

Thank you for allowing me to speak with you today. My name is Juli Larson. I'm an ophthalmologist practicing at New England Vision in South Burlington. I am also the founder and one of the current owners of The Eye Surgery Center also in South Burlington, the only ambulatory surgery center currently operating in Vermont. My thoughts that I will share with you today reflect my own perspectives as well as the general opinions of my partners at The Eye Surgery Center.

12 years ago I was granted the first CON for a private ASC in VT. At that time, only VT out of the 50 states had no ASC's... so we were the last to offer this to our citizens and patients, a viable tool to help lower the cost of healthcare that had been more than proven across the US.

During the CON approval process, it was suggested that we were a perfect test for VT to see if this would serve the people and patients of VT by reducing health care cost while maintaining, or possibly increasing the quality of care. I can tell you that I have always taken this trust placed in me very personally and I'm proud to report that in the 12 years since we have maintained the highest quality care, and level of certification, as well as fulfilling the reporting requirements to BISHCA for the first 7 years. It is estimated that we have saved VT Medicare over 10 million dollars. Today, I would like to suggest to you that the "test" has been a phenomenal success!

Fast forward 12 years and now we are looking at state licensure for ASC's. We are not opposed to this, however we are opposed to the addition of unnecessary cumbersome regulatory oversights and reporting requirements. There is already a tremendous amount of regulatory oversight. ASC's that are accredited by the joint commission and meet the criteria for licensure as passed by the Senate in S.73 will achieve a high level of quality while still being able to maintain lower costs. Part of the reason ASC's are able to provide services at lower fees is because of lower administrative overhead. All of our staff is involved directly in the care of patients. From checking them in as they arrive, administering medications, checking vital signs, to cleaning the

instruments. The administrative duties we do have, are performed by my nurse managers along with their clinical responsibilities. There is no full time administrative staff. I would ask the you don't impose additional requirements on our ASC which only adds to our overhead and doesn't provide any benefit to our patients.

We are a small business. We provide a valuable service to all Vermonters who are in need of eye surgery. We aren't funded by the State or underwritten by anyone. If we run over budget there is no risk for the taxpayers, because we as owners have personally guaranteed the financial operations of our health care facility. Requiring our center to report its "financial condition" does not improve the quality of care our patients receive, does not protect the State or its tax payers in any way it only adds more oversight and distraction hindering us from doing the job we are set out to do ...provide high quality care at a lower cost.

It is so easy to fall into the mind set that ASC's are like a small hospital so they should be regulated like one. They are not. We are a private small business, personally guaranteed by its physician owners, that provide the highest quality surgical care at roughly half the price of the hospital. Please allow us to continue doing what we love to do and don't impose additional requirements to S.73