



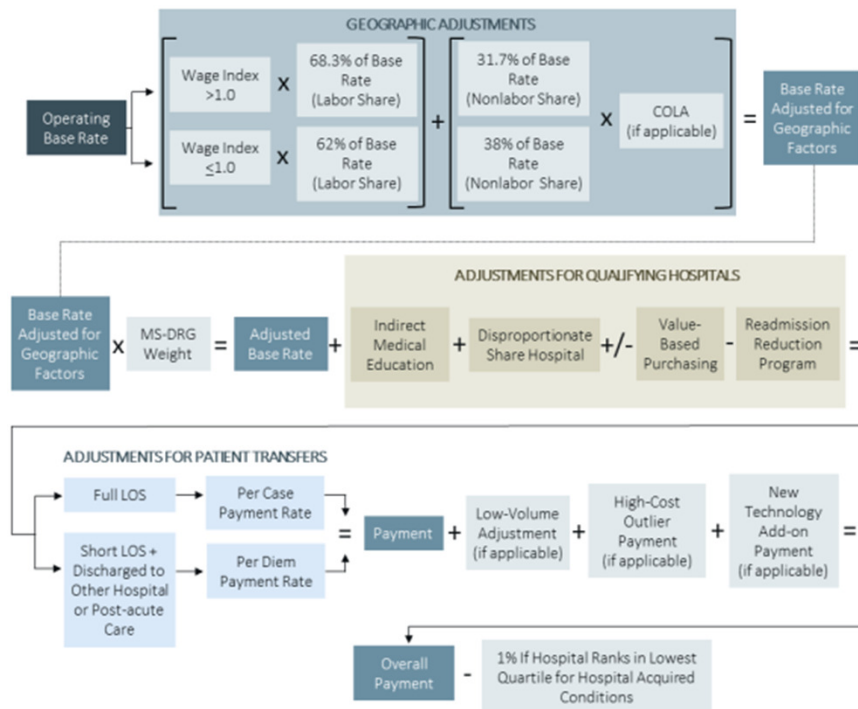
S.190 Green Mountain Care Board Bill

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1/28/26

Sec. 1: Reference-Based Pricing Reporting



- **S.190:** Hospitals report their prices as a percentage of Medicare or other benchmark
- **VAHHS Proposal:** For standardization purposes, GMCB calculates prices as percentage of Medicare and hospitals will post for transparency purposes

Sec. 2-5: Hospital Outsourcing

Brattleboro Reformer | BlueWater Health to take over emergency room care at BMH

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BlueWater Health to take over emergency room care at BMH

Jul 1, 2025

HEALTH

New emergency services team takes over at Springfield Hospital

By Katy Savage
April 9, 2019, 9:29 pm

S.190: Hospitals must

- Report outsourced services
- Put outsourced services under cap
- Subject outsourced services to the provider tax
- Hospital responsible for billing

VAHHS proposal: Report on outsourced services to inform the GMCB's decision-making process

Sec. 9: Appeals

S.190: The Green Mountain Care Board is not required to have an internal appeals process

The lack of appeals process has created confusion and uncertainty for hospital budgets.

VAHHS Proposal: Formalize an internal appeals process

Sec. 10: Hospital Investigation and Audits

S.190: The Chair of the Green Mountain can investigate and audit hospitals when reasonably necessary or helpful

Insurance Laws:

- 8 V.S.A. § 3563: Inspect and examine domestic insurers every 3-5 years
- 8 V.S.A. § 2117: For purpose of examination, or discovering or investigating violations or complaints

Sec. 10: Hospital Investigation and Audits

State Hospital Licensure: through the Department of Health. Under 18 VSA § 1905, hospitals are subject to examination of accounting records of all operating and complete operating and financial statements

DVHA: Hospitals are subject to Medicaid fraud and abuse oversight

Federal Hospital Oversight: Hospitals must comply with 629 discrete regulatory requirements across nine domains, including:

- Centers for Medicare and Medicaid Services
- Office of Inspector General
 - Investigates fraud, abuse, and inefficiencies
- Office of Civil Rights
- National Health IT Coordinator

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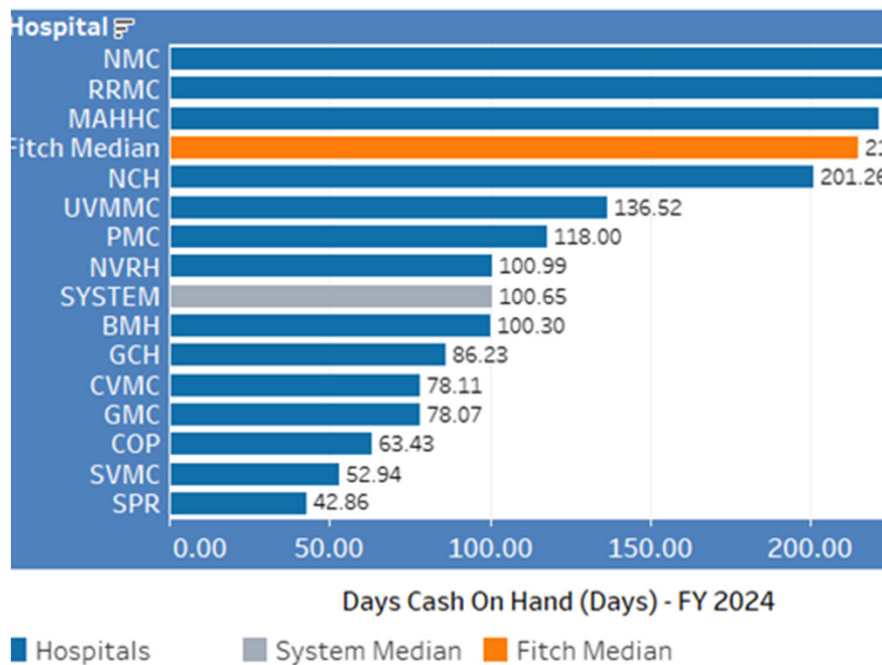
Act 49 of 2025: The Green Mountain Care Board (as opposed to the chair) may appoint an independent observer if a hospital:

- Materially misrepresents something
- Is materially noncompliant with the budget
 - This has been defined in guidance as a variation of 1%

VAHHS Proposal: Act 49 oversight meets the same needs as the audit authority proposed in S.190 and follows the current board governance structure.

Sec. 11: Health System Performance Tool

Financial Metrics



VAHHS has developed a hospital performance tool that will be available publicly soon.

Tool measurements include:

- Financial
- Quality
- Access