

August 14, 2019

DELIVERED ELECTRONICALLY AND VIA FIRST CLASS MAIL

Donna Jerry
Senior Health Policy Analyst
Green Mountain Care board
144 State Street
Montpelier, VT 05602

Re: Docket No. GMCB-019-18con
Replacement of CT Scanner and Related Renovations, Project Cost: \$2,024,027

Dear Ms. Jerry:

I am writing on behalf of Rutland Regional Medical Center to notify the Green Mountain Care Board of an inadvertent misidentification of the CT scanner in RRMC's application for a certificate of need and the resulting Statement of Decision and Order by the Board. The Application and the Decision identify the Replacement Scanner as a "64-slice" scanner. We now recognize that we erroneously described the Replacement scanner as a "64-slice CT scanner" where in fact the GE Revolution CT ES is a 128-slice CT scanner.

Upon information and belief, RRMC erroneously inserted "64-slice" in the name of the Replacement Scanner because the slice count was included in the name of the scanner we were replacing, the GE Lightspeed 64 Slice VCT. The Scanner that we purchased, the GE Revolution ES, does not include a slice count in its name. It was not until last week, when an individual in our radiology department mentioned to me the increased slice capacity of the Replacement Scanner, that I recognized this discrepancy in how we described the Replacement Scanner in our Application versus the actual product.

Importantly, the quote from GE for the Replacement Scanner that we submitted in response to the Board's first set of requests is for the same CT scanner that we did purchase. After this matter recently came to my attention, I reviewed the quote and discovered that on page 7 there is a reference to "256 slices." A representative of GE has since explained the reference to 256 slices: "The Revolution CT ES, is [GE's] 128 slice CT scanner that provides a larger detector and a larger bore than our other scanners. Like most of our scanners there is software that can double the slice-count by using overlapped reconstruction of the data (slices) collected." The GE Revolution only comes as either a 128 (with software to upscale to 256) or 256 (with software to upscale to 512).

The increased number of slices would not have changed our approach, except that we would have properly identified the number of slices in the Application. We needed a certain bore size

and detector coverage that we could only get in the form of a 128-slice scanner. They did not exist in a 64-slice scanner.

We do not believe that the actual Certificate of Need ("CON") issued by the Board requires amendment because it does not misidentify the Replacement Scanner. The Decision, however, which is incorporated by reference in the CON, does describe the Replacement Scanner as the GE Revolution 64-Slice CT Scanner. The GE Revolution 64-Slice CT Scanner does not exist. We selected the Revolution ES because, in terms of clinical functionality, this was the proper replacement, as identified by our physicians who defined the features this machine needed to have to treat our current patient population and support already existing services. This discrepancy in the description of the Replacement Scanner does not impact any of the other statements we declared in our Application and subsequent responses to questions, to wit: *This replacement will provide the same level of service that we currently offer with no new volume planned.* There is no change to the cost of this project from what we submitted.

We respectfully seek a determination that correcting the number of slices in the machine that RRMC all along intended to purchase and did in fact purchase is a non-material change in that it did not result in any increase to project costs and it would properly reflect the quote from GE.

Sincerely,



Claudio D. Fort
President and CEO