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March 24, 2022

**SENT ELECTRONICALLY** - *donna.jerry@vermont.gov*

Donna Jerry  
Senior Health Policy Analyst  
Green Mountain Care Board  
144 State Street  
Montpelier, VT 05602

**Re: Docket No. GMCB-018-21con  
Rutland Regional Medical Center Temporary Use of Mobile MRI**

Dear Ms. Jerry:

We are writing on behalf of Rutland Regional Medical Center (“RRMC”) in connection with the above matter to disclose a change in the cost of the project. We do not believe the additional cost changes the outcome of the Green Mountain Care Board’s previous jurisdictional determination, but acknowledge the obligation to make this disclosure to update the previous scope of the project.

On September 10, 2021, we requested a jurisdictional determination by the Green Mountain Care Board (the “Board”) with respect to RRMC’s need to secure a temporary mobile MRI unit (the “Mobile Unit”). In a letter dated September 17, 2022, the Board confirmed that the project was not subject to certificate of need review under 18 V.S.A. § 9434(b)(2) (3). At that time, the Board directed RRMC to contact the Board if any changes in type, scope, duration or cost of the project were to arise.

RRMC is writing to disclose a change in the cost of the project due to an unanticipated cost associated with a necessary component that was determined to be more extensive than originally identified.

RRMC did not include the costs associated with an outdoor walkway for the Mobile Unit in the 10 September 2021 jurisdictional determination letter. At that time, RRMC anticipated using an existing canopy that it owned and used from time-to-time for various projects. The plan was to use the canopy for the temporary, outdoor walkway that would be required to protect patients from the elements when transported from inside RRMC’s Radiology Department to the temporary Mobile Unit located outside the building .

Once the Mobile Unit was delivered, RRMC made the determination that the scope of the protected walkway was more significant than originally identified. RRMC went from using an existing canopy, at no cost, to having to incorporate the same into a larger walkway, with significant infrastructural needs.

First, the distance from the Radiology Department point of egress to the Mobile Unit’s entrance is greater than originally anticipated because the trailer housing the Mobile Unit is larger than originally expected.

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Second, because of the need to construct a walkway for use over the extended period of time during which the Mobile Unit is in use, the Vermont Department of Public Safety, Division of Fire Safety, demanded increased safety requirements for the temporary walkway, including the installation of a sprinkler system, a horn strobe, lighting, lighted exit signs, fire extinguishers, an exit door, and making a 5-inch fire hose available on site for the fire department. Third, when RRMC tried to install the original sides for its existing canopy, the hospital discovered that the sides had deteriorated to the point that they could not be attached to the frame and were no longer useable. RRMC had to purchase a more durable material to replace the sidewalls. Finally, RRMC also identified the need to heat the space, given the distance a patient would need to be transported by stretcher to the temporary trailer.

The walkway is enclosed on all sides, with windows and a door for egress, as required for fire safety requirements. A concrete walkway already existed, and a thin strip of concrete was added to expand the path to allow for better anchoring of the structure. The adjacent pavement was deteriorated and determined to not be adequately safe or reliable for proper anchoring. The photo of the interior submitted with this letter includes a light-blue arrow pointing to the strip of new concrete added to the existing concrete. A photo depicting the walkway exterior is also included with this letter. The top is an all-season canopy, and the sides are USG Ultralight Glass-Mat Sheathing.

The final cost of the walkway is \$39,961.00, with the final costs detailed in this letter. Additionally, there are regular operational costs associated with heating the space via propane heaters, with costs fluctuating based on ambient air temperatures. At this time, the only potential future expense that has been identified is the potential for cooling the walkway in the summer months. RRMC expects that any such expenses would cost no more than \$5,000.00.

Based on the financial information previously submitted, and even with the additional expenses identified in this letter, including the potential need to cool the walkway this coming summer, this project does not trigger the Board's jurisdiction under 18 V.S.A. § 9434(b)(2) ("The purchase, lease, or other comparable arrangement of a single piece of diagnostic and therapeutic equipment for which the cost, or in the case of a donation the value, is in excess of \$1,500,000.00. . .").

Based on the foregoing, RRMC respectfully seeks the Board's determination that these additional costs to secure and operate the Mobile Unit do not trigger the Board's jurisdiction.

Thank you and the Board for your time and consideration.

Respectfully submitted,

*/s/ Shireen T. Hart*

Shireen T. Hart

Enclosures





37.33 KB/s Tuesday, February 8, 2022 2:49:58 PM