

March 28, 2022

ELECTRONIC DELIVERY

Donna Jerry
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Green Mountain Care Board
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RE: Northeastern Vermont Regional Hospital Emergency Room extension

Dear Ms. Jerry:

Please consider this letter as Northeastern Vermont Regional Hospital's ("NVRH") request for a determination by the Green Mountain Care Board ("GMCB") that the hospital may proceed with a portion of our proposed Emergency Room/West Wing expansion project (the "Project") prior to receiving a Certificate of Need for the entire project. The Emergency Room/West Wing expansion project includes a 2,996 square foot addition for a mental health support area, five (5) new emergency department exam rooms, and renovations to the existing emergency and laboratory space. Hereinafter, we will refer to the mental health support area as Phase 1 of the Project. Phase 1 is intended to be part of the larger Project. However, Phase 1 has been designed to be a standalone structure connected to the Emergency Department. If the remainder of the Project is never completed, the mental health support area will stand alone as an addition to the existing Emergency Department. A Certificate of Need ("CON") application for the Project will be submitted in the next few months. We are requesting approval to proceed with Phase 1 before NVRH's CON application for the Project is submitted to the GMCB.

Background

NVRH is a Critical Access Hospital (CAH) located in Saint Johnsbury, Vermont. We provide high-quality, cost-effective healthcare services to the people who call Vermont's Northeast Kingdom (NEK) home. Our rural health system includes a 25-bed critical access hospital, multiple primary care clinics, specialty and surgical services, birth center, and a 24-hour, physician staffed emergency department. Currently, serving a population of 30,000 in the Caledonia and Southern Essex counties.

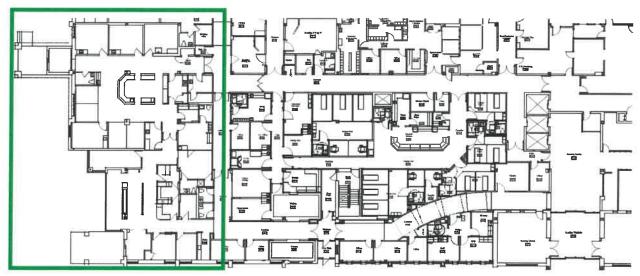
NVRH, built in 1972, has seen tremendous changes in the healthcare needs of our community as we celebrate our 50th anniversary this year. Over the years, we have had some large-scale

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updates to our physical foot established in 1972. The Administration building added in 2005, houses non-clinical, Human Resources, and Executive teams. In 2007, there was a second large-scale expansion expanding our Diagnostic Imaging and immediately adjacent surgical suite and Day Surgery areas. There was a minimal amount of square footage added to the Laboratory. Expansion to house an in-house MRI completed in December 2019. Many of the original Physical Plant systems have been marginally updated since their original installation.

Location

Below you will see an overarching diagram of the front portion of the main floor. The ED is referenced in green on the west end of the main floor as seen below.



Phase 1, Expansion to current Emergency Department

The Emergency Department is an integral initial access point for community members to NVRH. In 2019 renovation and expansion discussions began. Before this the ED had an internally conducted update in 1994; this did not increase their internal or external square footage, just adjustments to their current footprint. The only update to the original building since 1972. With the COVID-19 pandemic delaying progress, NVRH has been provided some first-hand experience in the urgency in which we need to provide better service to the people in our community. With this, we have created a multi-phase expansion and renovation plan for the Emergency Department. The first phase, and most urgent need, is to address the critical need for more rooms for people who may be experiencing a mental health crisis. In working with our community partners and peers, we have designed a set of care spaces providing support and beginning healing.

The NEK lacks sufficient facilities and resources to address the increased number of community members in need of emergency mental health care. Often the NVRH Emergency Department (ED) is on the front lines of caring for these people, both adolescents and adults. Unfortunately, the ED was not constructed to provide adequate space to care for people experiencing a mental

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health crisis, nor was the space constructed to ensure the safety of the providers and families members attempted to help. Many patients end up in a "waiting pattern" in one of the 9 ED beds, awaiting placement in an appropriate treatment facility, and occupying a bed for hours (or days) making it unavailable for incoming Emergency Department cases.

The Reality at NVRH:

- NVRH has cared for 69 people year-to-date in 2022 with 444 people served in 2021. Of these served in 2021, 376 adults and 68 minors. One minor patient remained with NVRH for a few hours shy of 14 days.
- The average number of "mental health boarding" hours in the NVRH ED has increased, from 23.8 hours in 2021 to 27.7 hours in 2022 (average year to-date). This is due to an inability to locate an appropriate treatment facility with an available bed that can take the patient. NVRH must provide a bed (in an 85 square foot room with little privacy) until a placement can be found.
- The pandemic has been particularly devastating to our community's youth. In 2019, the ED cared for 18 youth in mental health crisis; that has tripled to 69 youth in 2021 and 18 year-to-date in 2022.
- In 2021, had 5 occasions where we have had 5 or more patients in crisis within our care at NVRH for a 24 hour period, with a maximum of 8 patients in a 24 hour period happening twice. In all of these occurrences, there was a mixed population of adult and adolescent patients as well as a mixture of "voluntary" and "involuntary" patients.

The practice of medicine has evolved significantly over the last 50 years. ED providers now perform more procedures and treatments than in the past, meaning patients are often able to avoid hospitalization, and sometimes even surgery. While NVRH's team and treatment have advanced—utilizing healthcare's best practices and processes—the ED facilities are among the most outdated in the hospital.

Growing patient numbers, particularly in the Emergency Department, have strained the hospital facilities. The Northeast Kingdom has the oldest population in the state and people are living longer due to advanced medical care. This results in a growing need for emergency care for critical illnesses and episodes such as heart attacks and strokes. In addition to local community members, tourists enjoy skiing, snowmobiling, mountain biking, and the beauty of our lakes and other recreational areas. When they are hurt or sick, they come to NVRH.

In the last year, approximately 12,000 individuals visited the ED. On average, the department saw 33 patients daily, with as many as 50+ on its busiest days. This causes a ripple effect in other areas of the hospital: there are more people to register, labs to conduct, and diagnostic images to take.

NVRH offers quality healthcare. The hospital continuously strives to advance and evolve alongside its community's needs. Cramped spaces, outdated equipment, concerns with privacy and comfort, and inadequate accommodations for staff stall this progress.

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We have been working with our community partners and people with lived experience to ensure the extension is meeting the needs of all parties. Taken into consideration are a multitude of cohort scenarios, access, and visitation to the space as well as a plan to continue exploration with community partners and individuals who have experienced our current spaces in the future. We have had engaged with members of Vermont Department of Mental Health, Vermont Legal Aide, Disability Rights Vermont, Northeast Kingdom Human Services, Northern Counties Healthcare, Pediatricians, and people within the peer support and lived experience communities.

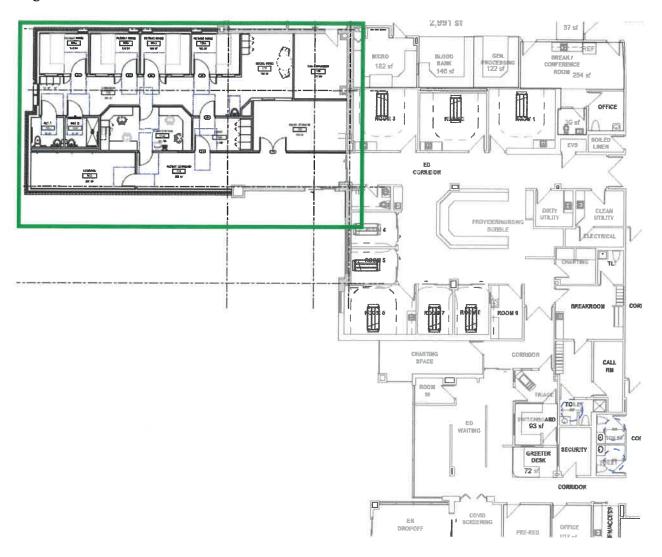
Phase 2, the later of our facility plan include an additional increase in footprint to the ED that integrates with the above area, renovation of the existing ED treatment and support areas. It also includes partial renovations to the Laboratory. This larger-scale project, while still in progress now, will be presented to the GMCB CON formally later this year.

Location

Phase 1 plan will extend our current Emergency Department care spaces into our current parking lot. There will be minimal site work required with minimal impact on current traffic patterns with this extension.

Size

The current ED total gross square footage is 6,000. The requested additional space is 2,996 square feet. Within this space will be four care spaces, a social room, staff station, patient toilet, patient shower, additional storage for the ED, and additional space made available to the adjacent Laboratory as seen below.



Cost

An estimation of \$800 per square foot and a total area of 2,996 SF construction costs totaling \$2,206,936. The inclusion of owner costs, estimated to be 30% of construction costs, brings the total to \$2,803,524, which is below the current Certificate of Need limit.

PROJECT FINANCING PLAN:

The estimated cost to complete Phase 1 of the Emergency Department Mental Health expansion project is \$2,803,524. Through the efforts of Senator Leahy, NVRH will receive up to \$3 million of federal funds to pay for Phase 1, the mental health support area of the Project.

In summary, Northeastern Vermont Regional hospital will submit a Certificate of Need application for our Emergency Room/West Wing expansion project. The hospital is seeking Green Mountain Care Board approval to begin construction of the new mental health support area, Phase 1 of the Project, prior to receiving a Certificate of Need for the entire project.

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Completion of Phase 1 will help NVRH better meet the needs of patients in mental health crisis who present in our Emergency Department.

| Project Location | Impacted Total SF | Area Total Cost | Timing |
|------------------|-------------------|-----------------|---------------------------------|
| ED MH care rooms | 2,996 | \$2,803,524 | Urgent 1 st priority |

Thank you and the Green Mountain Care Board staff for your time and consideration. We look forward to the Board's jurisdictional determination.

Kind regards,

Shawn P. Tester

Chief Executive Officer

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