
DELIVERED ELECTRONICALLY

December 8, 2021

Mr. Nick Kahm, Managing Partner
The Kahm Clinic
70 S. Winooski Ave, Suite 2C
Burlington, VT 05445

RE: Docket No. GMCB-009-21con, The Kahm Clinic, Eating Disorder Treatment Program

Dear Mr. Kahm:

Thank you for your application to develop an Intensive Outpatient Program and a Partial Hospitalization Program for treatment of eating disorders at the existing Kahm Clinic. At this time, please provide the following information:

Financial

1. Provide a detailed spreadsheet reflecting all annual operating expenses for proposed year 1 (which must include all start-up costs); proposed year 2; proposed year 3; and proposed year 4 specifying the 12-month period covered in each of the four years. The spreadsheet must show all line items required to make what you are proposing fully operational, including all staff and fringe, any payment of salaries to the owners/partners, equipment leases, electronic medical record and on-going associated costs, also any withdrawals to the owners for reimbursement of working capital and any dividends, etc. All costs to make the proposed project fully operational in years 1, 2 and 3 must be included in the annual operating expenses for each year.
2. Per the applicant, commercial payers will reimburse at 95% of charge. Explain your expectation for reimbursement from self-pay patients and explain in detail your pro bono policy and where is it accounted for in Tables 3 and 6 A, B and C.
3. Provide a detailed spreadsheet reflecting all annual capitalized costs for proposed year 1 (which must include all start-up costs); proposed year 2; proposed year 3; and proposed year 4, specifying the 12-month period covered in each of the four years.



4. Page 8-9: Explain in detail why the program you are proposing does not anticipate participating in Medicaid.
5. Page 16: Under CON Standard 3.22, explain in detail the equipment lease arrangement and the space rental exchange for the use of the two pieces of equipment that is noted.
6. Explain in detail, the ownership, rental and/or lease arrangement of the space to be used by the proposed IOP and PHP programs at the Kahm Clinic and the interrelationship between the services currently provided by the existing Kahm Clinic and the IOP and PHP programs to be added.
7. Explain in detail what the fit-up of the space for the Kahm Clinic will entail including all fit-up, renovation and any construction (if any). Provide more detail on the specific energy efficiency measures that will be included in the fit-up of the space used by the IOP and PHP programs at the Kahm Clinic and confirm whether you have consulted and are working with Efficiency Vermont. In addition, clarify whether there is any renovation and/or construction, involved in the space to be used by the Kahm Clinic. If yes, CON Standard 1.10, 1.11 and 1.12 must be addressed in full. For your convenience, these standards are noted below.

CON STANDARD 1.10: Applicants proposing new health care projects requiring construction shall show such projects are energy efficient. As appropriate, applicants shall show that Efficiency Vermont, or an organization with similar expertise, has been consulted on the proposal.

CON STANDARD 1.11: Applicants proposing new health care projects requiring new construction shall demonstrate that new construction is the more appropriate alternative when compared to renovation.

CON STANDARD 1.12: New construction health care projects shall comply with the Guidelines for Design and Construction of Health Care Facilities as issued by the Facility Guidelines Institute (FGI), current edition. See Bulletin 001 for CON on GMCB website.

Program

8. Provide more detailed information for the electronic medical record you plan to use for the IOP and the PHP programs. Describe in detail if and how the Kalm Clinic's electronic medical record plans to electronically exchange health records (interoperability with the Vermont Information Exchange System (HIE) with other providers outside your clinic and how you will access records of their patients to support care delivery of patients at the Kalm Clinic.



9. Address in detail CON STANDARD 4.5 which states: **To the extent possible, an applicant seeking to implement a new health care project shall ensure that such project supports further integration of mental health, substance use disorder and other health care.**
10. Page 12: It is stated that the Kahm Clinic plans to collaborate with providers that treat typical eating disorder comorbidities such as trauma and substance abuse. Please identify the specific providers and organizations you plan to collaborate with and explain in detail the nature of such collaborations.
11. Explain in detail the Kahm Clinic's plan for discharge planning and how individuals will be connected with the range of services and supports individuals will need following treatment at the Kahm Clinic.
12. Page 13: Explain in detail the large searchable dataset that will help the Kahm Clinic to continually improve their treatment methodology. Provide specific examples.
13. Page 14: As you are aware Vermont facilities and programs are experiencing staffing challenges. Explain in more detail your plan for successfully recruiting a 0.5 FTE medical director, 1 FTE clinical/program director, 3 FTE therapists, 2 FTE Nutritionists. Explain the impact on your proposed program and your contingency plan if you are not able to recruit each level of provider at the FTE level represented.
14. Restate and provide a more detailed response demonstrating that the proposed project meets statutory criteria 1-5, 7 and 9. (For your convenience, the statutory criteria is attached in a separate Word document in the email that included this set of questions.)
15. Restate each triple aim and provide a more detailed response to each demonstrating how the proposed project addresses each aim. For your convenience, the Triple Aims are noted below.

Triple Aims: Institute of Healthcare Improvement (IHI), Triple Aims: Explain how your project is:

- (a) improving the individual experience of care;**
- (b) improving health of populations;**
- (c) reducing the per capita costs of care for populations.**

16. As a comparison, provide a sample daily treatment schedule recommended by national models to treat eating disorders for IOP and PHP programs.

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 802-760-8162.

Sincerely,

s/ Donna Jerry

Senior Health Policy Analyst
Green Mountain Care Board

cc. Laura Beliveau
Staff Attorney

