
DELIVERED ELECTRONICALLY

September 25, 2024

James Trimarchi, Director of Planning
Southwestern Vermont Medical Center
100 Hospital Drive
Bennington, VT 05201

RE: Docket No. GMCB-014-23con, Development of an Inpatient Mental Health Unit for Adolescents, Cost: \$9,543,006

Dear Mr. Trimarchi:

Thank you for your responses to questions to date. There are several substantive areas that still require further explanation and support. Please respond to the following questions.

1. The Feasibility Study assumed 14 inpatient beds for adolescents at the Retreat. The Retreat currently has 23 inpatient beds for adolescents that can flex to 27. Scenarios for more than 14 beds at the Retreat were not included in the feasibility study. Explain why different scenarios for the number of existing beds were not included in the feasibility study to determine the number of additional beds that may be needed at SVMC. Given the 23 beds at the Retreat, please work with the consultant to revise and specify the number of additional inpatient beds that are needed for Vermont adolescents.
2. In a table format, provide a full list of the mental health services and the physical health services that will be provided on-site at the unit. Explain in detail how available mental health and physical health services will be integrated, coordinated, and delivered during and after the inpatient stay.
3. Provide the following information:
 - a. A complete list of all services (clinical, educational, non-clinical, etc.) to be provided;
 - b. The provider type (including level and FTE) delivering each service including certification/licensure;
 - c. The frequency of provision for each service;
 - d. The duration of each service;



- e. Whether the service will be provided on or off-site (specify location if service is provided off-site);
 - f. Total staff required to appropriately staff the adolescent mental health unit and meet the co-occurring physical health needs of patients.
4. Regarding the primary mental health condition(s) and the co-occurring physical health condition(s) that adolescents seeking treatment at SVMC may have:
 - a. Provide a more detailed explanation regarding the mental health conditions SVMC intends to admit and not to admit.
 - b. Your application represents that only adolescents with “stable” physical health medical conditions will be admitted. Provide a clear definition of “stable physical health medical conditions” for adolescents presenting with co-occurring physical health conditions that SVMC will and will not admit and provide specific examples of each.
 - c. Explain how and by whom the admissions decisions will be made.
 - d. For patients who are not admitted, explain where SVMC will refer those adolescents and their families for care.
5. Provide a program schedule of activities hour by hour and the level of provider(s) providing each service from 7:00 a.m. through 10:00 p.m. for both weekdays and weekends.
6. Explain in detail how SVMC’s program is the same and how it will differ from the inpatient adolescent program at the Retreat.
7. Statutory Criterion 9 requires an applicant to explain how the project will support equal access to appropriate mental health care that meets standards of quality, access, and affordability equivalent to other components of health care as part of an integrated, holistic system of care, as appropriate. Explain in detail how the project will meet this criterion and provide examples.
8. GMCB Rule 4.000 § 4.402(3) identifies factors that the Board may consider in determining whether a project will serve the public good. Explain in detail how the project will meet 4.402(3)(a), (b, if applicable) (c), (d), (e) and (f).
9. Based on financial Table 7B (Utilization Projections), explain in detail what the projected monthly and annual occupancy rates (expressed as a percent) will be and what the associated number of utilized beds (of the 12) is projected to be in year 1, 2 and 3 of operation.
10. The Feasibility Study assumed a 15-day length of stay with 5% of patients having a long stay of 120 days. Based on financial Table 7B, provide a breakdown of the projected number/percent of adolescents that will likely have inpatient stays of 15 days, 30, 60, 90,



120 days in year 1, 2, and 3. Explain in detail any changes in anticipated programming and staffing based on shorter or longer length of stays, including educational requirements.

11. Provide a detailed explanation of your discharge planning process, and the facilities, programs, and levels of care available in Vermont for adolescents to receive the appropriate level of care following discharge from SVMC.
12. The Retreat estimates that once the SVMC program is in operation, the Retreat will experience annually at least a \$10 million loss in net patient revenues. To meet Statutory Criterion 2, please explain in more detail:
 - a. How SVMC's financial condition will sustain any financial burden likely to result from the completion of the project;.
 - b. The financial implications for the Retreat, overall;
 - c. The financial implications for the Retreat's adolescent inpatient program, specifically;
 - i. Include in this explanation the impact on the Retreat's services, expenditures, and charges;
 - ii. Explain whether the impact on the Retreat's services, expenditures, and charges is outweighed by the benefit of SVMC's project to the public.
13. SVMC has conceded that recruiting and retaining staff to operate the adolescent mental health unit will be challenging. (Q001, 4). Explain in more detail how SVMC will successfully recruit for each of the positions listed in your response to questions 3 and 10, above.

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, 1 National Life-Davis 3, Montpelier, Vermont 05633.

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

