



Choosing Health

**Northeastern Vermont
Regional Hospital**

5 April 2023

ELECTRONIC DELIVERY

Donna Jerry, Senior Health Policy Analyst
Green Mountain Care Board
144 State Street
Montpelier, VT 05602
donna.jerry@vermont.gov

**RE: Docket No. GMCB-005-23con
CON for Emergency Department and Laboratory expansion and
modernization**

Dear Ms. Jerry:

In connection with filing its application for a Certificate of Need ("CON") for our Emergency Department and Laboratory Expansion and Modernization, Northeastern Vermont Regional Hospital ("NVRH") respectfully requests expedited review of its application by the Green Mountain Care Board ("GMCB") pursuant to Green Mountain Care Board Rule §4.304.

Under Rule §4.304(1)(a), "an applicant seeking expedited review of an application must show, and the Board must determine, that (a) the application is likely to be uncontested and the proposed project does not substantially alter services." NVRH's application consists of modernization of the Emergency Department (ED), bringing spaces up to regulatory code and an additional three (3) treatment rooms, to meet departmental needs. The renovated expansion to the Laboratory is also to meet regulatory codes and improve operational efficiencies. NVRH is the only facility with an Emergency Room and Laboratory within our service area; therefore, we believe it is very unlikely our application will be contested.

Referring to 18 V.S.A. § 9440 (c)(5)(A) and GMBC Rule 4.304, please see our responses below.

Rule 4.304 Expedited Review

**1. An applicant seeking expedited review of an application must show,
and the Board must determine, that:**

**(a) the application is likely to be uncontested and the proposed
project does not substantially alter services;**

NVRH is expected to be uncontested as the proposed project does not substantially alter services within the Emergency Department or Laboratory. NVRH will be completing a routine expansion and renovation which does not expect to alter services provided. Our ED has not been significantly renovated since 1972. This project has been scaled to meet the current needs of our community and to bring our facility into Facility Guidelines Institute (FGI) code compliance in the ED and Laboratory areas. We remain the only ED and Laboratory service in our service area.

2. A project does not “substantially alter services” if:

(a) the project raises no significant health care policy or planning concerns;

The project does not raise significant health care policy or planning concerns as the NVRH project will not be altering services. With expansion and renovation, we are bringing into FGI code our facility and improving our patient’s experience.

(b)(i) the expenditures associated with the proposed project or action do not have a significant impact on the services provided, the cost of health care, or the financial strength of the applicant;

We anticipate the project will increase annual operating costs by approximately \$900,000. Here is a summary of the annual cost increases:

- Depreciation -\$360,000
- Interest -\$350,000
- Additional FTEs -\$190,000

NVRH has historically found ways to offset the impact of costs associated with other new projects in order to maintain a positive operating margin; therefore, we are confident savings will be achieved to offset most of the \$900,000 annual cost increase. However, a rate increase of .25% to .5%, in addition to standard annual rate increases, may be required to fund the higher operating costs. In our opinion, the benefits to the public derived from the project, which are detailed throughout this application, outweighs the additional rate increase of .25% to .5%.

(b)(ii) the project consists of the routine replacement of existing equipment that is depreciated, out-of-date or obsolete, or consists of the routine renovation, repair or maintenance of existing buildings and facilities.

NVRH will be performing routine renovations in both the ED and Laboratory, in addition to adding square footage in each area. This additional square footage is crucial in gaining FGI compliance.

Emergency Department

NVRH is proposing to expand the current footprint and capacity to meet current Facility Guidelines Institute (FGI) guidelines and the acuity needs of our community. Our current spaces do not meet today's FGI guidelines. The Emergency Department (ED) currently sees 13,000 patients annually. The current ED space is roughly 6,000 square feet (SF); the impacted area will be 9,051 SF in total. We are not anticipating services to change. However, we do expect improvement in our patient and family experience while visiting the ED. Increased capacity for our higher acuity patients as well as improved workspaces for team members.

The ED proposal includes the below benefits:

- Increasing exam rooms from 9 to 13, inclusive of 2 trauma rooms and 1 triage room
- Increasing patient restrooms from 1 to 3
- Increasing staffing station space
- Addition of a specific decontamination space
- Appropriate medication compounding area
- Consult space for families and community partners
- Additional equipment storage and increased staff break space
- Significantly increase patient privacy and confidentiality

Laboratory

NVRH is proposing to expand the current footprint of the Laboratory and redesign it for operational efficiency improvements. The current Laboratory footprint is 2,991 SF. The total planned renovation is 2,399 SF. The increased footprint will allow for improved departmental efficiencies, as well as becoming compliant with the College of American Pathologists (CAP), and Clinical Laboratory Improvement Amendments (CLIA) criteria for Laboratory storage and safe practice standards. The Laboratory currently performs 200,000 tests annually. We are not anticipating services to change. We do anticipate operations efficiency gains, as well as an improvement in our patient and family experience. We will be addressing workplace ergonomic needs within the project.

The Lab proposal includes the below benefits:

- Expanding clinical lab space
- Creating private phlebotomy draw spaces

- Adding a patient-specific restroom supporting specimen collection workflows
- A more spacious waiting room
- Increase storage for regulatory compliance

We believe NVRH is well-positioned to invest in our ED and Laboratory to improve the patient experience and continue our critical work caring for our community.

We thank the Green Mountain Care Board for considering our request for an expedited review of our project to help meet our community needs.

Sincerely,

A handwritten signature in dark ink, consisting of a large, stylized 'S' followed by a horizontal line extending to the right.

Shawn P. Tester, Chief Executive Officer
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