

DELIVERED ELECTRONICALLY

October 21, 2022

Dawn Taylor
Better Life Partners
44 S Main St Ste 2
Hanover, NH 03755**RE: Docket No. GMCB-013-22con, Belonging Medical Group PLLC, Expansion of Substance Use Disorder (SUD) Services to Become an Identified Spoke within the Vermont Blueprint for Health Hub & Spoke System**

Dear Ms. Taylor:

Thank you for your letter dated October 17, 2022, requesting a jurisdictional determination. Your letter represents that Belonging Medical Group is currently serving approximately 500 Vermonters across the state and offers opioid use disorder (OUD) and alcohol use disorder (AUD) medication-assisted treatment (MAT) within a group-based model of care by licensed professionals (LADS, 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. Belonging Medical Group offers a Vermont FLEX program, a collaborative grant program between DSU, Vermont Cares, The AIDS Project of Southern Vermont, and Better Life Partners. The Vermont FLEX program provides low barrier OUD treatment, grounded in the principles of harm reduction, for the hardest-to-reach communities who use drugs (PWUD). Currently all services, outside of the Vermont FLEX program, are offered via telehealth.

Belonging Medical Group's proposed project is to expand its services to become an identified Spoke within the Vermont Blueprint for Health Hub & Spoke system. The spoke services will be phased into several Health Service Areas across the state. It will continue to offer a hybrid model which allows for both in-person and telehealth services and MAT medications will continue not to be distributed onsite.

Based on the representations contained in the documents you have submitted, the project is subject to certificate of need (CON) review under 18 V.S.A. § 9434(a)(5).¹

¹ [On March 30, 2022, the Green Mountain Care Board voted to increase each of the monetary jurisdictional thresholds in 18 V.S.A. § 9434\(a\)-\(c\).](#)



The application must include a detailed description of the proposed project, the need for the project, the cost of the individual project components and the total project cost, and any financing arrangements. The application must also include an explanation of existing and new or expanded services, as well as a description of any renovation or fit-up components and health information technology components of the project.

Note that the Board is currently working to update the Health Resource Allocation Plan (HRAP), referenced in 18 V.S.A. § 9437(1)(C). Because the update is not yet completed, the application should address the following applicable standards from the current HRAP: 1.2, 1.3, 1.4, 1.6, 1.7, (1.9-1.12 if applicable), 1.8, 4.4, 4.5, and 4.6. Additionally, the statutory criteria set forth in 18 V.S.A. § 9437(1)-(5) and (9).

The application must address the Institute for Healthcare Improvement's Triple Aims: 1) improving the individual experience of care, 2) improving the health of populations, and 3) reducing the per capita costs of care for populations.

The Board requires submission of sufficient financial information to evaluate the project. For each of the financial documents noted below, specify the 12-month period for Latest Actual, projected Years 1, 2, and 3 and provide a summary of all financial assumptions that underlie the projections for each of the following:

- Profit and Loss Statements
- Revenue Projections
- Balance Sheets
- Cash Flows
- Operating Costs
- Most recent audited financial statement of parent entity (if applicable)

In addition, provide:

- Financial Table 1, Project Costs
- Financial Table 2, Financing Arrangement
- Financial Table 6A, 6B, and 6C, Revenue Source Projections
- Financial Table 7A, 7B, and 7C, Utilization Projections
- Financial Table 9A, 9B, and 9C, Staffing Projections
- Current Owner's Most Recent Audited Financial Statement

Once complete, please send your application to me electronically at donna.jerry@vermont.gov, and provide a three-hole punched hard copy with a Verification Under Oath to the Green Mountain Care Board, 144 State Street, Montpelier, Vermont 05602, Attention: Donna Jerry.

You also requested a jurisdictional determination for possible projects ahead of any Request for Proposal (RFP). Without specific details on the program(s) you may pursue through an RFP process, we cannot provide you with a determination. You would need to submit specific information about a proposed project separately and request a jurisdictional determination.



If you have further questions, please do not hesitate to contact me at 802-760-8162.

Sincerely,

s/ Donna Jerry

Donna Jerry

Senior Health Policy Analyst

cc. Laura Beliveau, Staff Attorney

