

March 18, 2019

By Email and First Class Mail

Donna Jerry
Senior Health Policy Analyst
Green Mountain Care Board
144 State Street
Montpelier, Vermont 05620

RE: Docket No. GMCB-010-15con, Green Mountain Surgery Center

Dear Donna:

Please find below a checklist that provides an overview of the current status of the Green Mountain Surgery Center's (GMSC) compliance with conditions 1 – 18 of the Certificate of Need (CON) issued July 10, 2017. We have also enclosed with this letter evidence and documentation relating to several of the conditions:

- Condition 5 – An updated MOU with the Colchester Rescue Squad EMS transport service
- Condition 10 – Evidence based studies supporting procedures/surgeries to be offered at GMSC
- Condition 11 – Articles 1-4 of the GMSC's Medical Staff Bylaws showing the requirement that physicians have admitting privileges at a local hospital
- Condition 14 – A copy of GMSC's Benefits Verification Policy
- Condition 15 – A copy of GMSC's Free or Discounted Care Policy and GMSC's Free or Discounted Care Application
- Condition 16 - A copy of GMSC's After Hours Care Policy
- Condition 17 – GMSC's Collaborative Care Agreement

We are providing this information in response to the request made in your pre-hearing letter that we provide information pertaining to the conditions in advance of the hearing in order to streamline the Board's review process. Please contact me with any questions.

Thank you,

Amy Cooper

**STATE OF VERMONT
GREEN MOUNTAIN CARE BOARD**

In re: Application of ACTD, LLC
For Green Mountain Surgery Center

CERTIFICATE OF NEED: CONDITIONS CHECKLIST

	Conditions:	Complete
1.	Consumer-friendly website that provides information about each physician and procedures and surgeries offered Notes: Pending	
2.	Develop and implement policy requiring physicians use a shared decision-making process with patients Notes: Policy submitted to Board March 2018. The policy will be signed by each physician and on file in each physicians credentialing folder at the GMSC.	✓
3.	Develop and implement policy requiring physicians to accept patients without regard to payer type, insurance status, or ability to pay Notes: Policy submitted to Board March 2018. The policy will be signed by each physician and on file in each physicians credentialing folder at the GMSC.	✓
4.	Enter into a transfer agreement with local hospital Notes: Pending	
5.	Enter into a transport agreement with EMS service for emergency patient transfer Notes: Updated signed agreement submitted to the Board on March 18, 2019	✓
6.	Enter into a participation agreement or MOU with ACO(s) Notes: Executed MOU with OneCare VT submitted to the Board on April 19, 2018	✓
7.	Enter into agreement with Centers for Medicare and Medicaid Services (CMS) to operate as Medicare-certified ASC Notes: Pending	
8.	Consumer website available to public no later than two weeks prior to opening Notes: Pending	
9.	Post to website the commercial/self-pay and Medicare prices for most commonly performed surgeries Notes: Pending	
10.	Shall not offer services without first demonstrating to Board that such services are evidence-based and fall within scope of CON Notes: Academic articles showing evidence-basis for procedures to be offered by specialty submitted to the Board on March 18 2019	✓
11.	Require that each physician have admitting privileges at local hospital(s) Notes: This is a requirement to join the medical staff at the ASC, per copy of relevant portion of GMSC Bylaws submitted to the Board on March 18 2019	✓

12.	Negotiate with insurer(s) to accept reimbursements for procedures/surgeries that are below the reimbursements paid to hospitals for the same procedures/surgeries	
	Notes: Pending	
13.	Price to self-pay patients must not exceed lowest price billed to patients covered by commercial insurance	✓
	Notes: The GMSC Self-pay Policy dictates that patients will not be billed more than the lowest price paid by commercial payers for the same procedures/surgeries; GMSC Self-Pay policy submitted to the Board on 1/31/2019	
14.	Provide potential patients with a written price estimate on request and provide all patients in advance of surgery with written disclosures that outline the total price of the procedure/surgery and patient responsibility	✓
	Notes: This process outlined in GMSC 'Benefits Verification' Policy. A copy of the Policy submitted to the board on March 18, 2019	
15.	Establish and implement a policy to provide charity care on par with UVMHC and NMC and post to the Center's website	✓
	Notes: GMSC 'Free and Discounted Care Policy' is on par with UVMHC and NMC. A copy of the Policy submitted to the Board on March 18, 2019	
16.	Physicians must maintain after hours on-call policies and 24-hour call coverage for patient inquires. GMSC must provide patients with written instructions for after-hours care and have emergency information recorded on the phone line.	✓
	Notes: This process outlined in GMSC 'After-Hours Care' Policy. A copy of the Policy submitted to the board on March 18, 2019	
17.	Obtain accreditation by Joint Commission on Accreditation of Healthcare Organizations (JCAHO)	
	Notes: Pending	
18.	All physicians must sign a Collaborative Care Agreement	✓
	Notes: GMSC Collaborative Care agreement submitted to Board in March 18, 2019. The policy will be signed by each physician and on file in each physicians credentialing folder at the GMSC.	