



# Legislature of the Virgin Islands

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## POST AUDIT DIVISION

June 10, 2025

### MEMORANDUM

**TO:** Honorable Novelle E. Francis, Jr.  
Chairman, Committee on Budget, Appropriations and Finance  
36<sup>th</sup> Legislature of the Virgin Islands

**FROM:** Post Audit Division

**SUBJECT: Bill No. 36-0025** – An Act appropriating \$90,000 from the General Fund of the Treasury of the Government of the Virgin Islands to the Virgin Islands Department of Human Services to purchase all-in-one mobile health, wellness, and personal safety devices for Virgin Islands senior citizens and other vulnerable residents, and pay the annual service associated with maintenance of the devices

### BACKGROUND

Numera Libris 2 is a mobile personal emergency response system (mPERS) developed by Numera, a division of Nortek Security & Control, designed to provide real-time safety, health monitoring, and emergency communication for at-risk populations such as seniors, individuals with disabilities, and patients with chronic conditions. Key features of the system include:

| Fall Detection                          | Two-Way Voice Communication             | GPS/Wi-Fi Location Tracking                  | Health Monitoring Alerts         | Nationwide Cellular Coverage                  |
|-----------------------------------------|-----------------------------------------|----------------------------------------------|----------------------------------|-----------------------------------------------|
|                                         |                                         |                                              | Tracks Motion                    | Dependent upon 4G LTE networks for mobile use |
| Built-In Sensors                        | Built-In Speaker/Microphone             | Indoor/Outdoor Instant locator               | Tracks Activity Levels           | <b>Wearable/Portable</b>                      |
| Ability to detect falls                 | Direct Communication w/First Responders | Useful for patients wandering patients       | Sends Alerts to Caregivers       | Compact & Lightweight                         |
| Automatically initiate emergency alerts | Direct Access to Monitoring Personnel   | Benefits to those with cognitive impairments | Detect/Report Irregular Patterns | Discreet and Comfortable for daily use        |

## ANALYSIS

### Financial Considerations

- **Estimated Unit Cost:** \$150–\$200 per device, based on market rates
- **Service & Monitoring Fee:** Approximately \$25 per month per unit
- **Proposed Allocation:** \$90,000

### *Scenario#1*

Assuming an outright purchase of the device at **\$150 per device** and a 12-month monitoring service at \$25/month (\$300 annually)

- Total Annual Cost per patient:  $\$150 + \$300 = \$450$
- Appropriation could support approximately **200 individuals** with both the hardware and one year of service.

### *Scenario#2*

Assuming an outright purchase of the device at **\$200 per device** and a 12-month monitoring service at \$25/month (\$300 annually)

- Total Annual Cost per patient:  $\$200 + \$300 = \$500$
- Appropriation could support approximately **150 individuals** with both the hardware and one year of service.

Implementing a mobile personal emergency response system in the US Virgin Islands provides critical benefits but also presents several challenges that must be addressed to ensure deployment and long-term sustainability.

| Challenges of Implementing the Numera Libris 2 mPERS Program |                                                                                                                                                                                                                                                                                                                           |
|--------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Telecommunication and Connectivity Limitation</b>         | The system relies on 4G LTE network to perform effectively. Limited or unreliable signal strength depending on the location of the patient may result in inconsistent cellular coverage. Additionally, disruptions to cellular towers render the devices inoperable unless paired with disaster-resilient infrastructure. |
| <b>Infrastructure and Support Systems</b>                    | Effective deployment requires a 24/7 monitoring system, and a well-structured device distribution and maintenance logistics plan.                                                                                                                                                                                         |
| <b>Training &amp; User Adoption</b>                          | Digital literacy barriers in relation to ease and comfort with wearable technology and consistent use on a daily basis for the elderly and most vulnerable users.                                                                                                                                                         |
| <b>Funding &amp; Sustainability</b>                          | Concerns about maintaining the long-term costs of annual service subscriptions, replacements, and software updates.                                                                                                                                                                                                       |
| <b>Eligibility Concerns</b>                                  | Fair allocations across the territory. What is the eligibility framework or the selection process?                                                                                                                                                                                                                        |
| <b>Data Privacy</b>                                          | The collection of sensitive personal and health related information; as well as location tracking.                                                                                                                                                                                                                        |

## SUMMARY

**Bill No. 36-0025** proposes to appropriate **\$75,000** from the General Fund to purchase all-in-one mobile health, wellness, and personal safety devices; and **\$15,000** to pay the annual service fee associated with maintaining the devices; for a total one-time appropriation of **\$90,000**.

Information pertaining to the purchase of the device was not disclosed, however, inquiries made to the developer presented the Post Audit Division with low to mid-range pricing options.

| Category            | Estimated Cost        | Units Covered   |
|---------------------|-----------------------|-----------------|
| Device Purchase     | \$150 x 200 persons   | \$30,000        |
| Annual Service Fee  | \$25/month x 12 x 200 | \$60,000        |
| <b>Total (Est.)</b> |                       | <b>\$90,000</b> |

| Category            | Estimated Cost        | Units Covered   |
|---------------------|-----------------------|-----------------|
| Device Purchase     | \$200 x 150 persons   | \$30,000        |
| Annual Service Fee  | \$25/month x 12 x 200 | \$60,000        |
| <b>Total (Est.)</b> |                       | <b>\$90,000</b> |

The Numera Libris 2 mPERS program has the potential to significantly improve safety and independence for the Virgin Islands' most vulnerable residents, however, successful implementation requires such factors as:

- Longterm funding and sustainability
- Transparent eligibility guidelines
- An implementation and deployment plan
- Strong data privacy safeguards
- Cross-agency coordination with healthcare, emergency response, and the Department of Human Services Adult Protective Services Staff and the Office of Senior Citizens Affairs
- Telecommunication and ongoing connectivity
  - Effectiveness of the device in the region
  - 4GLTE compatibility with featured networks-AT&T, Verizon, Telus

While the intent of the proposed legislation to fund mobile personal emergency response devices for the Virgin Islands' senior and vulnerable populations is commendable, the measure **cannot be recommended for approval in its current form** due to several unresolved issues.

First, the legislation lacks a **clear implementation framework**, including eligibility criteria, geographic distribution strategy, and the administrative structure needed to ensure equitable and efficient deployment of the devices. Without a defined plan, there is a significant risk of

**misallocation or underutilization of resources**, especially given the acknowledgement that devices were previously paid for and currently remain unsupported due to funding challenges..

Second, although the **\$90,000** appropriation provides a substantial starting point, it is insufficient to **sustain ongoing service fees** or to scale the program beyond one year without additional funding. This raise concerns surrounding the true cost of implementing the measure and its fiscal impact on the General Fund, which likely exceeds the pricing assumptions outlined in this analysis and may lead to future funding shortfalls or programs discontinuity.

Lastly, the absence of specific partnerships or commitments from monitoring service providers or healthcare agencies highlights potential challenges about the **feasibility of emergency response integration** and user support, both of which are critical to the success of **Bill No. 36-0025**.

A handwritten signature in blue ink, appearing to read 'Theodora Philip', with a stylized flourish at the end.

Theodora Philip, DBA  
Post Auditor