
DELIVERED ELECTRONICALLY

January 19, 2023

Mr. M. Bradford Ellis
Vernon Green Nursing Home
61 Greenway Drive
Vernon, VT 05354

RE: Docket No. GMCB-001-22con, Replacement of Vernon Green Skilled Nursing Facility, Project Cost: \$30,989,722

Dear Mr. Ellis:

Thank you for your application received on December 28, 2022. We are still reviewing architectural documents and will submit further questions under separate cover.

Please respond to the questions below.

1. The required financial tables are missing information for 2022-2025. Using the same 12-month period used for 2021 and 2026-2028, please revise all financial tables (3-7 A, B and C) to include the missing years and resubmit.
2. Financial tables 1 and 2 do not show a line item for demolition of the existing skilled nursing facility. Explain in detail whether the cost of demolishing the existing skilled nursing facility is included in the total project cost of \$30,989,722 and if so, identify the line item(s) and the cost included in the line item(s) for demolition. The cost of demolition should appear as a separate line item by renaming the "Renovation" line item as "Demolition." Please correct and resubmit.
3. Explain whether financial Tables 1 and 2 include the debt financing for both the commercial bank loan for construction of the replacement skilled nursing facility and the USDA permanent loan. Please explain in detail the terms and conditions of the commercial bank construction loan, including closing costs. Please also explain in detail whether the costs associated with both the commercial bank construction loan and the USDA loan are included in all applicable financial tables and in the total project cost of \$30,989,722. If these costs are not included, please correct the tables and resubmit.



4. It is stated that \$1.5 million in internal operating and investment reserves were spent to advance the development of this project. Explain in detail whether this amount is included or excluded in the total project cost of \$30,989,722 and if so, identify the line item(s) and specify the components that were included in the \$1.5 million spent to advance the development of the project.
5. It is stated that in addition to the \$30,989,722 for construction of a replacement skilled nursing facility using the Green House Model, that Vernon Homes is also undergoing a \$4 million renovation project to the assisted living facility on its campus and is replacing a failed septic system for \$2,597,000 that serves the facilities on its campus in Vernon. Explain in detail how Vernon Homes has the financial means to carry out these three projects without adversely impacting any existing services provided by the applicant. (Statutory Criterion 5)
6. Provide a complete copy of the Financial Feasibility Study completed by a third party.
7. Provide a complete copy of any marketing studies performed for this project in the past three years.
8. Provide a letter from Efficiency Vermont to demonstrate your work with that entity as it relates to this project.
9. Specify the entities that are providing the \$1,000,000 in grants and the terms and conditions for that grant(s). Specify the entity that is providing the \$1,000,000 Sponsor Loan and the terms and conditions for that loan.
10. The application mentions fundraising on page 75. What is the dollar amount goal identified for the fundraising initiative, what will the dollars be used for, and what is the anticipated time period for the fundraising initiative?
11. Based on the CMS Nursing Home Compare Quality Measures included in the application submitted dated October 2022, Vernon Green had some unfavorable results for its long-stay residents compared to Vermont facilities statewide. Vernon Green residents who received antipsychotic medication was at 32.2% compared to 16.1% statewide; its residents experiencing urinary tract infections was at 10.3% compared to 2.8% statewide; its residents losing control of bladder or bowels was at 83% compared to 49.1% statewide; its residents who have symptoms of depression was 31.5% compared to 12.7% statewide; and its residents receiving antianxiety or hypnotic medications was 28.7% compared to 16.1% statewide. Please provide a detailed explanation for each of these quality measures.
12. Explain in detail the extensive training of existing staff to support and embrace the transition to the “universal worker” concept used in the Green House Model to deliver required services at the replacement skilled nursing facility. Explain staff response to the



use of the “universal worker” model, and any anticipated negative impact on retaining existing staff during times when significant staffing challenges exist.

13. Based on the Staffing table, staff will be reduced from 71.55 to 63. On page 75, it is represented that for each 12-bed long term care unit/home, there will be 3 universal workers during the daytime hours, two in the evening hours and one during the overnight hours. In a table format, identify other 12-bed Green House Models (and state the facility name, city and state) and the number of universal worker staff assigned to each of the three shifts. Explain how staffing each unit/home with a single worker overnight will maintain patient safety and promote quality care.
14. Explain whether the existing facility has a standing resident council and whether the replacement facility will have a standing resident council. For both the current facility and the proposed replacement facility, identify the composition of the council, number of individuals from each constituency, how often the council meets, and how the information gathered from these meetings is used to improve quality and resident satisfaction at the facility.

In responding, restate the question in bold font and respond in unbolded font. Send an electronic copy to me at 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, GMCB

