



Recovery House, Inc.

P.O. Box 207

Wallingford, Vermont 05773 – 0207

www.recoveryhousevt.org

May 21, 2021

Donna Jerry
Green Mountain Care Board
144 State St., Montpelier, VT 05602

Dear Ms. Jerry,

Please be informed that Recovery House, Inc. (dba Serenity House) hereby requests interested Party status in the certificate of need (CON) application filed by Divided Sky Foundation, with Ascension Recovery Services, docket number GMCB-006-029.

Recovery House operates 34 ASAM Level 3.7/3.5 patient beds at our Wallingford, VT location: Serenity House. An additional 10 ASAM Level 3.1 patient beds operate out of our Rutland, VT location: Grace House. We currently represent 44 out of the state's 143 inpatient, residential substance use disorder beds. At Serenity House, we average approximately 92% Medicaid clients, with around a 50% utilization rate over the past year. This, combined with our most recent admissions "wait" time of approximately 5 days, it is clear that there is no need for 40 additional substance use disorder treatment beds at the 3.7/3.5 ASAM Level.

Additionally, Vermont Department of Health, Office of Alcohol and Drug Abuse Programs release data for FY19 (October 2020), demonstrating residential utilization at approximately 58% (based on 133 3.7/3.1 beds, with average length of stay at 15 days). This utilization suggests that an additional 40 beds in the residential system of care poses multiple risks, including financial stability and staffing shortages.

In Divided Sky's GMCB CON application, they note treatment availability as their primary rationale for opening. As discussed above, treatment remains available. Although we may not be in Windsor county, Recovery House serves all Vermonters, including the residents of Windsor county – in fact, Serenity House is located 20 minutes away from Divided Sky's proposed location.

Serenity House

98 Church St.
Wallingford, VT 05773-0207
Phone – 802.446.2640
Fax – 802.446.2636

Grace House

35 Washington St.
Rutland, VT 05701-5029
Phone – 802.775.3476
Fax – 802.775.2984

Regarding staffing, this Divided Sky/Ascension Recovery program runs the risk of furthering the workforce development crisis in the field of substance use treatment in the state of Vermont. Currently, Vermont is experiencing a nursing shortage, as well as a shortage of trained and licensed alcohol and drug counselors. Their requested staffing patterns will undoubtedly take professional staff away from other agencies in the field. With Serenity House being 20 minutes away, the risk of experiencing such a staffing situation is great – presenting workforce sustainability issues for providers.

Anecdotally, individuals have expressed difficulty accessing treatment over the past year. These comments do not validate a need for additional treatment beds. Due to COVID-19, there have been additional admission items, such as COVID testing and/or quarantine requirements over the past year, but these potential delays will not continue forever.

It is for these reasons, the potential impact on Recovery House, Inc. and substance use system of care, that we are requesting interested party status.

Thank you for your consideration of this request.

Respectfully,

A handwritten signature in black ink, appearing to read "Chadd Viger", with the initials "MS, LADC" written below it.

Chadd Viger, MS, LADC
Chief Executive Officer
Recovery House, Inc.