

LOCAL BUSINESSES & ASSOCIATIONS



Vermont State Employees' Association

100 North Main Street, Montpelier, VT 05602

Phone: (802) 223-1147

Fax: (802) 223-1148

Website: www.vsea.org

Al Gobeille
Chair, Green Mountain Care Board
89 Main Street, Third Floor, City Center
Montpelier, Vermont 05620

Dear Mr. Gobeille,

On behalf of the Vermont State Employees Association, an organization that represents approximately 25,000 consumers of health care in Vermont, we are writing in support of the Certificate Of Need application to establish a freestanding ambulatory surgery center in Chittenden County owned and operated by local independent physicians.

As good stewards of our members benefits, with acute awareness of the pressures on health care costs, and with a strong commitment to quality health care for our members, we are convinced that establishing an ambulatory surgery center would provide a lower cost, high quality consumer option for our members. Currently, Vermont is last in the nation in terms of access to non-hospital based alternatives for outpatient surgical procedures. This fact exists despite the trend toward lower cost, high quality surgical centers across the country and in our region. As we look at controlling costs associated with health care, the lack of such options is something that Vermont must begin to change.

VSEA values our community hospitals and understands the important role they play. However, we are convinced that there is room for more outpatient care options in Chittenden County than solely those offered by the University of Vermont Medical Center, and that the benefits of establishing such a center are compelling for our members and Vermonters more broadly.

Thank you for your consideration of this matter and we look forward to having this option available to our members and their families.

On Behalf of the Board of Trustees
and Members of VSEA,

A handwritten signature in cursive script that reads "Shelley Martin".

Shelley Martin
President

On Behalf of the Benefit Advisory
Committee,

A handwritten signature in cursive script that reads "Dave Bellini".

Dave Bellini
Chair



The Vermont Education Health Initiative

52 Pike Drive, Berlin, VT 05602
802-223-5040

Vermont-National Education Association / Vermont School Boards Insurance Trust

Dear Members of the Green Mountain Care Board:

The Vermont Education Health Initiative (VEHI) provides comprehensive health benefit plans for nearly 43,000 active and retired Vermont education employees and their dependents. This self-funded purchasing trust is managed jointly by the Vermont School Boards Insurance Trust (VSBIT) and the Vermont-National Education Association (Vermont-NEA).

On behalf of VEHI, we are writing to express our support for a recent Certificate of Need Application, which, if approved, would establish an independent **Ambulatory Surgical Center** in Chittenden County.

As fiduciaries for VEHI and its members, it is incumbent upon us to advocate for health care options that are of high quality and can deliver medical services at a lower cost. We understand that ASCs are operating effectively and safely across the nation, and throughout our region, and are providing cost savings.

We are convinced that an outpatient surgical option in Chittenden County would be an affordable and convenient option for the school district members of VEHI and their employees, for retirees in the Vermont State Teachers' Retirement System, and, more generally, for the people of Vermont. Further, being able to deliver excellent health care more affordably to our members and subscribers would strengthen VEHI fiscally and, thus, help us to control premium growth, which in turn would contribute to reducing budgetary pressures on local tax payers.

Establishing an ASC in Chittenden County makes sense, medically and financially. It is an idea whose time has come for Vermont.

Sincerely,

Laura Soares
VSBIT/VEHI

Mark Hage
Vermont-NEA/VEHI

Mr. Al Gobeille
Chair, Green Mountain Care Board
89 Main Street, Third Floor, City Center
Montpelier, Vermont 05620

Dear Chairman Gobeille,

I am writing this letter to share our strong support for granting a Certificate of Need to build an ambulatory care center in the greater Burlington area. Based on our discussions with the applicant's management team, and our experience and research into the success of ambulatory care centers in other states, we believe that a facility like this will generate significant financial savings for Burton and our 400 Burlington-based employees, and this center will be able to provide equally or more efficient and effective health care outcomes as compared to the current outpatient surgery options in the local Burlington area.

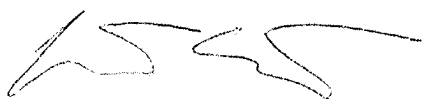
Besides the 400 employees working out of our Burlington headquarters, we have another 200 employees throughout the United States, many of whom regularly take advantage of these types of facilities. Our experience is that these centers are able to expedite the scheduling process, reduce the time spent waiting/prepping/recovering by both staff and patients, and significantly reduce the costs of procedures performed in the facilities. I recently spoke to an employee who had a routine outpatient procedure at an ambulatory care center, and paid less than half of what it would have cost at a local hospital. We have fully embraced consumer-driven approaches to our health plans, and therefore these savings will be shared equally by the company, and by our employees.

We also believe that the independent physicians proposing to open the Green Mountain Surgery Center are part of a well-managed network, with the staff and expertise to support a project like this and bring it online successfully. Many of our employees have long-standing and very positive relationships with independent physicians from the HealthFirst provider network, and therefore we are very supportive of their plans regarding this ambulatory care center.

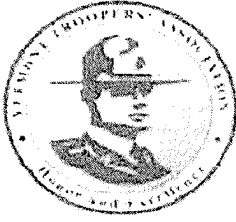
In addition to our direct experience with our employees in other states, and in Vermont with members of the HealthFirst network, we have reviewed a lot of data regarding the success of ambulatory care centers and believe this is a solid approach that aligns very well with Vermont's current focus on improving health care delivery and reducing costs. In fact I'm a bit baffled why it's taken this long to get a solid proposal on the table...

For these reasons, we are fully backing the Green Mountain Surgery Center's plans and requesting your support in embracing their proposal and expediting the approval process to the full extent possible. I would be happy to discuss Burton's perspective with you in more detail and you can reach me anytime at justinw@burton.com, 802-651-0499 (office) or 802-922-0713 (mobile).

Best regards,



Justin Worthley
Vice President – Human Resources



VERMONT TROOPERS' ASSOCIATION, INC.

7 Baldwin Street | P.O. Box 1474 | Montpelier, VT 05601

Executive Board

Michael O'Neil, President

Matt Denis, Vice-President

Todd Wilkins, Treasurer

Darren Annis, Secretary

March 18, 2015

Al Gobeille
Chair, Green Mountain Care Board
89 Main Street, Third Floor, City Center
Montpelier, Vermont 05620

Dear Mr. Gobeille,

On behalf of the Vermont Troopers association, an organization that represents approximately 600 consumers of health care in Vermont, Troopers and their families, we would like to express our support for the establishment of a freestanding ambulatory surgery center in Chittenden County owned and operated by local physicians.

Many of our members living throughout Vermont can access such lower cost, high quality sites of care in other states. For our members, concerned about both cost and quality, it only makes sense that such a surgical center is available in the Chittenden County region. We think the establishment of this center is good for our members, their families and for Vermonters, and is a common sense option that can provide both excellent care in a more cost effective setting.

Sincerely,

Michael O'Neil
President, Vermont Troopers Association



March 31, 2017

Green Mountain Care Board
89 Main Street, Third Floor
Montpelier, VT 05620

Re: Green Mountain Surgery Center
Docket No. GMCB-012-16con

Dear Members of the Green Mountain Care Board:

I am writing to express strong support for the Green Mountain Surgery Center's pending application for a Certificate of Need.

NFP (formerly known in Vermont as Fleischer Jacobs Group and Hackett, Valine and MacDonald) is a national corporate benefits organization working with hundreds of Vermont employers to bring comprehensive and cost effective benefit packages to their employees - health insurance being the key to any benefit package.

We continue to see the detrimental impact of rising health care costs on employers and their employees. The Green Mountain Surgery Center would offer an alternative setting in which to receive care and the ability to consider cost when making such decisions. With most employers offering some version of High Deductible Health Plans (with Health Savings and/or Reimbursement Accounts) this choice would be very meaningful for both the employer and employee.

NFP very much supports our local hospitals but also believes that an ambulatory surgical center would provide another option for individuals making informed choices when seeking the right care, in the right setting and at the best price.

I appreciate your consideration of the Green Mountain Surgery Center's CON application and your efforts to bring quality, affordable options to Vermont's health care system.

Sincerely,

A handwritten signature in cursive script that reads "Mitchell R. Fleischer".

Mitchell R. Fleischer
Managing Director



February 1, 2017

Mr. Alfred Gobeille, Chairman
Ms. Suzanne Barrett, Executive Director
Green Mountain Care Board
89 Main Street
Montpelier, Vermont 05620

RE: Green Mountain Surgery Center Pending CON Application

Dear Mr. Gobeille, Ms. Barrett and Members of the Green Mountain Care Board

I am pleased to offer this letter of support on behalf of ReArch Company with regard to granting a Certificate of Need to construct an outpatient surgical center in Colchester – specifically the Green Mountain Surgery Center. We believe a facility such as this will create positive competition for this type of health care in the greater Burlington area thus generating appropriate savings for both companies and patients. It will offer more efficient and effective health care options which will likely cause any competitors to follow suit for the financial savings and betterment of the community.

ReArch Company is a rapidly growing real estate development, construction and property management firm based in South Burlington, Vermont. Our number of employees has doubled over the past two years, to over thirty, for which we provide a premium health care plan as part of our benefits package at no cost to the employee. We are very proud of this accomplishment and are striving to continue this growth as well as benefit offering. Affordable health care is a key component in our ability to achieve this as a company and we see projects such as the Green Mountain Surgery Center as the means in which Vermont can accomplish this.

ReArch Company is fully backing the efforts of Green Mountain Surgery Center to provide a more competitive outpatient health care service and are respectfully requesting your support of their CON application as well as expediting the approval process to the extent possible.

I would personally be pleased to discuss our position and support in greater detail should you wish to contact me.

Sincerely,

A handwritten signature in dark ink, appearing to read 'John R. Illick', is written over a light blue horizontal line.

John R. Illick
Owner
ReArch Company



BURLINGTON
HOUSING
AUTHORITY

affordable housing for all

February 10, 2016

21 Main Street

Burlington, VT 05401-8408

tel: 802.864.0539

fax: 802.554.1286

www.burlingtonhousing.org

Green Mountain Care Board
89 Main Street, Third Floor, City Center
Montpelier, Vermont 05620

Dear Members of the Green Mountain Care Board:

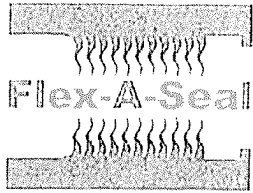
The Burlington Housing Authority is Vermont's oldest and largest municipally-based housing authority. Created in 1961, BHA has been providing affordable housing for over fifty years to individuals and families in the City of Burlington and surrounding communities. We have over 50 employees for which we provide comprehensive health insurance. Over the last few years the turbulence in health insurance has caused us to reexamine how we provide insurance to our employees and how we address the cost of such insurance.

This past year we decided to move to a self-funded insurance plan in an effort to maintain the highest possible level of benefits, at the most affordable price. In searching for ways to strike this balance we have learned about the proposed independent outpatient surgical center (Green Mountain Surgery Center) whose application is currently pending in front of the Board. I write in support of Green Mountain Surgery Center's application because a high quality, lower cost option for care is exactly the type of innovating thinking that we need to utilize if we are going to continue providing quality health care coverage for our employees. For organizations such as ours, in light of increasing budgetary pressures, we need all appropriate tools to control our costs while fully supporting our employees.

Thank you for your consideration of this letter. We look forward to hearing about the status of this proposal.

Sincerely,

Paul Dettman
Executive Director



Green Mountain Care Board
89 Main Street, Third Floor,
City Center Montpelier, Vermont 05620

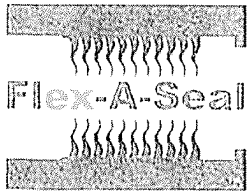
April 21, 2016

Dear Members of the Green Mountain Care Board:

I would like to voice my strong support for granting a Certificate of Need to the proposed Green Mountain Surgery Center. I am writing as founder and CEO of Flex-a-Seal, Inc., a mechanical seal manufacturer located in Essex Junction. I founded the company in Ormond Beach, Florida in 1983, but quickly made the decision to move the company to Vermont because it is a place I love and where my family has history. Today, our manufacturing plant in Essex is 27,000 square feet and employing approximately 100 people. As a business owner and long-time Vermont resident, I believe the Green Mountain Surgery Center would have a positive impact on our employees, their families and the community.

Based on my conversations with the applicant's team and my own research, I understand that an ambulatory surgery center would generate significant savings for Flex-a-Seal and its employees who live throughout the counties of Chittenden, Franklin, Grand Isle, and Lamoille. Beyond the savings, the outpatient surgery center would provide a high-quality, safe, and convenient alternative to the hospital for basic procedures such as preventative cancer screenings and minor operations.

My company has always been committed to providing the best health care plans possible for our employees. There are a variety of costs associated with running a business, and it is normal to see costs fluctuate. However, in the past several years the cost of health care has increased at a concerning rate. It is vitally important to the economic fabric of the state that we find ways to lower health care costs and improve our health care system. I believe an ambulatory surgery center is a significant step in the right direction: a high-quality, low-cost alternative. It's good for my employees and good for my business.

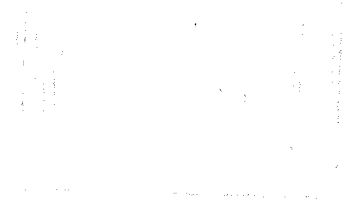


I fully support the Green Mountain Surgery Center and urge the Board approve the application so they can move forward with the exciting project.

Sincerely,

A handwritten signature in black ink, appearing to read "H. Slauson, III". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Henry M. Slauson, III
Founder & CEO, Flex-a-Seal, Inc.



Al Gobeille
Chair, Green Mountain Care Board
89 Main Street, 3rd Floor, City Center
Montpelier, Vermont 05620

July 14, 2016

Dear Mr. Gobeille,

You have indicated in our discussions and in public forums that you are very interested in finding innovative leading edge solutions to make health care more affordable in Vermont. After meeting with Amy Cooper from Health First, we are excited about the possibility of our employees having a more affordable choice for outpatient procedures. We strongly support the Green Mountain Surgery Center and encourage the Green Mountain Care Board to approve their request. We are certain the ambulatory care center would be advantageous to Rhino Foods and our employees from a cost and potentially a scheduling perspective.

Over the last 10 years, Rhino has been very proactive in our Wellness initiatives and educating our employees to take personal responsibility not only for their personal health, but also responsible consumers of their health care costs. When consumer driven health plans came around, Rhino was quick to jump on board. We continue to offer a high deductible health plan with a Health Reimbursement Account (HRA). Rhino Foods now employs 130 people and is a manufacturing company with strong employee principles in Chittenden County. We have no plans to move outside the state, and in fact, have plans to be expanding our facility in the next 12 months. By declaring we have no intention to move, does not relieve your responsibility to approve proposals that will benefit companies that are committed to staying and thriving in Vermont. Rhino's third largest expense is Health Care benefits behind material cost and labor.

We support our local hospitals, but have heard from our employees about how long it takes to get appointments because the UVM Medical Center is so busy. The cost associated with outpatient procedures quickly depletes the employee's HRA funds so that they don't have funds available to use on other medical issues. I ask you to support other innovative and cost effective approaches to help employers and their employees in Vermont, such as this ambulatory surgical center. Please feel free to contact me to gain additional information or ask any questions. I would appreciate your attention to the approval process with a sense of urgency so that the Green Mountain Surgery Center can continue with their plans to help bring affordable and quality care options to Vermont.

Sincerely,

Ted Castle
President



750 PINE STREET
BURLINGTON, VERMONT 05401



July 14, 2016

Green Mountain Care Board
89 Main Street, Third Floor, City Center
Montpelier, Vermont, 05620

Dear Members of the Green Mountain Care Board:

I am writing on behalf of Lake Champlain Chocolates (LCC), to voice support for granting a Certificate of Need to the proposed Green Mountain Surgery Center. Now a second-generation family run company, LCC manufactures and sells specialty chocolates & confection products and gifts throughout the nation. We take tremendous pride in the local ingredients we use, the products we create and quality of life offered to employees here in the beautiful state of Vermont. Since 1983, our company has grown to employ over 150 individuals within the state of Vermont and I believe that the Green Mountain Surgery Center would generate significant savings for both our company and our employees by providing equal or more efficient and effective health care outcomes as compared to the current outpatient surgery options in the area.

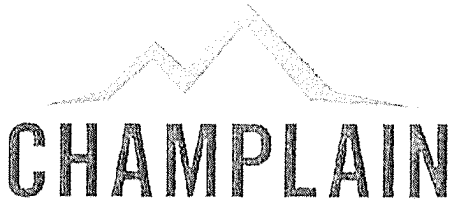
Through conversations with the applicant's team and some of our own research, I understand that the ambulatory surgery center would generate significant savings for Lake Champlain Chocolates and its employees. In addition, it will also provide quality, safe, convenient alternative to the hospital for basic procedures and outpatient care.

Our company has always been committed to providing a strong health care plan as an option to employees. This is a choice we make as a business knowing that costs may fluctuate. However, the past several years have seen the cost of health care increase at an unsustainable and concerning rate. It is imperative now to improve our health care system and get a control on costs. I believe the ambulatory surgery center is a step toward more sustainable health care costs, as it provides a high quality, low cost alternative.

We support our local hospital but feel it is time for choice when it comes to outpatient care. I support the proposal for the Green Mountain Surgery Center and look forward to hearing the outcome of this proposal.

Sincerely,

Eric Lampman
President



November 11, 2016

Mr. Alfred Gobeille, Chairman
Ms. Suzanne Barrett, Executive Director
Green Mountain Care Board
89 Main Street
Montpelier, Vermont 05020

Dear Mr Gobeille, Ms Barrett and Members of the Green Mountain Care Board

RE: Colchester outpatient surgical center application (Green Mountain Surgery Center)

Champlain Cable Corporation strongly supports the application of and certificate of need to build an ambulatory/outpatient surgical center proposed for Hercules Drive, Colchester. Based on our discussions with applicant's management team and on information we have received from the group Captive that our company belongs to, using their experience and research into the success of ambulatory care centers in other states, we are confident that a facility like this will generate significant savings for Champlain Cable and the approximately 125 employees who work in Colchester. This center will be able to provide equally or more efficient and effective health care outcomes as compared to the current outpatient surgery options in the local Burlington area. In addition, this center would provide greatly improved access and convenience to care for our employees as its location would be located down the street from our factory/HQ.

Champlain Cable Corporation has been a highly regarded, long standing manufacturer of wire & cable in Colchester Vermont for many years. With approximately 125 employees in this state and approximately 190 employees overall, we are one of the largest manufacturers in the state and have recently won several important business achievement awards. We run 24hrs a day, 5 days a week, at times 24/7.

As part of our benefit package to our hourly and salary employees in Vermont, we provide a premium health care plan. This is provided at minimal cost to the employee.

The majority of our health care activity happens in the Burlington and to some extent, St Albans area. We have a mature workforce, with many employees in their 40s and 50s and early 60s.

We have found that by making changes to how we manage risk, inform and incentivize people and help them make connections between their decisions and how it affects the overall cost to the group, we can understand what drives costs and formulate plans that when implemented, actually bring costs down. We see this outpatient surgical center, if approved, as being a significant positive step in this regard.

The proposal spells out where the cost of care, relative to the local hospital is between 30% and 45% less for the same procedure. Given the amount of money we spend for these services, particularly at Hospitals, the amount of money saved for Champlain Cable would be significant and would help make our health plan more sustainable.

Areas of concern to Champlain Cable that this outpatient surgery center touches on and helps to address:

- Vermont lacks independent orthopedic surgeons that are not affiliated with a hospital group. This limits competition/cost control and access/convenience for patients
- There are no active outpatient surgical centers for Vermont. We have been told these remain unused due to restrictions on use imposed by the Care Board.
- NH has over 20 such outpatient surgery centers; NY state has approximately 100. These non-hospital centers provide much needed competition and drive down cost. Portland ME has 4 such centers. Vermont has none of this capacity and is uncompetitive in this regard.
- Hospitals have been buying up high margin services and local practices to stifle competition and boost their bottom line. This center would help reverse that trend.
- Hercules Drive, Colchester outpatient surgery and testing center certificate of need application has been tied up in review for over 1 yr (original application/certificate of need filed July 2015). This appears to highlight an overly bureaucratic process and concerns us that some parties maybe unduly slowing the process of approval.
- This facility, which would be small (\$6 to \$8 million/yr revenue and about 2,000 to 2,500 patient visits/yr) is not a threat to UVM Medical. Their costs for essentially the same services provided by the hospital for limited scope outpatient surgery and testing are projected at 30 to 45% less than the Hospital. This facility would be a asset to our business as well as other numerous Colchester area businesses and a convenience to our employees, some of which work 2nd shift (3 - 11pm) or 3rd shift (11pm - 7am).

We also believe that the independent physicians proposing to open the GREEN MOUNTAIN SURGERY CENTER are part of a well-managed network, with the staff and expertise to support a project like this and bring it online successfully. Many of our employees, including senior management, have long-standing and very positive relationships with independent physicians from the HealthFirst provider network and therefore we are very supportive of their plans regarding this ambulatory care center.

The proposed facility also plans to accept various forms of payment and insurance (such as BCBS, CIGNA or another private party, Medicare and Medicaid) in order to serve a broad population.

For these reasons, we are fully backing the GREEN MOUNTAIN SURGERY CENTER's plans and we are requesting your support in embracing their proposal and expediting the approval process to the full extent possible.

We would be glad to offer our support for any initiatives in the above areas listed.

Sincerely,

Timothy A. Lizotte
VP/CFO
Champlain Cable Corporation
email: tlizotte@chamcable.com
ph (802) 654 4204

Jorge Quintana
HR Director
Champlain Cable Corporation
email: jquintana@chamcable.com
ph (802) 654 4209



Burlington, Vermont 05401

Mr. Al Gobeille
Chair, Green Mountain Care Board
89 Main Street, Third Floor, City Center
Montpelier, Vermont 05620

Dear Chairman Green Mountain Board,

I am writing this letter to state our support for granting a Certificate of Need to build an ambulatory care center in the greater Burlington area. We believe that a facility like this will generate significant financial savings locally for the community and equally provide more efficient and effective health care outcomes as compared to the current outpatient surgery options in the local Burlington area.

We believe that the independent physicians proposing to open the Green Mountain Surgery Center are part of a well-managed network, with the staff and expertise to support a project like this and bring it online successfully. Many of our people have long-standing and very positive relationships with independent physicians from the HealthFirst network, and therefore we are very supportive of their plans regarding this ambulatory care center.

Given Vermont's interest in lowering healthcare costs and retaining quality this is a solid approach. More over Its hard to understand why it's taken this long to get a solid proposal on the table. I am inclined to believe that Fletcher Allen's influence locally has created such a hostile environment that it simply keeps all other competition out under the guise of better for Vermonter's – this is not only false but detrimental to Vermont's best interests.

Please know that Seventh Generation is fully backing Green Mountain Surgery Center's plans and are looking for your support of the proposal and to the extent you can, expediting the approval process. I would be happy to discuss my company's position with you in more detail

Sincerely,

John LeBourveau

John LeBourveau

Vice President Human Resources

**AARP STATEMENT &
SELECTION OF COMMENTS
FROM THE PUBLIC**



199 Main Street, Suite 225 | Burlington, VT 05401
1-866-227-7451 | Fax: 802-651-9805 | TTY: 1-877-434-7598
aarp.org/vt | vt@aarp.org | twitter: @aarpvt
facebook.com/AARPVermont

June 9, 2015

Mr. Alfred Gobeille
Chair, Green Mountain Care Board
89 Main Street, Third Floor, City Center
Montpelier, Vermont 05620

Dear Mr. Gobeille,

I write on behalf AARP-VT, an organization dedicated to enhancing quality of life for all as we age. Representing approximately 140,000 Vermonters we work for positive social change and to deliver value to our members through information, advocacy and service.

I am writing to support the effort to build an outpatient ambulatory surgery center in Chittenden County. For our members, having a lower cost, high quality outpatient surgery option is something which makes sense and should be available.

AARP believes that health care spending should be more rational and support the goals of more efficient planning, budgeting, and resource coordination. We believe that cost containment should be an explicit consideration in decisions relating to the distribution and allocation of health care resources, capital, technology, and personnel, whereby innovation, efficiency, cost effectiveness and reasonable access to services are all encouraged.

Outpatient surgery has become an increasingly important part of medical care in the United States in the past 30 years, with the number of outpatient procedures rising dramatically since 1981. In 2011, more than 60 percent of all U.S. surgeries were outpatient procedures compared to 19 percent in 1981. This is due in part because they're more convenient for patients than hospitals, getting them back home more quickly as well as being less costly. According to a [2014 study published in *Health Affairs*](#), ambulatory surgery centers (ASCs) offer a lower-cost alternative to hospitals as venues for outpatient surgeries. By analyzing survey data from the CDC, the study found that, on average, procedures performed in ASCs took about 25 percent less time than the same procedures performed at a hospital and with equal levels of patient satisfaction. The study's findings suggest that ASCs provide an efficient way to meet future growth in demand for outpatient surgeries and can help fulfill the Affordable Care Act's goals of reducing costs while improving the quality of health care delivery.

In my opinion AARP-VT members, and in fact all Vermonters, will be well served by having a non-hospital based surgical option in our state.

Sincerely,

Greg Marchildon
Executive Director, AARP-VT

Smith, Beverly

From: GMCB.Board@vermont.gov on behalf of Green Mountain Care Board
<GMCB.Board@vermont.gov>
Sent: Wednesday, April 05, 2017 2:49 PM
To: GMCB - Board
Subject: Form submission from: Public Comment

Follow Up Flag: Follow up
Flag Status: Completed

Submitted on Wednesday, April 5, 2017 - 2:49pm Submitted by anonymous user: [172.30.78.110] Submitted values are:

Name: Gerry Silverstein
Affiliation, if applicable:
Address:
Email Address: gsilverst@gmail.com
Topic: Certificate of Need
Comment:

I am writing to support a Certificate of Need for the proposed independent surgical center. Monopoly healthcare facilities, such as the UVM Medical Center, have little incentive to hold down costs. Today's VT Digger reported that the UVM Medical Center took in \$25.8 million dollars more than they had stated they would derive from patient care in the past fiscal year, and this over-billing has happened before.

In the April 4, 2017 issue of JAMA, an article entitled "Making Healthcare Work—Competition Policy for Health Care" the authors make the following statement: "many studies have examined trends toward increasing consolidation of physician practices and hospitals in the US health care system and the negative effects of decreased competition on the quality of patient care and health care costs." The authors go on to state: "Despite general consensus among economists and health policy experts that competition enhances patient choice, improves quality, and reduces cost, few actionable policy recommendations have been offered beyond greater antitrust enforcement by the Federal Trade Commission.

My own experience will help provide clarity to the need for independent medical facilities. In 2015, I had a problem with my hand. Since my primary care physician is with the UVM Medical Center, I sought an appointment through their orthopedic department. The earliest appointment required a six-week wait. Not wanting to wait six weeks I made an appointment with an independent orthopedic group, which I was able to see within two weeks.

I saw an orthopedic hand surgeon (MD). That practice billed my Blue Cross Blue Shield insurance \$126, and BCBS paid \$63.51.

Wanting a second opinion, I kept my appointment with the UVM Medical Center. My appointment was with a physician assistant who billed BCBS \$292, of which BCBS paid \$228.83.

The UVM Medical Center charge was more than double that of an independent group for me to see a PA vs. an MD surgeon, and the reimbursement rate paid by BCBS to the UVM Medical Center was more than triple the rate paid to the independent orthopedic facility.

What response would the GMCB offer to the public when the public is told that the orthopedic group mentioned above has recently been bought by the UVM Medical Center?

Without competition (and numerous other interventions to control healthcare costs), the unsustainable trajectory of out-of-control spending on healthcare will continue until the evil word "rationing" becomes commonplace.

Please issue a Certificate of Need for the new independent surgical center.

The results of this submission may be viewed at:

<http://gmcbboard.vermont.gov/node/277/submission/878>

John J. McDonald
307 Brigham Hill Road
Essex Junction, VT 05452-2003
Phone (802) 872-8656
Saturday, April 8, 2017

Green Mountain Care Board
89 Main Street
Montpelier, VT 05620-3601

Dear Board Members,

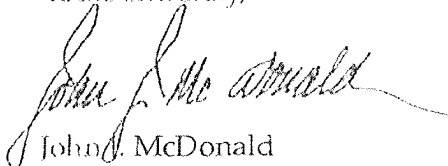
I would like to add my voice and that of my wife to those Vermonters expressing skepticism (at the very least) about what appears to be a long-running attempt by the UVM Medical Center and its affiliated hospitals and physicians' practices to monopolize health care in our state.

In the quarter century that we have lived in Vermont, we have had occasion to seek medical care for three serious situations and two minor matters that involved hospitalizations. In the two most serious cases, the preliminary arrangements by what was then "Fletcher Allen" involved so many delays as well as unpleasant interactions that once we ended up in Boston and once in Pennsylvania. These alternatives were not chosen because UVM lacked the right specialists, but because we could not effectively access these specialists in situations that involved some risk if care were delayed. The moves afforded us a good view of how medical care can and should be organized.

UVM's claim that Vermont does not need further capacity — or competition — in (for example) gastroenterology ring completely hollow for us. Many of our interactions over the years have led to a conviction that UVM NEEDS competition in the worst possible way, in order to improve the care it provides within reasonable time limits and at reasonable prices.

One specific step would be to allow the surgical clinic that is attempting to open in the Burlington area to do so. The account of safety concerns raised by UVM rings hollow in light of the nationwide safe operation of such clinics. Another step: Thoroughly investigate UVM to make sure that qualified doctors are not being denied hospital privileges. Although I don't claim to know the ins and outs of such decisions, I do have first hand knowledge of doctors' practices that have been excluded, which sounds like a move to monopolize not only hospital care in Vermont, but also family physician care.

Yours sincerely,


John J. McDonald

Smith, Beverly

From: GMCB.Board@vermont.gov on behalf of Green Mountain Care Board
<GMCB.Board@vermont.gov>
Sent: Friday, April 14, 2017 4:52 PM
To: GMCB - Board
Subject: Form submission from: Public Comment
Categories: Purple Category

Submitted on Friday, April 14, 2017 - 4:51pm Submitted by anonymous user: [172.30.78.110] Submitted values are:

Name: Jake Mathon

Affiliation, if applicable:

Address: 435 Talcott Road

Email Address: uvmalum93@yahoo.com

Topic: Certificate of Need

Comment: I am in favor of the Certificate of Need for the proposed Green Mountain Surgical Center. Our non-profit hospital system will not be harmed as they already have a distinct advantage with tax-exempt status and near monopoly to charge prices as high as they can. Competition will not degrade quality of care, but rather enhance it as the GMSC will need to perform exceptionally well to stay in business. We have less choice today in our health care than even a few years ago and we should be doing anything we can that might improve patient care and lower costs.

The results of this submission may be viewed at:

<http://gmcboard.vermont.gov/node/277/submission/992>

Smith, Beverly

From: GMCB.Board@vermont.gov on behalf of Green Mountain Care Board
<GMCB.Board@vermont.gov>
Sent: Friday, April 14, 2017 11:18 AM
To: GMCB - Board
Subject: Form submission from: Public Comment

Categories: Purple Category

Submitted on Friday, April 14, 2017 - 11:17am Submitted by anonymous user: [172.30.78.110] Submitted values are:

Name: Melinda Moulton
Affiliation, if applicable: Main Street Landing
Address: One Main Street
Email Address: melinda@mainstreetlanding.com

Topic: ACOs

Comment:

Good afternoon, my name is Melinda Moulton and I am the CEO of Main Street Landing. I am here today to express my support for the Green Mountain Surgery Center. I have been involved in watching this vision develop over the past few years. I am so excited to have the Green Mountain Surgery Center in the Burlington Area because I will use it.

This is not a referendum on the UVM Medical Center – this is a practical and wise and much needed addition to the fabulous health care Vermonters already receive in their communities.

When I had my cataract surgery I chose the UVM Medical Center for that care.

I received amazing care – but the experience was overbearing – it took long periods of time to get an appointment and when I arrived to my appointments I had to wait sometimes hours to be seen. I switched over to the Vermont Vision Center for my eye care. The availability for

appointments and time spent was noticeable different. I have a friend who tore his Achilles heel – it took him weeks to be seen at the Hospital. I have another friend who had to wait months for the removal of his cancerous prostate with appointments being changed or put off.

Look – We need More Accessibility to quality health care – not less. Our Health Care should not be centered within one organization.

The surgeons who want to own and operate the Green Mountain Surgery Center will deliver an affordable, professional and high level of service to our community that supports and complements the services at the UVM Medical Center.

This Surgical center will not have the extraordinary overhead of the Hospital – it does not have to pay a development staff and administrators or high overhead for facility operations and expansion. The Green Mountain Surgery Center operations are directed and overseen by their professional surgeons. My guess would be that we will receive extraordinary service – at an affordable price – quickly and efficiently. How can this be anything but a Good Thing for the people of Vermont? Monopolies are not good for people – more choices for the people of Vermont in where they go for their health care is a Good Thing – This is why I am here today to encourage you to support the Green Mountain Surgery Center and the surgeons who so passionately - and compassionately - wish to operate in order to serve our Vermont citizenry.

Thank you,

Melinda Moulton, CEO Main Street Landing Resident of Huntington, Vermont

The results of this submission may be viewed at:

<http://gmcboard.vermont.gov/node/277/submission/984>

Smith, Beverly

From: GMCB.Board@vermont.gov on behalf of Green Mountain Care Board
<GMCB.Board@vermont.gov>
Sent: Friday, April 14, 2017 12:22 PM
To: GMCB - Board
Subject: Form submission from: Public Comment

Categories: Purple Category

Submitted on Friday, April 14, 2017 - 12:21pm Submitted by anonymous user: [172.30.78.110] Submitted values are:

Name: Andrew

Affiliation, if applicable:

Address:

Email Address: tyrvold@yahoo.com

Topic: Other

Comment:

I would like to comment on the proposed for profit surgical center. It has been my experience much to the contrary of others that have testified in front of the board that the operating rooms and procedure rooms are being over utilized, with surgeries and some minor procedures being booked months out from their initial diagnosis. I believe that for to long the hospital network in this state has put a strangle hold on improving Vermont healthcare. By doing exactly what they are here, stamping out any competition and making their game the only one in town. My experience here has been one of "if you don't like how we operate, to bad we are the only ones around." By having a healthy competitor in town it can drive innovation and better service for all patients at the hospital.

Thank you for your time.

The results of this submission may be viewed at:

<http://gmcboard.vermont.gov/node/277/submission/988>

Smith, Beverly

From: GMCB.Board@vermont.gov on behalf of Green Mountain Care Board
<GMCB.Board@vermont.gov>
Sent: Monday, April 17, 2017 6:05 PM
To: GMCB - Board
Subject: Form submission from: Public Comment

Submitted on Monday, April 17, 2017 - 6:04pm Submitted by anonymous user: [172.30.78.110] Submitted values are:

Name: Liam Murphy
Affiliation, if applicable:
Address: 170 Wexford Lane
Email Address: liam15inc@hotmail.com
Topic: Certificate of Need
Comment:

Ambulatory Surgery Center.

As a member of the public and an employer who is a consumer of health care services, I believe the Board should approve the currently proposed AMC and many others throughout Vermont. I believe that the type of services which could be provided and the competition will be beneficial to our health care system and will help reduce health care costs.

I watched some of the hearings and read the newspaper coverage and was quite disappointed by the apparent bias of the board in favor of the existing hospitals. The applicant for the certificate should have been given at least as much time to present its witnesses and testimony as the opponents to the application.

Please look out for the consumers for a change and approve this application.

The results of this submission may be viewed at:
<http://gmcboard.vermont.gov/node/277/submission/1020>

Smith, Beverly

From: GMCB.Board@vermont.gov on behalf of Green Mountain Care Board
<GMCB.Board@vermont.gov>
Sent: Tuesday, April 18, 2017 9:43 AM
To: GMCB - Board
Subject: Form submission from: Public Comment

Submitted on Tuesday, April 18, 2017 - 9:42am Submitted by anonymous user: [172.30.78.110] Submitted values are:

Name: Janet H Fitzpatrick
Affiliation, if applicable:
Address: 20 cascade St Essex Junction VT 05452 Email Address: pafjhf@yahoo.com
Topic: Certificate of Need
Comment: Please issue a Certificate of Need for the Green Mountain Surgery Center. The University of Vermont Medical Center is essentially a health care monopoly in Chittenden County. The Green Mountain Surgery Center would offer patients health care choice, which is sorely lacking in Chittenden County. Procedures at the Green Mountain Surgery Center would be cheaper, the location would be convenient for the vast majority of patients who drive and parking would be free! The University of Vermont Medical Center location in Burlington is inconvenient for anyone who can't take public transportation. Paying for parking is just adding insult to injury! Please save money for the residents of Vermont and grant the Certificate of Need to the Green Mountain Surgery Center.

The results of this submission may be viewed at:
<http://gmcboard.vermont.gov/node/277/submission/1024>

Smith, Beverly

From: GMCB.Board@vermont.gov on behalf of Green Mountain Care Board
<GMCB.Board@vermont.gov>
Sent: Tuesday, April 18, 2017 10:06 AM
To: GMCB - Board
Subject: Form submission from: Public Comment

Follow Up Flag: Follow up
Flag Status: Completed

Submitted on Tuesday, April 18, 2017 - 10:06am Submitted by anonymous user: [172.30.78.110] Submitted values are:

Name: Jane Evans
Affiliation, if applicable: UVM Patient
Address: Burlington, Vermont
Email Address: hi@hotboxhoney.com
Topic: Other
Comment:

I spoke briefly at the first hearing in support of the Green Mountain Surgery Center because I believe that Vermonters need faster care and more choice, in addition to lower costs and higher quality of care. I have been a patient at several UVM facilities since moving to Vermont in 2009, simple because there aren't many other options other than Naturopaths, which don't accept my insurance (Medicare). So, I began at Given in Essex and am now at Given in Burlington, along with my husband. I feel as if I am qualified to speak in favor of the Green Mountain Surgery Center from personal experience with the UVM healthcare system, which stated in last weeks hearing that there is no need and that they already have an efficient system. I truly beg to differ, because the facts state otherwise:

WAIT TIMES

1. Last summer, I hurt my back. I was hoping to get some simple steroid injections or such which has worked in the past, but the soonest the UVM Spine Clinic was able to schedule me for a first appointment was four months later, in mid November. By the time of the appointment, my back issues had thankfully resolved and I no longer needed the treatment, but it would have helped greatly through the months I suffered.
2. I am currently having to wait one month for a simple knee injection because the UVM orthopedic center on Tilley drive cannot meet the demands of their patient load.
3. My husband Greg tore his ACL last Spring in a ski accident. Because there was an incredibly long waiting list to see a doctor at the UVM orthopedic center, we decided to seek an independent orthopedic physician who could get him in sooner. We found Dr. Kaplan at Associates in Orthopedics who was able to see him within a few weeks. The other reasons we chose Dr. Kaplan's office is because Greg doesn't really like going to hospitals because he doesn't like to be exposed to a lot of really sick people and because it is really hard to park at the UVM Medical Center -- the garage is nearly always full. I believe the GMSC would be a more positive experience for the patient and likely a much easier parking situation.

BEFORE AND AFTER - Decrease in Quality of Care

Shortly after we begun with Dr. Kaplan, UVM purchased his practice, so there are no longer any independent orthopedic physician practices in Vermont that are not affiliated with UVM. The experience of care after the purchase by UVM is what I would like to speak about now, because the change was rather dramatic:

- a. After the purchase by UVM, we were no longer able to call and get an appointment using the telephone for at least one month – when Greg needed an appointment, he had to drive all the way to South Burlington from his office in Shelburne on a lunch break to make an appointment, and then sometimes the computer system did not store the appointment.
- b. One day Greg was at the office the same time a UVM admin team was there and it was clear to Greg that the staff was much more concerned with helping the admin team instead of helping him – he felt as though his care was rushed and unimportant.
- c. I was with him one day when Dr. Kaplan had to try to explain to Greg the results of his MRI without the actual MRI because the medical record was not working.

COST

My husband and I both have good jobs, but the cost of Greg's surgery included a large facility fee along of over ten thousand dollars, which was just one small part of the total cost of his injury, surgery and rehab. We has to take a loan out to pay this bill, which luckily UVM discounted slightly.

LACK OF DOCTORS IN VERMONT

The biggest problem for our family in Vermont is the lack of primary care doctors. Perhaps a nice new facility like the GMSC would attract more physicians to come to Vermont who don't want to work at hospitals, but instead set up private practices and could use the GMSC as needed for standard outpatient procedures. Right now, we are forced to use Given Primary Care at UVM, which gives us a different student doctor every time we go, so we have to explain our entire medical history over to someone new each time (talk about inefficient!). We would greatly prefer to have a family doctor who knew us in a place separate from UVM, but there doesn't seem to be any other choices in Burlington, where we live and share a single car.

GMSC IS GOOD FOR VERMONT

I don't see the building of the GMSC as competition to UVM or NMC . . . I see it as opportunity for the doctors to have decreased ICU wait times for patients in need because the rooms currently being used for outpatient surgeries that could be safely performed at GMSC could then be repurposed for more ICU capacity at the hospitals. I loved the testimony of the emergency room doctor during the hearing who stated that he was working and there was no place to send his patients who needed ICU.

As a business owner myself, I see competition as an opportunity to improve and grow, not to complain about or try to prevent. Change is usually a good thing if we respond to it in a positive manner. I have never lived anywhere with less health care choices than Vermont, but I would like to stay here. The lack of progress, however, may drive young people away from Vermont in the same way we are leaving in droves to find more job opportunities. Let's build taller buildings downtown, expand our roads and approve the GMSC and other development projects as a whole and create more jobs here, so our dwindling population can continue to live and work in this beautiful state with

access to higher quality, more affordable care both at the hospitals and the Green Mountain Surgery Center. Let's work together to create a better Vermont!

The results of this submission may be viewed at:
<http://gmcbboard.vermont.gov/node/277/submission/1025>

Smith, Beverly

From: GMCB.Board@vermont.gov on behalf of Green Mountain Care Board
<GMCB.Board@vermont.gov>
Sent: Tuesday, April 18, 2017 1:46 PM
To: GMCB - Board
Subject: Form submission from: Public Comment

Submitted on Tuesday, April 18, 2017 - 1:46pm Submitted by anonymous user: [172.30.78.110] Submitted values are:

Name: Joe Haddock, M. D.
Affiliation, if applicable: Thomas Chittenden Health Center
Address: 586 Oak Hill Road, Williston, Vt. 05495 Email Address: joe.haddock@tchconline.com
Topic: Other
Comment:
Members of the Green Mountain Care Board:

This letter is in support of the proposed Ambulatory Surgical Center. After listening to the session last week, I don't envy you your responsibilities.

Admittedly not a native Vermonter, I came here as an intern at the Medical Center Hospital of Vermont in 1972. I then spent 3 years in North Carolina in the military, 2 years as a medical resident at MCHV, and have been practicing Family Medicine at the Thomas Chittenden Health Center in Williston since 1978.

This letter should not be considered as "anti UVMC". Most physicians in this area did some or all of their training at the Medical School or the hospital – and practice here in part because of that. In fact I spoke in favor of the Ambulatory Care Center and Davis Auditorium before BISHCA some 20 years ago. We all need for our hospital to continue to provide high quality care, remain stable financially, and be receptive to community needs.

The proposed ASC would add a significant component to our medical community by providing equally high quality, more easily accessible, and more easily affordable procedures – the last especially important in this era of high deductible insurance plans.

In the areas of Family Medicine, Pediatrics, and Obstetrics/Gynecology, there exists a collegial balance between private and hospital-owned practices, offering different styles of practice from which patients may choose. The ASC would help extend that balance to some of the specialty practices as well. If we are to continue to have independent practices in Vermont, as I think we should, this would be an important step, while at the same time offering patients a lower cost, high quality alternative.

Having spent 6 years on the FAHC Board of Trustees and hearing the financial report offered at the last annual UVMC medical staff meeting, it is my opinion that the hospital would not be materially affected financially by the ASC – much the same as it wasn't with the arrival of the South Burlington Eye Center a few years ago.

Thank you for the opportunity to comment.

Joe Haddock, M.D.

The results of this submission may be viewed at:
<http://gmcboard.vermont.gov/node/277/submission/1034>

Smith, Beverly

From: GMCB.Board@vermont.gov on behalf of Green Mountain Care Board
<GMCB.Board@vermont.gov>
Sent: Tuesday, April 18, 2017 6:21 PM
To: GMCB - Board
Subject: Form submission from: Public Comment

Follow Up Flag: Follow up
Flag Status: Completed

Submitted on Tuesday, April 18, 2017 - 6:20pm Submitted by anonymous user: [172.30.78.110] Submitted values are:

Name: Arthur Bell

Affiliation, if applicable:

Address: 57 N. union st Burlington vt

Email Address: Thedrivein@mac.com

Topic: Certificate of Need

Comment: I don't know all the ins and out of how budgets and health care work but this seems to me to be the first viable idea that's come along in a long time that has a shot at actually lowering our health care costs. Equally importantly are radically lowering wait times for simple out patient care. I needed some work done, my community health center referred me to Fletcher Allen - this was this past March. I have an appointment for this coming DECEMBER. Thank you. This is important to many many Vermonters.

The results of this submission may be viewed at:

<http://gmcboard.vermont.gov/node/277/submission/1036>

Smith, Beverly

From: GMCB.Board@vermont.gov on behalf of Green Mountain Care Board
<GMCB.Board@vermont.gov>
Sent: Wednesday, April 19, 2017 10:33 AM
To: GMCB - Board
Subject: Form submission from: Public Comment

Submitted on Wednesday, April 19, 2017 - 10:33am Submitted by anonymous user: [172.30.78.110] Submitted values are:

Name: Christopher Motter

Affiliation, if applicable:

Address: 212 Dunmore Lane

Email Address: cmotter@hotmail.com

Topic: Other

Comment: It's about time that we have some free market economy changes in Vermont. Though UVM brings solid service and medical care to the State, we need to have private options as well. Competition is good overall with regards to keeping pricing low and the quality of care up.

The results of this submission may be viewed at:

<http://gmcboard.vermont.gov/node/277/submission/1043>

Smith, Beverly

From: GMCB.Board@vermont.gov on behalf of Green Mountain Care Board
<GMCB.Board@vermont.gov>
Sent: Wednesday, April 19, 2017 9:39 PM
To: GMCB - Board
Subject: Form submission from: Public Comment

Submitted on Wednesday, April 19, 2017 - 9:38pm Submitted by anonymous user: [172.30.78.110] Submitted values are:

Name: Janko Velov
Affiliation, if applicable:
Address:
Email Address: Vj.1984@yahoo.com
Topic: Certificate of Need
Comment:

I am writing this comment in support of Green Mountain Surgery Center (GMSC).
I am 32years old blood donor, father of 2 years old baby girl, hard worker who has bad health coverage. I truly believe that Green Mountain Surgery Center will make my life and lives of many Vermonters with bad or no health coverage much easier, by providing hospital services at competitive price. If anyone out there think for a second about people who makes less then \$30k / year and can't afford expencive surgeries , will understand how hard is being poor and how good will be having something like GMSC arround. Please help us make Vermont better place to live for everyone!
Good Bless
)

The results of this submission may be viewed at:
<http://gmcboard.vermont.gov/node/277/submission/1048>

From: [GMCB - Board](mailto:GMCB-Board@vermont.gov)
To: [Yvonne Lacaillade](mailto:Yvonne.Lacaillade@vermont.gov)
Subject: FW: Form submission from: Public Comment
Date: Thursday, March 23, 2017 9:19:11 AM

-----Original Message-----

From: GMCB.Board@vermont.gov [<mailto:GMCB.Board@vermont.gov>]
Sent: Wednesday, March 22, 2017 3:29 PM
To: GMCB - Board <GMCB.Board@vermont.gov>
Subject: Form submission from: Public Comment

Submitted on Wednesday, March 22, 2017 - 3:28pm Submitted by anonymous user: [172.30.78.110] Submitted values are:

Name: Yvonne Lacaillade

Affiliation, if applicable:

Address: 48 Greenbriar Lane, Colchester, VT 05446 Email Address: Ylacaillade@yahoo.com

Topic: Certificate of Need

Comment: Surgical Center: I believe a new surgical center is a must for patients in need. Not only will it reduce wait times dramatically but will lower costs to insurances and patients. A monopoly is never a good idea. My PCP is a UVM doctor. I just found out when trying to make an appointment with uvm dermatology for suspicious growths that I could not be seen until NOVEMBER unless my doctor does an "urgent" referral. I can't see her until May 12th. Today is 3/22/17. Unacceptable! Approve the surgical center so others do not have to wait for what the center will provide. It doesn't help me at this point and for my problem but hopefully it will be a big asset to other patients.

The results of this submission may be viewed at:

<http://gmcboard.vermont.gov/node/227/submission/773>

Smith, Beverly

From: GMCB.Board@vermont.gov on behalf of Green Mountain Care Board
<GMCB.Board@vermont.gov>
Sent: Thursday, April 20, 2017 12:02 AM
To: GMCB - Board
Subject: Form submission from: Public Comment

Submitted on Thursday, April 20, 2017 - 12:02am Submitted by anonymous user: [172.30.78.110] Submitted values are:

Name: Scott Benjamin, MD
Affiliation, if applicable: Benjamin Physical Medicine, PLC
Address: 373 Blair Park Rd. Ste 206
Email Address: DrB@BenjaminPhysicalMedicine.com
Topic: Certificate of Need

Comment: As a 14 year provider in the area and a new private practitioner after 14 years at UVM, I strongly support the opening of a free standing outpatient surgical center. Patients are losing choice in the state and are losing the community care that UVM is no longer able to provide because of it's massive size, waste and bureaucracy. As a physician now leaving the UVM medical group, I can tell you that my patients feel that they get lost in the system and look forward to joining me in a private office. I would be one of the practitioners that would wish to use a new outpatient surgery center to provide care for my pediatric and adult special needs patients.

The results of this submission may be viewed at:
<http://gmcboard.vermont.gov/node/277/submission/1049>

Smith, Beverly

From: GMCB.Board@vermont.gov on behalf of Green Mountain Care Board
<GMCB.Board@vermont.gov>
Sent: Thursday, April 20, 2017 10:24 AM
To: GMCB - Board
Subject: Form submission from: Public Comment

Submitted on Thursday, April 20, 2017 - 10:24am Submitted by anonymous user: [172.30.78.110] Submitted values are:

Name: Martha Cady
Affiliation, if applicable: None
Address: Pearl Street Essex Jct.
Email Address: mecady@uvm.edu
Topic: Other

Comment:

Thank you Amy Cooper for speaking in the best interest of the patient!

Why not let the public vote on having a Surgical Center! Send a survey & see what the public thinks.

If the hospital is really all about the "patient" they would admit we need more Medical Center's in the area to take "care" of the "patient".

As a "patient" I know that surgeries and colonoscopies ARE booked out in advance. If the hospital has plenty of capacity why are they booked so far out in advance?

The monopoly and control has gone on way too long to be in the best interest of the "patient".

The results of this submission may be viewed at:

<http://gmcboard.vermont.gov/node/277/submission/1051>

Smith, Beverly

From: GMCB.Board@vermont.gov on behalf of Green Mountain Care Board
<GMCB.Board@vermont.gov>
Sent: Thursday, April 20, 2017 5:40 PM
To: GMCB - Board
Subject: Form submission from: Public Comment

Follow Up Flag: Follow up
Flag Status: Flagged

Submitted on Thursday, April 20, 2017 - 5:40pm Submitted by anonymous user: [172.30.78.110] Submitted values are:

Name: Meg McGovern
Affiliation, if applicable:
Address:
Email Address:

Topic: Certificate of Need

Comment: Affordable healthcare can only happen with more competition for services. ASC are in every state, why not VT? Why let UVM Medical center continue to make Million \$ profits, which then must be donated to charity? Let's try to be open minded and welcome new business owners looking to bring jobs and opportunity to our state. We NEED projects and new ideas. How can a small group of seemingly politicized people be in charge of this decision? Listen to the people.

The results of this submission may be viewed at:
<http://gmcboard.vermont.gov/node/277/submission/1056>

Smith, Beverly

From: GMCB.Board@vermont.gov on behalf of Green Mountain Care Board
<GMCB.Board@vermont.gov>
Sent: Friday, April 21, 2017 6:18 PM
To: GMCB - Board
Subject: Form submission from: Public Comment

Submitted on Friday, April 21, 2017 - 6:18pm Submitted by anonymous user: [172.30.78.110] Submitted values are:

Name: Stephen Donahue
Affiliation, if applicable:
Address: 316 South Willard Street
Email Address: steve@donahueassociatesvt.com
Topic: Certificate of Need

Comment: I would hope that after many thoughtful questions and responses, and a clear long line of support from the community, that the Green Mountain Care Board does what it has been appointed to do and allow a health care provider an opportunity to join the local community of care giving and add a cost effective care service and facility. The lengthy analysis of this small surgery center leaves concern that the Green Mountain Care Board is able to play a role and move the needle on health care reform and betterment. I think it is time to do your job and approve this independent surgery center for its CON. The time for debating is over!

The results of this submission may be viewed at:
<http://gmcboard.vermont.gov/node/277/submission/1062>

Smith, Beverly

From: GMCB.Board@vermont.gov on behalf of Green Mountain Care Board
<GMCB.Board@vermont.gov>
Sent: Saturday, April 22, 2017 2:38 PM
To: GMCB - Board
Subject: Form submission from: Public Comment

Submitted on Saturday, April 22, 2017 - 2:37pm Submitted by anonymous user: [172.30.78.110] Submitted values are:

Name: Clara J. Bond
Affiliation, if applicable:
Address: 12 East Village Drive
Email Address: bondcarlough@gmail.com
Topic: Other
Comment:

My husband and I have, over the years, been well cared for in the old Fletcher Allen UVM hospital. I suspect that care will continue and perhaps become even better if we consumers finally get a choice in where to receive our care. For heaven's sake, please approve this new surgical proposal. Free market, competition has it all over the closed system you've been supporting. A breath of fresh air might invigorate and reduce costs in our health care community

The results of this submission may be viewed at:
<http://gmcboard.vermont.gov/node/277/submission/1065>

I would like to thank the Green Mountain Care Board for the opportunity to speak in support of the Green Mountain Surgery Center. My name is Rick Dooley, and I have been a Family Practice Physician Assistant at Thomas Chittenden Health Center in Williston for the past 18 years. I have watched over the years as UVMHC has expanded its footprint, and have seen many signs replaced with the UVMHC logo. I routinely hear from my patients that they would prefer to go to a non-UVMHC provider, typically because of the excessively high costs of the hospital-affiliated services.

From a personal perspective, I had the good fortune (or misfortune) to require a colonoscopy last year. Despite working in the health care field, I, like many Vermonters, have a high-deductible health insurance plan. I chose to go to an independent gastroenterologist, but the procedure had to be performed at UVMHC because there is currently no alternative. The professional fee for the physician who did the scope was \$650. The fee paid to UVMHC for the 30" procedure was \$3184, bringing my total cost to almost \$4000. If I had wanted to drive a couple hours to the Salem Surgery Center in NH (probably not a good idea while prepping for a colonoscopy), the total cost for my procedure and physician fee would have been \$2136. I paid almost double what I could have because of the lack of an alternative facility in Vermont. If UVMHC has the open space that they suggest, rather than filling it with procedures that are more appropriate for an outpatient surgery center, perhaps they should look at repurposing those rooms for additional ICU capacity, as suggested last week at this hearing, or increasing their inpatient mental health capacity, which is also in dire need.

If the board is truly interested in working for Vermonters and lowering the cost of health care in Vermont, rather than supporting a high-cost hospital-centric model, they should grant the CON for the Green Mountain Surgery Center. Vermonters want and deserve choice and competition. I would also encourage the board to look at the cost transparency tool that New Hampshire has built, which can be found at <http://nhhealthcost.nh.gov/>, as perhaps a model for this state to truly help patients make affordable health care choices. Thank you.

Rick Dooley, PA-C

Thomas Chittenden Health Center

Smith, Beverly

From: GMCB.Board@vermont.gov on behalf of Green Mountain Care Board
<GMCB.Board@vermont.gov>
Sent: Monday, April 24, 2017 10:09 PM
To: GMCB - Board
Subject: Form submission from: Public Comment

Submitted on Monday, April 24, 2017 - 10:08pm Submitted by anonymous user: [172.30.78.110] Submitted values are:

Name: tamara mclaughlin
Affiliation, if applicable: resident
Address: 130 pheasant woods colchester vt 05446 Email Address: tamara@vtsafetynet.com
Topic: Other
Comment:
proposed surgery center colchester

As a resident of Colchester, I am writing in support of the proposed surgical center in Colchester . I welcome additional choice and shorter access times for care. I can see no good reason why it should not be supported by all.

The results of this submission may be viewed at:
<http://gmcboard.vermont.gov/node/277/submission/1082>

OFFICE OF THE HEALTH CARE ADVOCATE

VERMONT LEGAL AID, INC.

OFFICE OF THE HEALTH CARE ADVOCATE

264 NORTH WINOOSKI AVE.
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May 2, 2017

Green Mountain Care Board
3rd Floor City Center
89 Main Street
Montpelier, VT 05620

Re: HCA Comments on CON GMCB-010-15con Green Mountain Surgery Center

Dear Members of the Green Mountain Care Board,

The Office of the Health Care Advocate (HCA) has chosen to participate in the above-captioned Certificate of Need (CON) proceedings as an interested party because of the project's potential impact on Vermonters. We ask the Green Mountain Care Board (the Board) to approve ACTD LLC's CON for establishment of the Green Mountain Surgery Center (GMSC) and to impose a set of conditions to ensure that the GMSC is accountable to patients and to Vermont's health care system. We believe that this facility, with the conditions we suggest, will be beneficial to consumers and therefore to the health care system as a whole.

In its application and related materials, ACTD has stated that the GMSC will give patients and doctors an affordable, efficient, high quality option for a limited set of medical procedures. ACTD has stated that Vermonters will have access to the facility regardless of their insurance status and that the GMSC will implement a financial assistance policy that adheres to federal requirements for nonprofit hospitals. We appreciate these assurances from ACTD and ask the Board to ensure that they are realized.

The other intervening parties in this matter, the Vermont Association of Hospitals and Health Systems and Northwestern Medical Center, expressed concerns about the potential effects of the GMSC on hospitals' revenue. We do not believe that the possible negative impact on hospitals' revenue in this case negates the need for improvement and innovation in other parts of our health care system. We are confident that the hospitals have the ability and financial flexibility to adapt to changes in the system including this relatively small project. We believe that the other concerns raised by the two parties were not supported by evidence, were addressed sufficiently by the applicant, and/or are addressed by the conditions we suggest.

We appreciate the applicant's stated commitment to increasing access, affordability, efficiency, and price transparency; maintaining or improving quality of care; providing appropriate,

The Office of the Health Care Advocate, previously named the Office of Health Care Ombudsman, is a special project of Vermont Legal Aid.

evidence-based services; and being an active, collaborative member of Vermont's health care system. We further recognize the value in supporting a provider-friendly work environment to the extent that it will improve provider recruitment and retention in Vermont. To ensure that these goals are met we ask the Board to approve the GMSC CON and to apply the conditions outlined below.

1. Payer Mix and Utilization

- a. The GMSC must serve all Vermonters without regard to any individual's payer type, insurance status, or ability to pay for necessary services. The GMSC must serve Medicaid and Medicare beneficiaries, and un- and under-insured Vermonters, without applying a quota to the number of patients in any category.
- b. The GMSC must demonstrate that it serves, at a minimum, a reasonably proportionate number of Medicaid patients to the number of Medicaid patients served by the local hospitals, except to the extent that the Medicaid patients choose to receive care at local hospitals over the surgery center or it is necessary based on acuity.
- c. The GMSC must provide appropriate services and must ensure that its rates of utilization are in line with patient needs.

Reporting

- ACTD must submit, quarterly in the first year and annually thereafter (or more often at the Board's request), a report to the Board outlining the GMSC's payer mix by provider and procedure, comparative information for local hospitals, and to the extent it is available, comparative information for the region and state. If the proportion of Medicaid patients served by GMSC differs significantly from the proportion at local hospitals, ACTD must provide a written explanation of the reasons behind the difference.
- ACTD must submit annually a report to the Board outlining the number and types of procedures performed at the GMSC, and to the extent it is available, comparative information for the region and state.
- ACTD must submit annually a financial report to the Board that includes the GMSC's net patient revenue, operating expenses, and profits.

2. Price Transparency

- a. ACTD must ensure that the GMSC's prices are available to the public on its website, and to patients who may receive care at the GMSC in advance of any procedure. The provider must give each patient a written disclosure that outlines the total price of the planned procedure, as well as the portion of such cost that would be the patient's responsibility, prior to scheduling the procedure at the GMSC.

Reporting

- ACTD must document the price disclosure in the patient's chart and provide the Board with its price transparency policy and/or materials at the Board's request.

3. Patient Financial Assistance

- a. ACTD must adopt and maintain a patient financial assistance policy (FAP) in line with the requirements of IRS regulation 26 CFR 1.501(r)-4 for all services provided at the GMSC.

Reporting

- ACTD must submit its FAP, application for financial assistance, and plain language version of the FAP to the Board and attest that the GMSC is following the FAP requirements of IRS regulation 26 CFR 1.501(r)-4. ACTD must submit its FAP to the Board whenever there is a change made to the FAP or surrounding policies.

4. Shared Decision Making

- a. To promote appropriate levels of utilization and patient-centered care, providers who practice at the GMSC must conduct shared decision making with each patient who may choose to have a procedure at the GMSC.
- b. Shared decision making must include working with patients to ensure that they are informed about and understand their choices and the clinical evidence behind those choices, that risks and expected outcomes are considered, and that patient preferences and values are appreciated.

Reporting

- Providers who practice at the GMSC must document the shared decision making process in the patient's chart and provide the Board with information about their shared decision making practices at the Board's request.

5. Informed Consent

- a. Prior to performing a procedure at the GMSC, the provider must inform the patient about the choices the patient has (e.g., having the procedure at the GMSC or at one or more hospitals; options the patient may have other than the procedure) so that the patient understands his or her options and the risks and benefits of those options.
- b. Patients must be informed about the GMSC's pricing for the procedure and its FAP. Additionally, patients must be informed if the provider has a financial stake (owner/investor) in the GMSC.
- c. Prior to performing a procedure at the GMSC the provider must obtain signed consent from the patient stating that the patient is informed about his or her

options and has been given pricing information, the plain language version of the FAP, and information about the provider's stake in the GMSC if applicable. The consent form must be in plain language and must be given to the patient in a manner that is understandable by the patient, including providing translators as necessary. The HCA must have the opportunity to review any consent forms and provide feedback.

Reporting

- ACTD must make its informed consent policies, procedures, materials, and forms available to the Board upon request.

6. Health Care Reform and System Participation

- a. ACTD and the GMSC must participate in good faith in health care reform and health care system improvement efforts, including providing input for hospitals' Community Health Needs Assessments, if asked, and continually working to provide high quality and high value care.

Reporting

- On an annual basis, ACTD must report to the Board on its health care reform and health care system improvement efforts. If ACTD encounters barriers to participation in these efforts, these must be reported to the Board in a timely manner.

Enforcement

- If any condition or component of a condition is not met, ACTD must submit a written explanation to the Board and suggest a corrective action plan.
- The Board may accept or amend the proposed corrective action plan, and may impose additional limitations on the surgery center or revoke the CON if the corrective action plan is not satisfactorily implemented.
- We recognize that in accordance with GMCB Certificate of Need rule 4.500(4), the applicant may seek relief from a condition in the future by filing a written request to the Board.

Thank you for considering our comments.

Sincerely,

s\ Julia Shaw

Health Care Policy Analyst, Office of the Health Care Advocate

s\ Kaili Kuiper

Staff Attorney, Office of the Health Care Advocate

3 MAJOR COMMERCIAL INSURERS



675 State Street, PO Box 2207
Schenectady, NY 12301-2207
mvphealthcare.com

1/10/2017

The Green Mountain Care Board
89 Main Street, Third Floor, City Center
Montpelier, Vermont 15620

Dear Members of the Green Mountain Care Board:

We are writing to you today in support of the pending application to approve the physician owned and operated multi-specialty ambulatory surgical center (ASC) in the greater Burlington area, Green Mountain Surgery Center.

MVP Health Care (MVP) has over twenty thousand members in the state of Vermont and is dedicated to providing them with the best quality health care at the lowest cost. It is MVP's experience in New York, that independent free-standing ASCs can not only be more cost-effective, but can provide patient convenience and higher patient satisfaction. MVP would look to contract with a licensed and certified ASC in our network if they could meet our stringent quality and reimbursement standards. ASCs and other non-hospital based services align strategically within value-based care programs to transform the health care paradigm to the benefit of Vermont citizens.

Therefore, MVP supports the Certificate of Need (CON) for this physician owned and operated multi-specialty ambulatory surgical center. As MVP continues to support the Green Mountain Care Board's initiatives and transformative health care model, MVP believes that the establishment of this facility embodies the value, cost and quality we strive to achieve in the state of Vermont.

Respectfully yours,

A handwritten signature in black ink, appearing to read "George Thomson", written over a horizontal line.

George Thomson
Network Management Vice President, Vermont
MVP Health Plan, Inc

Anita Soutier
AVP, Contracting
Anita.Soutier@cigna.com

MAR 23 - 2017



March 6, 2017

Green Mountain Care Board
3rd Floor City Center
89 Main St
Montpelier, VT 05620-3601

Re: Green Mountain Surgical Center – Certificate of need

To whom it may concern,

Cigna is pleased to present this letter of recommendation in support of Green Mountain Surgical Center's application for a certificate of need to offer an ambulatory service center in Vermont.

Having an ambulatory surgery center in the Burlington, Vermont area should increase access for Vermont residents to quality, cost-effective services. Consumers gaining access to the right care, in the right setting, at the right price is a goal Cigna supports.

We look forward to working with Green Mountain Surgical Center to see if there is an opportunity to bring them into our network of participating providers in the Burlington, Vermont area.

If you have questions, please do not hesitate to contact me.

Sincerely,

Anita Soutier
AVP, Provider Network Management
Cigna



BlueCross BlueShield of Vermont

An Independent Licensee of the Blue Cross and Blue Shield Association.

Andrew Garland
Vice President
Client Relations & External Affairs

March 16, 2017

Green Mountain Care Board
89 Main Street, 3rd Floor
Montpelier, VT 05620

Re: Green Mountain Surgical Center CON Application

Dear Green Mountain Care Board Members:

Blue Cross and Blue Shield of Vermont offers its support to the Certificate of Need application for the Green Mountain Surgical Center.

Our members benefit from having a robust network that offers a choice of settings in which they can receive care. For this reason, we credential and contract with any qualified provider that can offer high quality care to our members at competitive prices, as collectively we work toward reducing overall health care expenditures in Vermont.

Sincerely,

Andrew Garland
Vice President
Client Relations and External Affairs