

Donna Jerry, Senior Health Policy Analyst Green Mountain Care Board 144 State Street Monteplier, VT 05620 October 17th, 2022

Re: Letter of Jursidictional Determination

Dear Donna,

Belonging Medical Group PLLC, is requesting a Jurisdictional Determination from the Green Mountain Care Board concerning the requirement of a Certificate of Need (CON). This letter will identify our requested expansion of proposed services as well as future possible projects.

Belonging Medical Group

Belonging Medical Group's mission is to help any underserved individual achieve a healthier life filled with belonging, love, and purpose. We partner with local organizations to provide harm reduction and integrated high-quality medical, behavioral health, and social care for adults across New England servicing Vermont, New Hampshire, Massachusetts, and Maine. We provide substance use disorder (SUD) treatment to include both Opiate Use Disorder (OUD) and Alcohol Use Disorder (AUD) treatment, in a hybrid model combining both in-person and telehealth services. Our program includes medication-assisted treatment with medications such as Buprenorphine/Naloxone (Suboxone) with supportive group therapy by licensed professionals. We also offer, to our members, Virtual Responsive Care (VRC), which provides medical care and mental health services to all members in our substance use disorder treatment programs. We assess needs, provide basic medical care and referrals where appropriate, in coordination with the member's existing care teams elsewhere.

Our harm reduction treatment is tailored to each individual member and we offer comprehensive care that's easy to access, regardless of residency in any of the states that we serve. We make our physical and mental health services effective and affordable by partnering with local community organizations at their locations, where



members are already at, to provide our group services. In addition to our SUD care we also provide mental health services. We work with our members to identify and treat symptoms of mental illness because we acknowledge that locating effective mental health care without judgment can often be a significant challenge to wellness. Mental health (MH) services are provided by psychiatrists, psychiatric nurses, and counselors. All members are also supported by our larger Central Team who provide care coordination services.

Vermont Services

We are currently serving approximately 500 Vermonters across the state without barriers or impediments. We offer opioid use disorder (OUD) and alcohol use disorder (AUD) medication-assisted treatment (MAT) within a group based model of care by licensed professionals (LADC, LICSW, LCMHC) living within the state. Members engage in weekly group counseling sessions, as required for prescription services, as well as on-demand 1:1 counseling sessions. Once monthly members engage in group sessions with their Medical Provider, with additional on-demand individual provider encounters offered upon request. Although the roots of our model are based in weekly group counseling sessions, we also offer a phased approach to treatment that includes weekly, bi-weekly, and monthly group engagements. We also offer Virtual Responsive Care to our VT members via on-demand or schedule 1:1 encounters with a medical provider. Currently all services, outside of the Vermont FLEX program (described below), are offered via telehealth. For our telehealth services we utilize either phone or Zoom platform.

Flex Program

The Vermont FLEX program is a collaborative grant program between DSU, Vermont Cares, The AIDS Project of Southern Vermont, and Better Life Partners. Flex offers low barrier Opioid Use Disorder (OUD) treatment for the hardest to reach communities who use drugs (PWUD), grounded in the principles of harm reduction. We have increased access and engagement to treatment for individuals currently utilizing syringe service program (SSP) services from Vermont CARES and AIDS Project of Southern Vermont. This program is designed for individuals who require more flexible care models or for those whose goals are less clearly oriented toward not using substances. In this program, members drop into an onsite Syringe Service Program (SSP) location of their convenience or engage with a FLEX team member virtually or in the community.



Members will receive 7-day prescriptions based on weekly engagement with a medical provider and/or RN and/or Counselor with the support of Recovery Coach services. We meet members either onsite at the SSP locations or via telehealth services to best support individuals moving from opioid harm reduction services to treatment for opioid use disorder. This project is solely funded by a grant provided by DSU.

Proposed Project Services

Belonging Medical Group requests expanding our services to become an identified Spoke within the Vermont Blueprint for Health Hub & Spoke system. Our Spoke services will be phased into several Health Service Areas across the state. Our initial Spoke will be located in the Central Vermont Health Service Area where our Montpelier, Vermont Headquarters are located. We will maintain fidelity to our hybrid model which allows for both in-person and telehealth services, and will continue to function as providers with no intention to distribute MAT medications onsite. We plan to open our Montpelier office for in-person member services in conjunction with the telehealth services already being offered. The table below outlines services that will be available to our members.

Services Provided	Location	Level of Provider	
		Spoke RN & Spoke	
Health Home Services	on-site/telehealth	Counselor	
1:1 Counseling	on-site/telehealth	LADC/LICSW/LCMHC	
Group Counseling	on-site/telehealth	LADC/LICSW/LCMHC	
Medication Assisted Therapy	on-site/telehealth	MD/NP	
1 FTE RN & Counselor per 100 Members	on-site/telehealth	LADC/LICSW/LCMHC	
1 FTE Medical Director & Per Diem NP	on-site/telehealth	MD/NP	

Possible Project

As well as the proposed project, we also wish to seek Jurisdictional opinion of any possible projects ahead of any Request for Proposals (RFP) for services issued by the



Alcohol and Drug Use Program. We seek to fully be integrated into Vermont's system of SUD care by obtaining Preferred Provider status as a Certified Alcohol and Drug Use Program. At the time of the proposed RFP, we wish to move forward quickly, and would be subject to review. Preferred Provider status will allow us to fully integrate into Vermont's System of care as a reputable provider. It will also allow us to be financially sustainable while offering Vermonters a high quality standard of care. Preferred Provider status will also allow us to clinically supervise professional growth for LADC licensure. Currently, without this status, we are unable to hire and train those working towards licensure per the Office of Professional Regulation. We would love to support Vermont's diminishing SUD & MH workforce by providing training, guidance, and supervision to nurture those who desire professional growth.

We have also attached the required *Financial Data Form* to this letter.

On behalf of Belonging Medical Group's Leadership Team, we thank you in advance for your consideration.

Dawn Taylor, MA, LADC, CS

Pronouns: she/her

Vermont Clinical & Operations Director

Better Life Partners

Phone: (866) 679-0831 ext. 145

Email: dawn.taylor@betterlifepartners.com

Project & Operating Costs							
Name of Project:			Spo				
lame of Organization			Belonging Me	dical Group			
		Actual		Projections			
Project Costs (For a 12-Month Period):		LTM (07/31/22)	Year 1	Year 2	Year 3		BLP Notes / Commentary
Construction Costs						Applicable?	Commentary
New Construction Renovation		\$-	\$- -	\$- -	\$ -	No No	No construction has / is planned to occur in VT, which highlights a hallmark of the BLP model - an asset light and flexibi
ite Work		-		<u> </u>		No	business that attempts to deliver care where Our Members need
ixed Equipment		-	-	-	-	No	NA
Design/Bidding Contingency		-	-	-	-	No	NA
Construction Contingency		-	-	-	-	No	NA
Construction Manager Fee Other (please specify):		-		-		No No	NA NA
Other []:						No	NA NA
Other []:		-	-	-	-	No	NA
Subtotal		\$-	\$-	\$-	\$ -		
Related Project Costs							
Major Moveable Equipment		\$ -	\$-	\$ -	\$ -	No	NA
Furnishings, Fixtures & Other Equip.		-	1,000	3,000	3,000	Yes	\$1,000 per office in Yr. 1 increasing to \$3,000 by Yr. 3
Architectural/Engineering Fees		-	-	-	-	No	NA
and Acquisition		-	-	-	-	No	NA
Purchase of Buildings		-	-	-	-	No	NA NA
Administrative Expenses & Permits		- \$-	- \$-	- \$-	ş-	No	NA I think this formula was busted in the template version FYI
Total Debt Financing Expenses (see below) Debt Service Reserve Fund		> -	3 -	\$ -	3 -	No	See note below regarding debt
Norking Capital		-	-	_	-	No	NA
Other (please specify)		-	-	-	-	No	NA
Other []:		-	-	-	-	No	NA
Other []: Subtotal		ş-	\$1,000	\$3,000	\$3,000	No	NA
otal Project Costs		Ş- \$-	\$1,000	\$3,000	\$3,000		
		V -	Ψ1,000	ΨΟ,ΟΟΟ	ψ0,000		
Debt Financing Expenses							
Capital Interest		\$ -	\$-	\$-	\$-	No	<< None specifically attributable to VT BMG
Bond Discount or Placement Fee		-	-	-		No No	<< None specifically attributable to VT BMG
Misc. Financing Fees & Exp. (issuance costs) Other (specify):						No	<< None specifically attributable to VT BMG << None specifically attributable to VT BMG
Other []:		_	_		_	No	NA
Other []:		-	-	-	-	No	NA
Subtotal		\$-	\$-	\$-	\$-		
ess Interest Earnings on Funds:							,
Debt Service Reserve Funds		\$ -	\$-	\$-	\$-	No	<< None specifically attributable to VT BMG
Capitalized Interest Account Construction Fund		-	-	-		No No	<< None specifically attributable to VT BMG << None specifically attributable to VT BMG
Other (specify):		-	_	-	_	No	<< None specifically attributable to VT BMG
Other []:		-	-	-	-	No	<< None specifically attributable to VT BMG
Subtotal		\$-	\$-	\$-	\$-		
Total Debt Financing Expenses		\$-	\$-	\$-	\$ -		
Operating Costs (expenses):		Actual LTM (07/31/22)	Variat	Projections	Year 3		BLP Notes / Commentary
Staffing Expenses		LTW (07/31/22)	Year 1	Year 2	Teal 5	Applicable?	Commentary
Salaries per FTE		\$626,738	\$861,484	\$1,122,638	\$1,308,465	Yes	<< Reflects TOTAL Cummulative Wages
ringe Benefits/Health Insurance	7.0%	44,106	60,625	79,004	92,081	Yes	<< TOTAL NOT PER FTE; % of wages held flat
Professional Insurance		8,670	8,670	8,670			Total Insurance
Staff Travel					8,670	Yes	
		3,293	3,293	3,293	3,293	Yes	Total Travel
						Yes Yes	Total Travel Contractors Expenses
Subscriptions/Dues	6.8%	3,293 89,432	3,293 89,432	3,293 89,432	3,293 89,432	Yes Yes No	Total Travel Contractors Expenses NA
Subscriptions/Dues Other - Payroll Taxes	6.8%	3,293	3,293	3,293	3,293	Yes Yes	Total Travel Contractors Expenses
Subscriptions/Dues Other - Payroll Taxes Other - Member Supplies	6.8%	3,293 89,432 - 42,578	3,293 89,432 - 58,525	3,293 89,432 76,267	3,293 89,432 - 88,891	Yes Yes No Yes	Total Travel Contractors Expenses NA Sum of Federal & State & Local Taxes
Subscriptions/Dues Other - Payroll Taxes Other - Member Supplies Other - Miscellaneous Equip	6.8%	3,293 89,432 - 42,578 468	3,293 89,432 - 58,525 468	3,293 89,432 76,267 468	3,293 89,432 88,891 468	Yes Yes No Yes Yes	Total Travel Contractors Expenses NA Sum of Federal & State & Local Taxes Total Member Supplies
Subscriptions/Dues Uther - Payroll Taxes Uther - Member Supplies Other - Miscellaneous Equip Operation Expenses Supplies/printing	6.8%	3,293 89,432 - 42,578 468	3,293 89,432 - 58,525 468	3,293 89,432 76,267 468	3,293 89,432 88,891 468	Yes Yes No Yes Yes Yes Yes Yes	Total Travel Contractors Expenses NA Sum of Federal & State & Local Taxes Total Member Supplies
Subscriptions/Dues Ther - Payroll Taxes Other - Member Supplies Other - Miscellaneous Equip Operation Expenses Supplies/printing Depreciation	6.8%	3,293 89,432 - 42,578 468 74	3,293 89,432 - 58,525 468 74	3,293 89,432 - 76,267 468 74	3,293 89,432 - 88,891 468 74	Yes Yes No Yes Yes Yes Yes Yes No	Total Travel Contractors Expenses NA Sum of Federal & State & Local Taxes Total Member Supplies Total Equp. Within Under Bus. Expenses Office Supplies NA
Subscriptions/Dues Other - Payroll Taxes Other - Miscellaneous Equip Operation Expenses Supplies/printing Operaciation	6.8%	3,293 89,432 - 42,578 468 74 \$590	3,293 89,432 	3,293 89,432 	3,293 89,432 	Yes Yes No Yes Yes Yes Yes Yes No No	Total Travel Contractors Expenses NA Sum of Federal & State & Local Taxes Total Member Supplies Total Equp. Within Under Bus. Expenses Office Supplies NA NA
Subscriptions/Dues Uther - Payroll Taxes Uther - Member Supplies Uther - Miscellaneous Equip Uther - Miscellaneous	6.8%	3,293 89,432 - 42,578 468 74	3,293 89,432 - 58,525 468 74 \$590	3,293 89,432 - 76,267 468 74 \$590	3,293 89,432 - 88,891 468 74	Yes Yes No Yes Yes Yes Yes Yes No No Yes	Total Travel Contractors Expenses NA Sum of Federal & State & Local Taxes Total Member Supplies Total Equp, Within Under Bus. Expenses Office Supplies NA NA Projections LTM as of subsequent year based on model
Subscriptions/Dues Uther - Payroll Taxes Uther - Member Supplies Uther - Miscellaneous Equip Uther - Miscellaneous	6.8%	\$3,293 89,432 42,578 468 74 \$590 - - 43,477	3,293 89,432 58,525 468 74 \$590 	3,293 89,432 76,267 468 74 \$590	3,293 89,432 88,891 468 74 \$590	Yes Yes No Yes Yes Yes Yes No	Total Travel Contractors Expenses NA Sum of Federal & State & Local Taxes Total Member Supplies Total Equp. Within Under Bus. Expenses Office Supplies NA NA Projections LTM as of subsequent year based on model Included in staff travel
Subscriptions/Dues Other - Payroll Taxes Other - Member Supplies Other - Miscellaneous Equip Operation Expenses Supplies/printing Depreciation Interest divertising/Marketing/Printing Vehicle Expense/Auto Insurance Rent/Lease Expense	6.8%	3,293 89,432 - 42,578 468 74 \$590	3,293 89,432 	3,293 89,432 	3,293 89,432 	Yes Yes No Yes Yes Yes Yes Yes No No Yes	Total Travel Contractors Expenses NA Sum of Federal & State & Local Taxes Total Member Supplies Total Equp. Within Under Bus. Expenses Office Supplies NA NA Projections LTM as of subsequent year based on model Included in staff travel Rent & Lease None in LTM period ending 07/31/22
Subscriptions/Dues Dither - Payroll Taxes Dither - Member Supplies Dither - Miscellaneous Equip Dperation Expenses Supplies/printing Depreciation niterest Advertising/Marketing/Printing Advertising/Marketing/Printing Advertising-Marketing/Printing Advertising-Marketing/Printing Advertising-Marketing-Printing Advertising-Marketing-Print	6.8%	\$3,293 89,432 42,578 468 74 \$590 - - 43,477	3,293 89,432 58,525 468 74 \$590 	3,293 89,432 76,267 468 74 \$590	3,293 89,432 88,891 468 74 \$590	Yes Yes No Yes Yes Yes Yes No No Yes Yes Yes No No Yes No Yes Yes Yes Yes Yes Yes	Total Travel Contractors Expenses NA Sum of Federal & State & Local Taxes Total Member Supplies Total Equp. Within Under Bus. Expenses Office Supplies NA NA Projections LTM as of subsequent year based on model Included in staff travel Rent & Lease None in LTM period ending 07/31/22 Software Expenses
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Subscriptions/Dues Other - Payroll Taxes Other - Member Supplies Other - Miscellaneous Equip Operation Expenses Supplies/printing Depreciation Interest Advertising/Marketing/Printing Vehicle Expense/Auto Insurance Rent/Lease Expense Utilities/Telephone Expenses Computer/hardware/Software Building Maintenance and repair Property Taxes	6.8%	3,293 89,432 42,578 468 74 \$590 - - 43,477 - 4,410 - 35,235 - 3,266	\$,293 89,432 58,525 468 74 \$590 - 51,000 - 4,410 - 35,235 - 3,266	3,293 89,432 76,267 468 74 \$590 - - 36,000 - 4,410 - 35,235 - 3,266	3,293 89,432 88,891 468 74 \$590 - 36,000 4,410 35,235 3,266	Yes Yes No Yes Yes Yes Yes No No No No Yes No No Yes No Yes No Yes No Yes Yes	Total Travel Contractors Expenses NA Sum of Federal & State & Local Taxes Total Member Supplies Total Equp. Within Under Bus. Expenses Office Supplies NA NA Projections LTM as of subsequent year based on model Included in staff travel Rent & Lease None in LTM period ending 07/31/22 Software Expenses NA Taxes & Licenses
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Consultant costs & travel Subscriptions/Dues Other - Payroll Taxes Other - Member Supplies Other - Miscellaneous Equip Operation Expenses Supplies/printing Depreciation Interest Advertising/Marketing/Printing Vehicle Expense/Auto Insurance Rent/Lease Expense Utilities/Telephone Expenses Computer/hardware/Software Suilding Maintenance and repair Property Taxes Legal Services Silling Services Security Services Other - Shipping expense	6.8%	3,293 89,432 42,578 468 74 \$590 	3,293 89,432 58,525 468 74 \$590 	3,293 89,432 76,267 468 74 \$590 	3,293 89,432 88,891 468 74 \$590 - 36,000 - 4,410 35,235 - 3,266 6,390 - - -	Yes Yes No Yes Yes Yes Yes No No Yes No No Yes Yes No No Yes	Total Travel Contractors Expenses NA Sum of Federal & State & Local Taxes Total Member Supplies Total Equp. Within Under Bus. Expenses Office Supplies NA NA Projections LTM as of subsequent year based on model Included in staff travel Rent & Lease None in LTM period ending 07/31/22 Software Expenses NA Taxes & Licenses Legal Fees NA NA Taxes & Licenses Legal Fees NA NA Total shipping Event/Conference Fees
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Equipment Costs
Name of Project:
Name of Organization: Spoke Better Life Partners

	Latest Actuals	Year 1	Year 2	Applicable?
Equipment costs	\$-	\$-	\$-	Yes
Studies/Surveys Expense	-	-	-	No
Designs/Plans/Working Drawings	_	-	-	No
Installation Costs	-	-	-	No
Renovation/construction costs	-	-	-	No
Financing costs	_	-	_	No
Maintenance/service contracts	_	-	_	No
Other component costs	_	-	-	No
Lease costs	-	-	-	No
Equipment operating costs	590	590	590	Yes
Other (specify):	-	-	-	No
	-	-	-	No
	-	-	-	No
	-	-	_	No
Less fair market trade-in	-	-	-	No
Total equipment Costs	\$ 589.57	\$ 589.57	\$ 589.57	

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