

. STATE OF VERMONT  
GREEN MOUNTAIN CARE BOARD

In re: Application of Integrative Life Network, LLC )  
Request for Emergency CON to ) GMCB-006-23con  
Acquire 100% Interest in )  
Silver Pines Partners, LLC )  
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**CERTIFICATE OF NEED**

In accordance with Title 18, Chapter 221, Subchapter 5, other applicable laws, and the Statement of Decision and Order in this matter, the Green Mountain Care Board issues this certificate of need to Integrative Life Network, LLC (the applicant), subject to the conditions set forth below.

**Project Description and Scope**

The applicant seeks to purchase 100% of the ownership interest in Silver Pines Partners, LLC (Silver Pines), which owns and operates Sana at Stowe (Sana or “the facility”), a 32 bed (16 double rooms) medically assisted withdrawal substance use disorder and residential treatment facility located at 3430 Mountain Road in Stowe, Vermont. The acquisition is outlined in greater detail in the Statement of Decision and Order in this docket, incorporated herein and issued today by the Board.

**Project Conditions** [REDACTED]

The project as proposed, subject to the following conditions, meets the statutory criteria set forth in 18 V.S.A. § 9437:

1. The applicant shall develop and operate the project in strict compliance with its scope as described in the application, in other materials in the record submitted by the applicant, and in strict conformance with the Statement of Decision and Order issued today in this docket. This certificate of need is limited to the project and activities described therein.
2. Noncompliance with any provision of this certificate of need or with applicable ordinances, rules, laws, and regulations constitutes a violation of this certificate of need and may be cause for enforcement action pursuant to 18 V.S.A. §§ 9445, 9374(i), (j), and any other applicable law.
3. The Certificate of Need application fee of \$5,000 must be paid in full to the State of Vermont by or before June 2, 2023.

4. The applicant shall notify the Board within 30 days of the Closing Date (as referred to the Member Interest Purchase Agreement) has occurred. The Closing Date shall take place within three months of the date of issuance of this certificate of need.
5. The applicant shall consult with the Vermont Division of Substance Use (DSU) on the development of training and materials for Sana staff and shall establish connections to other treatment providers within Vermont's substance use disorder community/systems of care, including providers participating in Vermont's Hub and Spoke system for treatment of opioid use disorder. In each of the implementation reports described in paragraph 12 below, the applicant shall provide a detailed overview of all such activities.
6. The applicant shall establish referral connections with inpatient psychiatric treatment facilities, hospitals, and community mental health providers in Vermont and in other states where patients may be referred following discharge. In each of the implementation reports described in paragraph 12 below, the applicant shall provide a detailed overview of all such activities.
7. In each of the implementation reports described in paragraph 12 below, the applicant shall report on its efforts to connect with the Vermont Information Exchange (HIE) operated by Vermont Information Technology Leaders (VITL) for the purpose of achieving greater care coordination with other health care providers in the state.
8. The applicant shall provide a copy of the original Joint Commission report within 30 days of the Closing Date. The applicant shall annually provide proof of Sana's continued accreditation by the Joint Commission and any updated Joint Commission reports.
9. The applicant shall offer an admissions preference to Vermonters who meet Sana's admission criteria. In each of the implementation reports described in paragraph 12 below, the applicant shall provide the number of Vermonters who met admissions criteria but were not accepted to the program.
10. The applicant shall engage in negotiations with Blue Cross and Blue Shield of Vermont, Cigna, MVP, Medicaid, and Medicare for coverage of the Sana program. Following the conclusion of negotiations, the applicant shall include an update on the outcome of these negotiations in each of the implementation reports described in paragraph 12.
11. The applicant shall distribute annually no less than 1% of its annual net revenues to Vermont community organizations and programs addressing substance use disorder. In each implementation report described in paragraph 12, the applicant shall provide a summary of the development and membership of the independent board that will be established to review and recommend disbursements to Vermont substance use disorder organizations; identify the total dollar amount available for disbursement and the total amount dispersed; identify the recipients, the amount of funds dispersed to each organization; and the purpose of the distribution.

12. The applicant shall file implementation reports with the Board beginning six months from the date of this certificate of need and at six-month intervals thereafter through July 14, 2027. The implementation reports shall include the following:

- a. An overview of the project, including any changes in financing, and information and analysis demonstrating that the project fully complies with the scope as approved by the Board in this certificate of need.
- b. The information required in Conditions 5- 11 of this certificate of need.
- c. A spreadsheet listing each individual line item in the annual operating expense budget approved in Docket No. GMCB-016-19con, and for each expenditure: 1) the total annual budget approved by the Board; 2) budget for reporting period based on annual budget; 3) actual dollars spent during current reporting period (specify beginning and ending dates); 4) the dollar amount spent through all previous reporting periods for each annual budget period; 5) the cumulative dollar amount spent to date in annual budget; 6) the amount remaining in dollars in annual budget; and 7) the amount in annual budget remaining as a percentage.
- d. A spreadsheet showing, by line item, the projected, actual, and cumulative revenues for the reporting period and a spreadsheet showing, by line item, the projected, actual, and cumulative expenses for the reporting period.
- e. In a table format, the number and percentage of program participants who are Vermont residents and who are not Vermont residents.
- f. A table showing payor mix (commercial, private pay, Medicaid, Medicare) for each for the reporting period, indicating both the number of patients covered by and the percentage of total revenue earned by payor.
- g. Include the table below and expand it to report the published rate, estimated rate and actual average daily charge and actual daily reimbursement rate for each category listed below.

	Published Rate	Estimated Rate
<b>Private Pay (PP) Detox (3.7)</b>		
<b>PP Detox + RES (3.5)</b>		
<b>PP RES (3.5)</b>		
<b>In Network (INN) Detox (3.7)</b>		
<b>INN Detox + RES (3.5)</b>		
<b>INN RES (3.5)</b>		
<b>Out of Network (OON) Detox (3.7)</b>		
<b>OON Detox + RES (3.5)</b>		
<b>OON RES (3.5)</b>		



- h. In a table format, for the reporting period and cumulatively, and broken down by Vermont residents and non-Vermont residents, 1) the number of emergency transports made to hospital emergency departments (specify hospitals); 2) the number of referrals for admission to inpatient psychiatric units; and 3) the number of referrals made to Vermont Community/Systems of Care by type of service.
  - i. A spreadsheet showing the equity distributions paid to investors.
  - j. Notification of any proposed change to the licensure of the 32 beds licensed by the Department of Disabilities, Aging and Independent Living.
13. This certificate of need is not transferable or assignable and is issued only for the premises and entity named in the application.
14. If the applicant contemplates or becomes aware of a nonmaterial change, as defined in 18 V.S.A. § 9432(12), or a material change as defined in 18 V.S.A. § 9432(11), to the scope or cost of the project described in its application and as designated in this certificate of need, the applicant shall file a notice of such change immediately with the Board. The Board shall thereafter review the contemplated change and advise the applicant whether the proposed change is subject to additional review. No new programs or services including but not limited to Partial Hospitalization Programs (PHP) or Intensive Outpatient Programs (IOP) can be implemented without notifying the Board in advance in writing and receiving Board approval.
15. The Board may, after the applicant is provided notice and an opportunity to be heard, make such further orders as are necessary or desirable to accomplish the purposes of this certificate of need and to ensure compliance with its terms and conditions.
16. All reports, notices, forms, information, or submissions of any kind required to be submitted to the Board as a condition of this certificate of need shall be signed and verified by the applicant’s chief executive officer, or by his or her designated representative.
17. The conditions contained in this certificate of need shall remain in effect for the duration of the reporting period set forth in Condition 12, above.

**SO ORDERED.**

Dated: May 15, 2023 at Montpelier, Vermont.

s/ Owen Foster, Chair )  
 ) GREEN MOUNTAIN  
 s/ Jessica Holmes ) CARE BOARD  
 ) OF VERMONT  
 s/ Robin Lunge )  
 )  
 s/ David Murman )  
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s/ Thom Walsh )

Filed: May 15, 2023

Attest: /s/ Jean Stetter, Administrative Services Director

