

To: Green Mountain Care Board

From: Tracy Dolan, Deputy Commissioner


Date: March 29, 2017

Re: Hospital Budget Review Guidance

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Thank you for this opportunity to provide comment on the Green Mountain Care Board Hospital Budget review process. The current guidance lists expenditures that GMCB would consider “credible investments in a reformed delivery system.” One of the items is “investments in population health improvement” (page 11). We would like to offer three suggestions for consideration in the review of proposals that may fit into this category.

First, we are very glad to see that GMCB has included budget guidance related to the Community Health Needs Assessment and the Community Health Benefits process and priorities. It is not entirely clear how this connects explicitly to a hospital’s proposed budget. We would recommend that investments in community infrastructure identified in the CHNA be included as an investment in population health improvements.

Second, we would urge consideration of evidence-based strategies aimed at primary prevention, self-care, and maintaining wellness found in the Clinical Guide to Preventive Services (<https://www.thecommunityguide.org/content/guide-clinical-preventive-services-0> developed by the [U.S. Preventive Services Task Force \(USPSTF\)](#)  Recommendations include the use of screening, counseling, and other preventive services that are typically delivered in primary care settings. The USPSTF, an independent panel of experts supported by the Agency for Healthcare Research and Quality (AHRQ), makes recommendations based on systematic reviews of the evidence related to the benefits and potential harms of clinical preventive services.

Last, we urge consideration of community-wide strategies for prevention found in The Guide to Community Preventive Services (<https://www.thecommunityguide.org/>) a collection of evidence-based [findings](#) of the [Community Preventive Services Task Force \(Task Force\)](#). The Community Preventive Services Task Force was established by the U.S. Department of Health and Human Services (DHHS) in 1996 to develop guidance on which community-based health promotion and disease prevention intervention approaches work and which do not work, based on available scientific evidence. The Centers for Disease Control and Prevention (CDC) is the DHHS agency that provides the Task Force with technical and administrative support.

We are happy to offer additional clarification and assistance.