

Green Mountain Care Board
Public Comment Letter
April 20, 2019

Dear Board Members:

On April 17th I was able to attend my first Board hearing and it involved the Green Mountain Surgery Center (GMSC) and specific CON responses requested by the Green Mountain Care Board (GMCB). The following are observations and comments.

1. **Board Members:** There are no physicians on the Board. I realize that a policy is currently being discussed in Montpelier which would require a physician to be a member of the Board (a six year commitment may be challenging) and I support such a policy. Almost everyone on the Board comes from an economics or finance background and having a health care professional included in the group may help diversify input to the GMCB.

2. **GMSC:** In their presentation the GMSC speakers seemed to provide a clear description regarding modifications to the surgical provider mix from the original CON to what the current mix represents. After almost 4 years of a CON process I would expect some changes to the local provider pool.

1. Pain Management has pulled out of the surgery center.

2. Retinal surgery has been looking for a facility where they can schedule cases and GMSC seems like a good fit for their practice needs. The presentation they made was compelling and laid out numerous benefits for patients who require retinal eye care.

3. Plastic Surgery: Repeated questions from some of the Board members focused on the addition of plastic surgery as if this was the first time this service line was mentioned. As a community member I recall hearing talk a few years back that plastics would likely be a service offered at the surgery center. My curiosity led me to review the original CON dated July 2, 2015 and found the following: (copy and pasted from CON original)

“F. Scope of Services July 2, 2015, CON page 20.

The Green Mountain Surgery Center will be a multi-specialty ASC that provides elective, non-emergent ambulatory surgical procedures.³⁸ The Center will only host procedures that are not expected to pose a significant safety risk to a patient when performed in an ASC, and for which standard medical practice dictates that the beneficiary would not typically be expected to require active medical monitoring and care at midnight following the procedure.³⁹ It is anticipated that the majority of procedures performed at the ASC will be GI procedures, such as diagnostic and screening colonoscopies and endoscopies. In addition, the center will perform pain management procedures (e.g. epidural injections) and general surgery procedures (e.g. umbilical hernia repair). Due to interest from surgeons and patients in an ASC that offers lower costs, easier scheduling and greater efficiency for non-emergent surgeries and procedures than alternative sites of care, we anticipate that once the Green Mountain Surgery Center is up and running, there

will be strong demand to provide operating and procedure room time for physicians working in other specialties, including orthopedics, gynecology and plastic surgery. “

Anticipating that plastic surgery may likely be added as a future service line, GMSC referenced the plastic surgery service in the original CON application dating back to July of 2015.

3. GMCB. The Chair of the GMCB is tasked with “directing the board’s charge of curbing health care cost growth and reforming the way health care is provided to Vermonters.”

A review of the Role of the Green Mountain Care Board as outlined in the mission statement:

- 1. Ensuring a quality, affordable health care system.*
- 2. Plan for a system which reduces waste and controls cost.*
- 3. Testing new ways to deliver health care while building a new system.*
- 4. Work closely with health care consumers by promoting consumer involvement.*

The goal of the GMCB appears supportive of the mission and role GMSC will play in providing Vermonters with improved access to health care, innovating services for a more efficient health care delivery and reducing waste and cost in the process. The public support for the GMSC appears quite strong and enthusiastic as demonstrated in the numerous letters of support listed on the GMCB website from both large and small organizations as well as individual community members looking for an innovative health care model.

4. NMC. The population of Franklin County is very loyal to NMC and I would anticipate the local residents will remain loyal and continue to seek care from the hospital and its providers. NMC has always been one of the most financially stable hospitals in Vermont, and whether the past few years of budget deficits are the result of revenue caps vs. other financial stresses is not entirely clear. However, it is in the interest of our health care system to support the community hospital system so they remain viable to provide health care to our communities.

In Conclusion: The GMCB is doing a good job of steering a continuously evolving health care landscape and I would encourage a continuation of this by:

1. Supporting and possibly modernizing the current missions of the existing hospitals.
2. Recognize the innovative health care model that the GMSC is offering, and grant final approval of their CON.
3. Continue to promote and encourage innovation in our health care system so all Vermonters may benefit.

Respectfully;

Stephen Mason, M.D.