

Donna Jerry, Senior Health Policy Analyst
Green Mountain Care Board
114 State Street
Montpelier, VT 05620

Dear Ms. Jerry,

This letter serves as a Letter of Intent to apply for a Certificate of Need to provide residential SUD treatment in Ludlow, Vermont.

Description Organizations Involved

A partnership has been formed between The Divided Sky Foundation and Ascension Recovery Services (Ascension RS) to develop a treatment center in Vermont that can serve anyone in need of quality, evidence-based, co-occurring SUD and mental health treatment. The Divided Sky Foundation is a 501(c)(3) non-profit corporation that will provide long-term residential addiction treatment in Ludlow, Vermont. Ascension RS is the industry leader in developing and managing comprehensive, fully integrated behavioral health systems, treating SUD and mental illness across the full continuum of care. Our focus is to provide innovative solutions, utilizing evidence-based and promising practices, that deliver high-quality clinical care for treating and managing addiction as a chronic disease, for all who need care, regardless of insurance or ability to pay. Ascension RS works with leading behavioral health providers and hospital systems across the country and is even developing the world's largest and most comprehensive recovery campus for the City of Boston, on Long Island in Boston Harbor. The Divided Sky Foundation is a newly formed non-profit for the purpose of offering premier evidence-based behavioral health treatment for people with SUD and co-occurring mental health disorders. The building at 262 Fox Lane, Ludlow, Vermont will be purchased and owned by Ryker Douglas, LLC, a commercial property development company. Ryker Douglas, LLC will lease the building to The Divided Sky Foundation over a period of 30 years.

Description of the Proposed Treatment Center

The residential treatment center will be operated at 262 Fox Lane, Ludlow, Vermont. The program will operate with 40 beds at maximum capacity. 30 of these beds will be for residential treatment, and 10 beds will be used for initial stabilization and withdrawal management. The Divided Sky Foundation will seek to license 40 beds as therapeutic community residence beds through the Agency of Human Services' Department of Disabilities, Aging, and Independent Living's Division of Licensing and Protection. This treatment center will serve people with co-occurring SUD and mental health disorders and will include a track for people who are justice-system involved and need treatment as part of their reintegration into the community. The mission is to provide the highest quality SUD and mental health disorder treatment for anyone in need.

The following services will be provided: 1) stabilization and withdrawal management, 2) residential treatment for SUD and mental health disorders, and 3) aftercare individual and group counseling. The Divided Sky treatment center will use premier evidence-based treatment including, but not limited to, Acceptance and Commitment Therapy and Dialectical Behavior

Therapy, in addition to Medication-Assisted Treatment. The service area will primarily focus on the state of Vermont but could include referral sources from other areas of the country as well. The goal is to be able to serve people with any payer source, whether private or public insurance, in addition to people who are uninsured or underinsured.

Table 1. provides a summary of services offered, staffing necessary, and location of services provided¹.

Table 1.

Service Provided	Key Position	Level of Provider	Full-Time Equivalent	Provided Onsite or Offsite
Stabilization/Withdrawal Management (including MAT)	Medical Director/Provider	MD, NP, or PA	.5	Onsite
	Drug and Alcohol Counselor	ADC, LADC, LCMHC, or LICSW	1.5	Onsite
	Drug and Alcohol Technician	BA, BS, BSW	1.5	Onsite
Residential Treatment for Substance Use and Mental Health Disorders (including MAT)	Clinical Program Director	Masters Level Independently Licensed	1	Onsite
	Medical Director/Provider	MD, NP, or PA	.5	Onsite
	Drug and Alcohol Counselor	ADC, LADC, LCMHC, or LICSW	5.5	Onsite
	Drug and Alcohol Technician (Peer Recovery)	Peer Recovery Support Specialist and/or BA, BS, BSW	13.5	Onsite
Aftercare Individual Counseling and Group			2.8	Onsite

¹ Staffing model shows critical staff and FTE's but is not a comprehensive staffing model; other positions are included in the staffing model.

Counseling (through utilization of HIPAA-compliant telehealth technology)	Drug and Alcohol Counselor	ADC, LADC, LCMHC, LICSW		
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The plan is to recruit staff from Vermont as much as possible but with a willingness to seek staff from other areas depending on availability of applicants within Vermont and position seeking applicants.

The length of the program for each participant will vary depending on the needs of each client. A reasonable estimation would be one week in stabilization/withdrawal management, at least one month in residential treatment, and aftercare for, on average, up to 10 sessions following treatment. The length of aftercare provided by will be individualized. The purpose of the aftercare will be to assist clients through the critical and potentially vulnerable time period following treatment and transitioning into their local communities and recovery systems. The Divided Sky residential treatment center will seek to become fully accredited by CARF. The goal would be to open the treatment center by the end of 2021, with renovations beginning toward the end of 2020.

Estimated Cost of the Project

Pre-opening costs are expected to be about \$675,500. Estimated in these pre-opening costs are operational and facility supplies, a transport van, residential facility utilities, design and development fee, and other administrative line items. The purchase was initiated roughly 15 weeks ago. As of the date of this letter, the property is in the process of being purchased. The building was purchased for \$1,700,000 and we plan on renovating and updating the property in an amount up to \$1,300,000. Year 1 operating costs are expected to be \$5,057,094. Year 2 operating costs are expected to be \$5,449,279. Year 3 operating costs are expected to be \$5,971,319.

Respectfully,

J. Matt Boggs

J. Matt Boggs (Oct 23, 2020 15:43 EDT)

J. Matthew Boggs

CEO

Ryker Douglas

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Steve Burton

Steve Burton

Director – Program Development

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