / Ingestion / Weaponization risk	Y
8	General	Replace door stops with BH grade stops		Risk of weaponization	Y
9	General	Replace sprinkler heads with Tycho Raven heads		Ligature & tampering risk	Y
10	Corridor	Add convex security mirror at blind spots in corridors to improve visibility (by showers)		Staff Safety Risk	Y
11	Intake	Relocate bottled gases to staff only area		Risk of Weaponization	Y
12	Nurse Station	Remove thumbtacks from tack panels		Ingestion / Weaponization risk	Y
13	Nurse Station	Conceal computer screens from patients' view		HIPAA concern; weaponization concern; can be resolved as part of nurse station relocation	Y
14	Nurse Station	Modify/Relocate nurse station layout to improve visibility of the unit		Staff / Patient Safety risk	Y
15	Nutrition	Conceal sink piping		Ligature Risk; Resolved as part of nurse station relocation	Y
16	Nutrition	Replace cabinet pulls with ligature resistant ones		Ligature Risk; Resolved as part of nurse station relocation	Y
17	Patient Rooms	Remove floor eyebolts		Ligature risk (crocodile roll)	Y
18	Patient Rooms	Replace hospital style beds and replace with fixed platform beds		Patient safety risk	Y
19	Patient Rooms	Replace electrical outlets with tamper-resistant outlets		Ligature risk	Y
20	Patient Shower	Replace mechanical supply/exhaust grille with BH version		Ligature risk	Y
21	Patient Toilets	Replace plumbing fixtures with BH grade fixtures		Staff/Patient safety risk	Y
22	Corridor	Eliminate hidden alcove in West wing		Risk of weaponization	Y
23	General	Add pick proof sealant to cove cap (integral base)		Ligature & tampering risk	Y
24	General	Replace wall plate covers with BH grade		Risk of weaponization; Resolved as part of nurse station relocation	Y
25	Intake	Replace adjustable wall shelving with fixed BH appropriate shelving		Ligature Risk; Resolved as part of nurse station relocation	Y
26	Kitchen	Replace cabinet locks with ligature resistant ones		Ligature risk and contraband concealment space; Resolved as part of nurse station relocation	Y
27	Kitchen	Make soda/ice machine BH safe		Ligature risk; Resolved as part of nurse station relocation	Y
28	Nurse Station	Replace gate closer with spring hinge		Ligature & tampering risk	Y
29	Nutrition	Install valance over wall cabinets		Ligature & tampering risk	Y
30	Nutrition	Replace cabinet locks with ligature resistant ones		Ligature & tampering risk	Y
31	Patient Rooms	Remove / protect medical gas connections		Ligature & weaponization risk	N
32	Patient Rooms	Remove tel/data/cable outlets		Tampering and weaponization risk	V/N
33	General	Replace hazardous furniture with BH appropriate furniture (Review on case-by-case basis)		Tampering risk	Y
34	Corridor	Replace Corridor Ceilings		Ligature risk	Y
35	General	Replace ceiling access panels with security grade panels			
36	General	Remove tension style robe hooks and replace with Kingsway Coat hook (KG180)			

## RRMC - 4th Floor Psychiatric Unit Assessment

LAVALLEE | BRENSINGER ARCHITECTS

ITEM	LOCATION	DESCRIPTION	TIMEFRAME	REMARKS
37	General	Seal wall corner guards to lock the parts into place	IN PROJECT (Y/N)	Ligature / Ingestion / Weaponization risk
38	Kitchen	Make dumbwaiter hardware BH safe		Y
39	Nutriton	Replace exhaust hood with code compliant one		
40	Patient Rooms	Replace privacy curtains with BH grade curtains		RESOLVED BY NURSE STATION RENOVATIONS
41	Patient Shower	Replace shower heads with recommended head (Intersan 40631)		N BY OWNER
42	Patient Shower	Remove ceramic wall tile; replace with paint or impact resistant sheet product		
43	Patient Shower	Remove ceramic floor tile; replace with sheet vinyl		
44	Patient Shower	Replace mirrors with BH grade version		
45	Patient Toilets	Remove ceramic wall tile from bathrooms; replace with paint or impact resistant sheet product		
46	Patient Toilets	Remove ceramic floor tile from bathrooms; replace with sheet vinyl		
47	Corridor	Replace Corridor Bumper Rails		
48	Corridor	Replace wall mounted fire alarm devices with BH appropriate ceiling mounted ones		
49	General	Replace locatable switch covers with a keyed switch		
50	Patient Rooms	Replace wicket doors with standard doors with double swing hinges and removable stops		
51	Patient Rooms	Remove privacy curtains tracks completely (if converting to private rooms)		
52	Patient Rooms	Replace shelf/coat hook unit and replace with more appropriate unit		
53	Patient Rooms	Replace surface mounted speakers with recessed unit		
54	Patient Shower	Replace grab bars with recommended Kingsway grab bars (KG270)		
55	Patient Toilets	Replace grab bars with recommended Kingsway grab bars (KG270)		
56	Patient Toilets	Replace TP dispensers with recommended Intersan surface mounted holder (TRH02)		

### TIMEFRAME LEGEND

Highly recommended that these items should be addressed immediately. Item poses an immediate safety risk to patients / staff visitors. CMS citation risk is very high
Recommended that these items should be addressed as soon as financially possible. Item poses an substantial safety risk to patients / staff / visitors. CMS citation risk is medium-to-high
Considered BH "Best Practice", but can be deferred as time/budget allows. Includes BH products that have been found to pose a potential safety risk to patients. CMS citation risk is low-to-medium
Recommended that Owner review these items as part of their Risk Assessment to determine need. CMS citation risk is low.