

PO Box 614  
Brownsville, VT 05037

May 3, 2016

Ms. Donna Jerry  
Green Mountain Care Board  
89 Main St  
Montpelier, VT 05620

Dear Ms. Jerry:

I am writing on behalf of Confluence Behavioral Health LLC (CBH). CBH is proposing to operate a wilderness therapy program for young adult males aged 18-28. The proposed programming is short-term, ranging from 8 to 12 weeks. All participants enroll voluntarily.

Confluence is seeking licensure from the Department of Aging and Independent Living to operate as Therapeutic Community Residence accommodating 12 participants. As a wilderness therapy program, Confluence does not fit into DAIL's regulatory outlines. However, CBH has requested their oversight in this project and we are working with DAIL to propose regulations that apply to wilderness therapy programming. The anticipated opening date is June 2016.

CBH has secured a zoning permit from the town of Thetford. The ACT 250 commission has issued a ruling of non-jurisdiction. CBH has also been in contact with the Department of Disabilities, Aging and Independent Living (DAIL).

Confluence's main office and residential facility is located at 1646 Gove Hill Rd., Thetford, VT. The facility is where clinical services are provided including initial assessments and diagnosis, weekly individual and daily group and adventure-based therapy sessions. Participants will stay at this location between other programming in which they travel to other locations for adventure and wilderness experiences. They will also be "on property" during inclement weather when outdoor travel is prohibited.

This additional programming will occur at various locations throughout the Northeast where participants will engage in outdoor activities such as backpacking, bicycling, paddling, and skiing. There are no construction plans at the property, though there are basic updates needed to the main lodge on the Thetford property. These include paint, new hardware (toilets and sinks) and fixtures (door knobs, lighting).

Confluence integrates adventure-based counseling and traditional talk-based modalities in an experiential therapeutic community that serves to treat participants suffering from psychiatric

diagnoses. Applicants may have experienced a range of life interruptions caused by emotional health challenges, poor self esteem, a lack of self confidence, negative peer groups, relational difficulties, lack of motivation or purpose, substance use, grief/loss/trauma or difficulty maintaining in college, work or home settings. Applicants may experience symptoms related to a wide range of mental health disorders including including depression, anxiety, ADHD, or bipolar disorder.

Confluence is not a psychiatric hospital nor is it a substance abuse treatment center. Participants with psychotic disorders or who are at risk for self harm or harm to others are not appropriate for Confluence. Participants needing substance abuse specific treatment for a primary substance use disorder will be referred to other appropriate treatment options. Confluence does not provide psychiatry.

Each week, participants will work with mental health counselors in individual and group counseling. Additionally "field staff" will provide coaching that supports the participant's' individualized plan of care. All activities support the treatment plan and are employed as clinical interventions. All clinical work will be under the supervision or direct care of a licensed mental health practitioner.

Participants will receive medication assistance from trained staff delegated this responsibility from the on-staff Medical Coordinator, a registered nurse. Any medical needs, urgent or otherwise, will be handled through a local physician, urgent care facilities or emergency departments. Emergency medical and emergency psychiatric care will be provided by Dartmouth Hitchcock Medical Center.

Total operating costs for the first year is \$472,637. Operating costs are \$478,064 and \$489,114 for the second and third year respectively. The operating figure supports one group of up to 12 participants. In the first year our aim is to have an average daily enrollment of 6 participants, 8 in the second and 10 in the third. We are seeking licensure from DAIL for 12 participants. The project is financed with the owner's personal capital. There are no outside investors involved.

Confluence does not bill private insurance or medicaid/medicare. Families may request supporting documentation so they can seek reimbursement from their insurers for clinical time spent with a licensed mental health provider in counseling sessions.

Participants may be referred from around the country. Clients are those who are attending colleges in the Northeast and are struggling to stay enrolled. Clients are expected to work with an educational consultant who assesses participant need and identifies appropriate referral options. Additionally, Confluence's clinical director and admissions staff screen potential participants to ensure the programming meets their individualized needs. Each participant will also complete a psychosocial assessment upon admission.

This project is being developed in response to growing challenges faced by young adults in managing the transition from adolescence to adulthood. Evidence of this need is supported by professional association publications, in academic literature and is well documented in the popular press. In a 2012 white paper from NAMI, it is reported that 64% of college dropouts are no longer attending due to mental health related reason. The report also indicates that 73% of respondents experienced some form of mental health crisis. Only 50% of respondents in the survey had discussed their mental health challenges with their college (College Students Speak: A Survey Report on Mental Health. 2012, NAMI). Additionally, individual conversations with referring professionals have corroborated the demand for services. They have indicated an increased need for programs addressing life transitions for young adults, as families requesting referral to young adult programs.

Wilderness therapy has been demonstrated as an effective modality for treating mental health disorders in young adults. In a recent study, the authors write that "wilderness therapy has a positive effect on young adult's mood, interpersonal relationships, social skills, and behavioral difficulties... [and that] the client's relationship with their therapist, healthy life skills, and desire to change increased, while their distorted cognitions diminished over the course of therapy" (Efficacy of Wilderness Therapy for Young Adults: A First Look, 2013).

Based on the information above, the applicants request the Green Mountain Care board find the planned programming for Confluence Behavioral Health, LLC does not fall within the jurisdiction for the Certificate of Need.

Thank you very much for your consideration. If you have additional questions, or should require additional information please let us know.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "William Brown", with a long horizontal flourish extending to the right.

William Brown  
Confluence Behavioral Health

Enclosure  
Budget Summary

