

---

**From:** Bloom, Crystal <[Crystal.Bloom@huschblackwell.com](mailto:Crystal.Bloom@huschblackwell.com)>

**Sent:** Monday, January 23, 2023 5:30 PM

**To:** Renaud, Dennis (DPH) <[Dennis.Renaud@mass.gov](mailto:Dennis.Renaud@mass.gov)>; Rodman, Rebecca (DPH) <[rebecca.rodman@mass.gov](mailto:rebecca.rodman@mass.gov)>; Conover, Lynn (DPH) <[lynn.conover@mass.gov](mailto:lynn.conover@mass.gov)>

**Cc:** Ciolfi, Kasey <[Kasey.Ciolfi@huschblackwell.com](mailto:Kasey.Ciolfi@huschblackwell.com)>

**Subject:** Navigator Homes of MV

**CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.**

Hello,

Thanks again for the discussion regarding the CHI requirement for Navigator Homes of Martha's Vineyard (NHMV). THE CHI contribution tied to the project is \$1,605,913 and is the largest CHI for a long term care substantial capital expenditure to date. The project is for the replacement of Martha's Vineyard's only skilled nursing facility. The replacement facility will be built and operated under the Green House Model of Care which is tied to improved health outcomes and quality of life as detailed throughout the DoN filing. This model of care moves away from an institutional care setting and allows for a homelike environment and opportunities for more social involvement of residents addressing both the physical and mental health needs of residents.

Due to its location on a geographically isolated island, an integral component of the new facility operation is the development of workforce housing to mitigate the high cost of living on the island and address historical staffing issues that have been exacerbated by the pandemic. As we discussed, we request the Department to consider acknowledging that the workforce housing satisfies part of the CHI requirement for the NHMV DoN. NHMV is committed to supporting the creation of workforce housing on Martha's Vineyard to provide subsidize rent to its employees. This commitment is consistent with the Department's DoN Health Priorities of housing and employment. The workforce housing will address the need for affordable housing and allow individuals who seek employment on the island to live in the community. This need was verified by the 2022 CHNA conducted by Martha's Vineyard Hospital.

Please find additional information regarding the findings of the Martha's Vineyard Hospital CHNA and the plan for workforce housing that is related to the proposed DoN project.

2022 Community Health Needs Assessment conducted by Martha's Vineyard Hospital:

- Housing was identified as one of the top four community health needs on the island.
- The key informants explained that creating affordable housing will help to alleviate stress and the difficult choices residents are making between housing costs and other living and medical expenses. They further argued that, if affordable housing were available, it would be easier to attract and retain primary care providers, behavioral health clinicians, and medical specialists and healthcare staff, including culturally and linguistically diverse providers and staff who are so critically needed.
- Housing was the second most commonly reported need among MVH patients who were screened for SDOH. Community survey respondents were asked to select from among a number of issues that are challenges in their own lives; the third most frequently selected issue among year-round residents was housing (at 19.3%).
- While the key informants did not discuss job opportunities as a key to improving community health, they did note that ... residents often have to work multiple jobs to afford the cost of living on the island. Most of the key informants' discussion of jobs centered on the difficulty of attracting people to fill healthcare and other positions on the island because housing is scarce and unaffordable.
- The potential closing of Windemere, the nursing and rehabilitation center on the island, is a stressor since the Navigator Homes project has not yet broken ground. The key informants said that island residents are excited for Navigator Homes, as it will provide housing for its own staff as well as comprehensive services for older adults. However, the informants fear that it won't be open soon enough to care for many seniors currently living on the island.

Proposed Workforce Housing:

- A \$25M commitment is being made to establish workforce housing on Martha's Vineyard to serve the proposed relocated skilled nursing facility as well as Martha's Vineyard Hospital.

- The housing will consist of 75 bedrooms, of which Navigator Homes of Martha's Vineyard (NHMV) is committed to rent 30 bedrooms.
- Dukes County Regional Housing Authority ("DCRHA") will process all applications for housing and select the applicants for placement in available units. DHRCA will charge of this service. Rents will be set by DCRHA.
- Rents will be subsidized, with 85% of the housing targeted to staff earning less than 120% of the Area Median Income. The Martha's Vineyard Commission considers these income levels to be "community housing" and has approved the proposed housing.
- NHMV will be responsible for its portion of the housing operating costs that is not offset by rents collected.

We hope this information is helpful. Please contact me if you have any questions.

Thanks

**Crystal Bloom**  
**Partner**

**HUSCH BLACKWELL LLP**

One Beacon Street,  
Suite 1320  
Boston, MA 02108-3106

Direct: [617-598-6783](tel:617-598-6783)

Fax: [617-720-5092](tel:617-720-5092)

[Crystal.Bloom@huschblackwell.com](mailto:Crystal.Bloom@huschblackwell.com)

[huschblackwell.com](http://huschblackwell.com)

[vBio|yCard](#)

**Healthcare, Life Sciences & Education**

**Healthcare Regulatory**

**Husch Blackwell is redefining partnership and client service. With 800+ lawyers in more than 20 offices across the United States, including [The Link](#) virtual office, we are a national law firm with a coast-to-coast footprint focused on tackling the most complex business challenges.**