

**STATE OF VERMONT
GREEN MOUNTAIN CARE BOARD**

**In re: ACTD, LLC, d/b/a Green
Mountain Surgery Center**

Docket No. GMCB-010-15con

RESPONSE OF NORTHWESTERN MEDICAL CENTER TO DATA REQUEST

Northwestern Medical Center, Inc. (“NMC”) provides the following information in response to questions posed to Jill Berry Bowen by members of the Green Mountain Care Board (“GMCB”) at the public hearing in the above-captioned matter on April 17, 2019. As summarized by Michael Barber, General Counsel and Hearing Officer to the GMCB, in correspondence dated April 19, 2019, “NMC was asked to provide information on the numbers of procedures/surgeries it performs that the Green Mountain Surgery Center (“GMSC”) is now projecting will be performed at the surgery center in the areas of ophthalmology and plastic surgery” and “If NMC has projections on how these numbers will be impacted by GMSC’s addition of these services, it may provide those projections as well.” Additionally, Board members requested information on the number of vitreoretinal procedures and on changes to the projections of procedures and surgeries at NMC that might migrate as a result of the GMSC’s revised projections or net effect of the revised projections. See TR (4/17/19) at 104-107.

NMC cannot project the numbers of ophthalmology and plastic surgery procedures and surgery from NMC which will transfer to the GMSC when it begins operations. The below table provides information on ophthalmology procedures performed at NMC in FY 2018 and the contribution margin (margin after subtraction of direct costs which contributes to overhead) for those procedures.

FY 2018 NMC Ophthalmology Procedures and Contribution Margin

CPT Code 66984 – Extra capsular cataract removal with insertion of intraocular lens prosthesis

| | |
|--|-----------|
| Number of procedures in FY 2018 | 439 |
| Estimated contribution margin for CPT Code 66984 | \$354,399 |
| Total Ophthalmology Procedures in FY 2018 | 511 |
| Total estimated contribution margin | \$584,495 |


Only one vitreoretinal procedure was performed at NMC in FY 2018. Plastic surgery numbers at NMC are very small at this time, so NMC cannot predict the impact of GMSC offering this specialty. Any loss of ophthalmology procedures, especially CPT Code 66984, will reduce NMC's margin and its ability to cover its fixed overhead.

NMC was also asked for information relating to the change in impact on surgeries of the revised surgery projections. TR (4/17/19) at 105-106. NMC has insufficient information upon which to calculate a potential net effect of GMSC's revised projections. However, an orthopedic surgeon performing hand procedures is expected to transfer cases to GMSC. The following table provides the potential impact that could occur as a result:

FY 2018 NMC Hand Surgery and Contribution Margin

| | |
|-------------------------------------|-----------|
| Total Hand Surgeries in FY 2018 | 150 |
| Total Estimated Contribution Margin | \$286,274 |

Dated in St. Albans, Vermont this 25th day of April, 2019.



Jill Berry Bowen, R.N., CEO
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