

Green Mountain Care Board
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DELIVERED ELECTRONICALLY

December 5, 2019

Mr. William Cats-Baril, PhD
Silver Pines Partners, LLC
P.O. Box 161
Charlotte, VT 05445

RE: Docket No. GMCB-016-19con, Proposed Development of Medically Supervised Withdrawal Treatment Center for Substance Use Disorder in Stowe.

Dear Mr. Cats-Baril:

Thank you for the application for the above referenced project. Pursuant to GMCB Rule 4.302, please provide the following additional information:

Utilization and Staffing

1. The application states on page 12 that a number of Vermonters currently get treatment out of state due to a preference for a customized approach with a high clinical provider-to-patient ratio. Please provide data to support this statement.
2. The application states on page 24 that the number of Vermont residents seeking treatment at Silver Pines will be limited because the facility will not be contracting with Medicaid or Medicare. In a table format, provide the total projected number of individuals to be admitted to Silver Pines in Years 1, 2 and 3 of operation; the number/percent that are expected to be Vermont residents; and the number/percent that are expected to be out-of-state residents.
3. The application states on pages 16 and 21 that the facility will have the highest staff-to-patient ratio in the state. The application also states on page 5 that Silver Pines proposes to offer one of the highest clinical staff-to-patient ratios in the country. Please provide support for these assertions and describe the projected clinical staff-to-patient ratios at Silver Pines for Years 1, 2, and 3 of operation (which should correspond to the staffing and utilization tables submitted as part of the application). Please also describe how these projected ratios compare to other comparable facilities and specify the facility(s).
4. Provide detailed information on how and where staff will be recruited.



5. On page 2 of the Lease, please identify and describe the positions to be held by non-U.S. residents through the H2B program and J-1 Visa programs. Explain the potential impact on the project if these positions cannot be filled by non-resident workers.
6. Specify the qualifications for the Aftercare Specialists and the Recovery Specialists positions.
7. Provide more detailed information about the “medically intensive treatment” to be provided by the Medical Assistants and the qualifications required for this position.

Clinical Programming

8. Provide a detailed description of the medical, clinical and adjunct services to be integrated into each episode of treatment. Beginning with programming for the first hour of an individual’s day through the last hour, outline what a typical day in treatment will include, clearly identifying the number of hours of clinical services, medical services, and all other services to be provided on and off site each day.
9. The application states on page 6 that whereas the current paradigm in addition treatment leads to variable results and frequent relapses, the model that will be offered at Silver Pines will lead to better outcomes in terms of increased abstinence and decreased relapse rates, which will in turn yield cost savings for the healthcare system through, for example, potentially fewer emergency department visits. Please provide support for the assertion that the model of care offered at Silver Pines leads to better outcomes in terms of increased abstinence and decreased relapse rates.
10. Detail the withdrawal management protocols for each substance addressed at Silver Pines.
11. Explain how toxicology testing will be provided.
12. Explain in further detail the proprietary, neural network-based treatment planning algorithms using machine-learning principles and the evidence-base for the algorithm. Provide articles from peer reviewed journals that support it’s efficacy. Explain whether any of the investors/owners of Silver Pines Partners, LLC have an interest in the proprietary neural-network algorithm.
13. The application states on page 21 that Silver Pines will recruit patients throughout Vermont, the Northeast, the Midwest of the U.S. and Quebec, Canada. Given the expansive area from which patients will be recruited, explain in detail how Silver Pines will manage aftercare planning during and after a patient’s stay at Silver Pines, specify the period of time Silver Pines will manage aftercare and follow-up activities, and describe the means by which Silver Pines will carry out these activities.
14. Provide a detailed explanation of aftercare coordination, including specificity on the reintegration of patients who are Vermont residents into the Substance Use Disorder (SUD) system of care in Vermont and the reintegration of patients who are not Vermont residents. Explain in detail how Silver Pines will ensure that clients will continue treatment in the larger system of care following discharge from Silver Pines’ withdrawal management program.



15. What is the expected average length of stay overall and for each substance to be treated for individuals seeking treatment at Silver Pines? Specify how each length of stay was determined for each substance.
16. Explain in detail the tapering plan for each population/substance and the efficacy of such plans relative to the incidence of relapse and/or adverse health events.
17. The application states on page 27 that individuals will have access to a Registered Dietician. However, the staff list does not list this position and it is not clear that it will be a contracted service. Please explain. Also clarify whether the cost for this position or service is reflected in the total annual operating expenses and financial tables submitted.
18. The application states on page 38: “We will also provide access to qualified mental health professionals.” Please explain in more detail, including whether such professionals will be located on or off site, and whether the cost to access these professionals is included or excluded in the residential cost of care.
19. The application states on page 39 that individuals will have an appointment with PCPs upon discharge. Please explain in detail how this will work for in-state and out-of-state residents who seek treatment at Silver Pines.
20. The application states on page 24 that Silver Pines will provide data to the Department of Mental Health (DMH). Please identify and explain in detail the data that will be provided to DMH and how frequently and over what period of time such data will be provided.

Community/System of Care Integration

21. Provide with specificity how Silver Pines will integrate into: (a) the Vermont SUD system of care and (b) the SUD systems of care in other states for non-residents. Explain Silver Pines’ connections to the Vermont Preferred Provider Network and such networks in other states.
22. Do you expect out-of-state residents seeking care at Silver Pines to require services from Vermont’s community/system of care following discharge? If so, quantify how this will impact Vermont’s community system of care.
23. Provide a detailed description about all proprietary and non-proprietary technologies and processes proposed for outreach for patients’ post-discharge. Explain in detail what the outreach entails, the timelines of the outreach and how the outreach interacts with and/or replaces on-going treatment post-discharge from Silver Pines. Identify whether any of the owners/investors of Silver Pines Partners, LLC have an interest in each of the proprietary technologies and processes to be employed.
24. Provide detailed information on the computing platform referenced on page 34 of the application and how Silver Pines will systematically collect, analyze and track all outcome measures noted on page 29 and specify the period of time such data will be collected and tracked for each individual who has sought treatment at Silver Pines. Specifically address how each of these data will be used to inform and continuously improve programming and protocols.



25. Explain in detail the contact you have had with Copley Hospital and local EMS services to date and the nature of the relationships you intend to establish with these entities. Explain the annual projected volume that could be generated for both services, how that volume was calculated, and whether each entity has determined they have sufficient capacity to provide such services.
26. Provide more detailed information on the anticipated referral sources and referral process for Vermont residents and non-Vermont residents to access services at Silver Pines.
27. Explain in detail how and with whom Silver Pines will collaborate with and financially contribute (specify the dollar-amount range of contributions) to local addiction community resources and supports. Clarify whether this expense is reflected in the annual operating expenses and financial tables submitted.

Financial

28. Submit a balance sheet with proposed years 1, 2 and 3 in a standard spreadsheet format.
29. Gross revenue is included, but deductions from revenue and net revenue are not. Include a breakdown of deductions from revenue at the annual level.
30. Provide a breakdown at an annual level of revenue (gross, deductions, and net) by payer.

Other

31. The application states on page 12: “Currently in Vermont, there is only one ASAM 3.7-level facility located in the southern part of the state, and individuals in need of such services outside of that area are using Emergency Departments (EDs) and inpatient hospitalization at a significant cost.” Provide the data source(s) and information that supports this assertion.
32. The application states on page 30: “Silver Pines anticipates reducing the overall healthcare costs in Vermont and across the nation by serving people who are currently using ambulatory and emergency services often followed by inpatient hospital admission.” Provide the data source(s) and information that supports this assertion.
33. The application states on page 29: “To provide and ensure the highest standards of care at Silver Pines, we will systematically track outcomes measures, such as treatment initiation, treatment retention, successful completion of program, rates of abstinence and substance use reduction, aftercare follow-up, client satisfaction, and a reduction in ED visits and hospital admissions.” Explain the duration of collection and analysis and specify how Silver Pines will collect data in each of these areas.
34. Explain the contact you have had with the Vermont Division of Licensing and Protection for the licensure of the 32 beds at Silver Pines.
35. Provide copies of Exhibit A and B that are referenced on page 1 of the Lease.



36. Identify and describe the electronic health record (EHR) system you plan to use at Silver Pines and cost associated with the system and whether the cost for the EHR system is included in the annual operating expenses and financial tables submitted.

Reimbursement

37. Explain whether all services provided to individuals admitted to Silver Pines will be included in the residential rates to be charged. In a table format, list all services that will be billed and included in the residential rate and to whom they will be billed and a list of all services that will be billed outside the residential rate and to whom they will be billed, including transportation and all other services.

In responding, restate the question in bold font and respond in unbolded font. Send an electronic copy to me at donna.jerry@vermont.gov and one hard copy (three-hole punched) with a Verification Under Oath to my attention at the Green Mountain Care Board, 144 State Street, Montpelier, Vermont 05602.

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

Sincerely,

s/ Donna Jerry

Donna Jerry

Senior Health Policy Analyst

cc. Michael Barber, General Counsel
Green Mountain Care Board

