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**DELIVERED ELECTRONICALLY**

April 12, 2022

Shawn P. Tester, Chief Executive Officer  
Northeastern Vermont Regional Hospital  
P.O. Box 905  
1315 Hospital Drive  
St. Johnsbury, VT 05819

RE: NVRH Emergency Room Extension

Dear Mr. Tester:

Thank you for your March 28, 2022 letter requesting a determination from the Board as to whether NVRH may proceed with the Mental Health Expansion portion (Phase 1) of its proposed Emergency Room/West Wing Expansion Project (Project) prior to applying for, and receiving, a Certificate of Need (CON) for the entire project. Your letter reflects that the estimated cost to complete only Phase 1 would be \$2,803,524, which falls below the recently revised monetary jurisdictional threshold.

It is not clear from the letter whether NVRH is conceding that Phase 1 is subject to CON review or requesting a determination that Phase 1 is not subject to CON review because it can be separated from the Project and is below the jurisdictional threshold. Please clarify NVRH's position. Please also address the considerations listed in GMCB Rule 4.000, § 4.207(2). Specifically, please

1. Describe the structural interrelationship of Phase 1 with the remainder of the larger Project.
2. Describe the financial interrelationship of Phase 1 with the remainder of the larger Project.
3. Address whether Phase 1 and the remainder of the larger Project are directed at a single overall objective; and
4. Describe the time frame in which Phase I and the components of the larger Project are to be accomplished.

In addition, please provide the following information:

5. Regarding the 2,996 square foot addition for a mental health support area:
  - a. Describe NVRH's efforts to reach out to members of the mental health advocacy community, including a list of the groups and individuals NVRH has consulted, the period and extent of engagement with each, and their input into the design of the rooms and other spaces within the mental health support area.



- b. Specify which individuals or groups have expressed support for Phase 1 and the current layout and design of the individual rooms and other related spaces within the mental health unit.
6. Regarding the federal funds anticipated to pay for Phase 1:
  - a. Are there any specific timing constraints to receive and use those funds?
  - b. It is stated that NVRH expects to receive “up to” \$3 million of federal funds to pay for Phase 1. Please explain the specific amount NVRH expects to receive and how the final amount will be determined.

In responding, please restate the question in bold font and respond in unbolded font. Send an electronic copy to me at [donna.jerry@vermont.gov](mailto: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

