



Good morning, my name is Devon Green with the Vermont Association of Hospitals and Health Systems, representing Vermont's hospitals, which are all nonprofit.

First, VAHHS is supportive of licensing freestanding birth centers. We are supportive of S.204 as it was passed out of committee.

Our concerns lie with the changes to the CON process in the proposed amendment. Freestanding birth centers are not the same as doctor's offices. They require a relationship with a nearby hospital should the patient need or want an epidural, induction or augmentation of labor, treatment measures for meconium in the amniotic fluid, continuous electronic monitoring, or need blood pressure lowering medications in labor.

The issue is that Vermont's hospital and birthing system is extremely fragile right now. According to the [CDC](#), Vermont has the lowest birth rate in the nation. You heard from Dr. Kat McGraw at Brattleboro Memorial Hospital that they lose \$4 million a year with their 24/7 birthing services, even after taking over the closed birthing unit at Springfield Hospital. More importantly, we need enough births to maintain the skillset of health care personnel within the units—hospitals may be able to share or shift other personnel to ensure maintenance of a skillset, but this option is not available in a 24/7 birthing unit.

VAHHS's concerns with the proposed amendment are laid out below:

- The amendment creates a precedent of carving out services and creates a new administrative process on top of our current administrative process
- What is the definition of "need" in the amendment?
 - Does it consider what it would take to maintain the skillset for both facilities?
 - Does it take into account EMT services and EMT availability in cases of emergency?
- How many freestanding birth centers can come into areas of need prior to 2026? Is there a limit? What happens if multiple freestanding birth centers open?
- What if a hospital's financial situation changes prior to 2026?

Thank you for this opportunity to testify on this important issue. Please feel free to contact me at devon@vahhs.org for more information.