April 11, 2022

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

RE: Docket No. GMCB-014-21con, North Country Hospital, Construction and Renovation Project Involving the In-Patient Department, Emergency Department, Lab Department, OT/PT/ST Department and Access and Canopies. Total Project Cost: $27,898,176.

Dear Ms. Jerry,

As requested, please find responses to further inquiries from your April 1, 2022, letter regarding North Country Hospital's proposed project.

1. **On page 6 of the application, it states that North Country Hospital is pursuing grant and alternative funding opportunities of approximately $7,650,000. Identify where these grant funds are recorded in financial Tables 1-5. If not included, revise and resubmit.**

   The alternate funding opportunities stated in the narrative are not included in the financial information. These funds are not guaranteed to be awarded to North Country Hospital. The grant money, if given, will decrease the amount needed to be borrowed and therefore decrease the interest expense. The financial reflects a conservative picture and would only improve with less interest expense.

2. **In Table 1, debt financing expenses are listed as $3,216,506 and in Table 2, working capital is listed as $3,216,506. Explain why these values are the same and identify where these values are reflected in the Income Statement (Table 3 A, B, C) and the Balance Sheet (Table 4 A, B, C). If not reflected, revise and resubmit.**

   By using the same amount of $3,216,506 for debt financing expenses on Table 1 and working capital on Table 2, the intent was to portray that the all the debt financing expenses would be funded out of cash or through investment income. This would not increase the need for additional funds or rate increases. We have edited Table 3A and 3B to clearly show the investment income that would offset the interest in Table 3B. The combined remains the same. This is shown on the balance sheet. The rate of increase in the investments is smaller than what would be projected. This is because of investment income being drawn to pay the interest instead of being reinvested.

3. **In Table 4 (Balance Sheet), Land, Buildings & Improvements and Major Moveable Equipment are listed, but in Table 2 there are no line items equal to these amounts and Major Moveable Equipment has no amount listed. Correct and resubmit Table 2 and Table 4 A, B, and C if revisions are needed.**

We have corrected the balance sheet to reflect 100% of the project in Land, Building, and equipment to match Table 2.

4. **On Table 3 A,B,C, the interest expense for 2023 for the project is equal to the amount of depreciation for 2024. Explain why these are the same and if incorrect, revise and resubmit.**

The fact that the interest expense for 2023 and the depreciation expense for 2024 are the same number is a coincidence. No changes needed.

5. **Explain whether this project will increase payer rates (change in charge).**

This project is not forecasted to increase payer rates, the rate increases built into the model are only to cover normal operational expense increases.

6. **In Table 7 A, B, C, there are no changes in utilization due to the project. Confirm if this is true and if not, correct and resubmit.**

There are no utilization increases due to this project. No changes needed.

7. **In Table 3, a 1.8%, 1.8%, and 1.7% operating margin is listed for 2023-2025 without the project. With the project, the operating margin is listed as 0.8%, -0.2%, and -0.2%. Per the FY22 Hospital Budget Order, North Country Hospital is expecting to incur costs for a new Electronic Medical Records (EMR) system. Explain how the hospital will absorb the additional expenses for this proposed project and the EMR system without additional utilization and revenue.**

Last budget we did seek a rate increase to cover the cost of the EMR system. Although we believed this approach to be the best path, it was declined by the Green Mountain Care Board and we were advised to use cash to cover these expenses. This project is following the same course. The two expenses associated with this project are interest expense and depreciation. The interest expense will be paid by earnings on our investments as discussed above and the depreciation expense will not be funded and therefore will decrease the operating margin.

8. **Table 8 A, B, C (Staffing), shows no change in staffing due to the project. Confirm whether this is the case. If not, revise and resubmit.**

There are no projected changes in staffing with this project. The updated facility improves the workflow environment for staff which includes LEAN engineering. With growing labor shortages, the project seeks to provide updated safe and appropriate care environments while increasing labor efficiencies.

Sincerely,

Brian Nall

Brian Nall, NCH President & CEO
Cc: Steve Horton

Verification Under Oath

STATE OF VERMONT
GREEN MOUNTAIN CARE BOARD

In re:	)	
	)	Docket No. **GMCB-014-21**
	)	
	)	

Verification Under Oath to file with Certificate of Need Application, correspondence and additional information subsequent to filing an Application.

[Officer or other deponent], being duly sworn, states on oath as follows:

1. My name is Brian Nall. I am the President and CEO of North Country Hospital. I have reviewed the Responses to Inquiries from Donna Jerry on April 1, 2022.

2. Based on my personal knowledge and after diligent inquiry, I attest that the information contained in Responses to Inquiries from Donna Jerry on April 1, 2022, is true, accurate and complete, does not contain any untrue statement of a material fact, and does not omit to state a material fact.

3. My personal knowledge of the truth, accuracy and completeness of the information contained in the Responses to Inquiries from Donna Jerry on April 1, 2022, is based upon either my actual knowledge of the subject information or upon information reasonably believed by me to be true and reliable and provided to me by the individuals identified below in paragraph 4. Each of these individuals has also certified that the information they have provided is true, accurate and complete, does not contain any untrue statement of a material fact and does not omit to state a material fact.

4. The following individuals have provided information or documents to me in connection with Responses to Inquiries from Donna jerry dated April 1, 2002, and each individual has certified, based either upon his or her actual knowledge of the subject information or, where specifically identified in such certification, based on information reasonably believed by the individual to be reliable, that the information or documents provided are true, accurate and complete, do not contain any untrue statement of a material fact, and do not omit to state a material fact:

    Tracey L. Paul- North Country Hospital
    Steve Horton- Owner's Representative

5. In the event that the information contained in the Responses to Inquiries from Donna Jerry on April 1, 2022 becomes untrue, inaccurate or incomplete in any material respect, I acknowledge my obligation to notify the Green Mountain Care Board and to supplement the Response to Inquiries from Donna Jerry on April 1, 2022 as soon as I know, or

reasonably should know, that the information or document has become untrue, inaccurate or incomplete in any material respect.

Brian Nall

[signature]

On (date) 4/12/22, Brian Nall appeared before me and swore to the truth, accuracy and completeness of the foregoing.

Notary public

My commission expires 01 / 31 / 2023

[seal] Cred# 157.0012126