

Green Mountain Care Board
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DELIVERED ELECTRONICALLY

January 6, 2020

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 your responses to the first set of questions for the above-referenced project. Please provide the following additional information and clarifications:

1. Provide a full copy of any market study or feasibility analysis that has been performed for this project.
2. Provide any articles from peer reviewed journals that support the efficacy of seven- to ten-day supervised substance use withdrawal programs, with or without remote follow-up after discharge.
3. Provide additional information on the neural network treatment planning model and algorithm:
 - a. On page 15 of the Responses to Questions (Dec. 17, 2019), question 12, you state that “machine learning and neural network models have been used with success in many areas of medicine” and specifically note that have been used “to successfully develop a model to stratify patients by risk of imminent suicide.” Have the algorithms you have developed been tested for use in the patient population you will be serving? Is there any literature or evidence regarding the effectiveness of using machine learning and neural networks in the treatment of individuals with substance use disorders? If so, please provide.
 - b. What types of data inputs are needed for this algorithm (e.g., past treatment history for substance use disorder, social determinants of health, and income and demographic information)? Provide more detail regarding how you plan to obtain this information for patients receiving treatment at Silver Pines.



- c. On page 15 of the Responses to Questions (Dec. 17, 2019), question 12, you state that the proprietary algorithm will be used to guide and augment clinical decisions at Silver Pines and, as individuals complete the program, you will track outcomes and add patients' experience to the algorithm to enhance the consistency of decision-making and care across all health care professionals and staff at Silver Pines. Will the algorithms be used only to guide clinical decisions at Silver Pines, or will they also be used to develop a treatment plan for patients after discharge from Silver Pines? Please explain in more detail.
4. The application states on page 15 that the Medical Director will have expertise in treating addiction. Please explain in more detail what addiction treatment expertise the Medical Director will have. Please also specify whether the Medical Director and the MDs on staff will be psychiatrists and whether they will be ABAM certified.
5. The application states on page 38 that Silver Pines will also provide access to qualified mental health professionals. Explain in detail where such professionals will be located and identify licensure that will be required such as LCMHC, LICSW, PhD etc.
6. Page 2 of the lease states: "In the event that either of the federal H2B Program or J-1 Visa Program are terminated and not replaced with programs providing Tenant with similar opportunities to employ non-resident workers, then Tenant may terminate this lease by providing the Landlord with no less than six (6) months prior written notice." In a table format, specify the title and projected number of staff (FTE) to be hired through each of these two Visa programs in year 1, year 2, and year 3 of the project.
7. On page 15 of the Responses to Questions (Dec. 17, 2019), question 12, you cite the SERAS model. Please clarify whether this model will be utilized at Silver Pines, or whether this was provided as an example of the power of machine learning and neural-network models generally.
8. Provide an update on where Silver Pines is in any Town of Stowe and/or state review process.
9. Submit full resumes for all staff known at this time.
10. The application states that Silver Pines will provide data to the Department of Mental Health. Please clarify whether you meant Vermont Division of Alcohol and Drug Abuse Programs (ADAP).
11. Provide a balance sheet with proposed year 1, 2 and 3 projections in a standard spreadsheet format. Projections for years 1, 2 and 3 are required.
12. Gross revenue is included in the financial tables, but deductions from revenue and net revenue are not. It is typically expected that some level of bad debt will occur. Please explain in more detail why you are certain there will be no bad debt and, if necessary, revise the revenue projections to reflect a reasonable level of bad debt.
13. Clarify whether the financial tables reflect negotiated reimbursements from commercial payers or reflect Silver Pine's full charge and the expectation that commercial payers will pay that amount.



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

