

Green Mountain Surgery Center  
Public Comment  
April 24, 2019

**1. Meg Smith**

I am commenting on the Green Mountain Surgery Center's application for additional ophthalmology and plastic surgery services. There is absolutely NO reason that this business should not be able to offer those services in addition to the other procedures current permitted. This is not a matter of compliance, this is a matter of the marketplace. There has been a monopoly of medical services in northern Vermont and now that there is a "new kid in town" the idea of competition is causing the old guard to scream loudly because their toes are being stepped on for the first time. This is called competition and there is nothing wrong with it! I find it incredibly offensive that businesses like Eye Care of Vermont are fighting this surgery center when our economy is based on competition. Duplication of services is not a bad thing, it gives people choices - what could be wrong with that? Please vote to allow the Surgery Center to offer whatever medical services they wish. Maintaining a monopoly is not a good thing and reflects poorly on the Green Mountain Care Board as well.

**2. David N. Schwartz**

Hello, I am an independent gastroenterologist and planning on performing procedures at the Surgery Center. I am puzzled as to why there is such "push back" from "competitors" if we understand that the goal in health care is to offer value which consists of quality and cost. Both will be offered at the Surgery Center. It seems that many are more concerned with maintaining a monopoly status and protecting profits and that health care is micromanaged in VT and this is not working very well. More and more providers are leaving this state and now is not the time to restrain competition. Thank You

**3. Lois Parmelee**

Allowing the surgery center to open will be a cost saving for health care costs that are escalating. Plus I already had to wait 6 months for a procedure and that is with the center opening. Let's think about the patient instead of the dr.s / hospitals pocket book

**4. Alan Landau MD, Yale New Haven Health**

I am writing to support the need for Green Mountain Surgery Center. I have been involved in the opening of an ASC in New Haven and then in Bridgeport Connecticut. In both instances the local hospital and medical system contested the openings of the units. They stated the same concerns that are being levied today by local units and UVM medical center. None of their fears came to fruition. The patient satisfaction and access to quality increased and the other providers did not suffer undo consequences. Our centers had great reviews from the Joint Hospital Commission and State regulators for quality and patient safety. Access and ease of care dramatically increased with no negative effect on the local medical community. In fact, we demonstrated a clear increase in colon cancer screening rates in an 80 doctor multi specialty group within 2 years of opening. I have seen this story before from existing competitors to squash new entities based on their economic interests and not on the needs of patients. I strongly encourage you to support the CON for Green Mountain Surgery Center.

In my prior comment about ASC development in Vermont I did not mention that I don't think I would have agreed to leave Connecticut to come to Vermont without such facilities like Green Mountain Surgery Center to practice in. I know there's a shortage of gastroenterologists and ASCs are the best way to effectively utilize resources. I know, I have done this before.

**5. Glen Findholt**

Green Mountain Surgery Center  
Public Comment  
April 24, 2019

I am writing to urge the Green Mountain Care Board's support of the Green Mountain Surgery Center. As we have watched the UVM Medical Center's growth and control of our health care system we wait to no avail for efficiencies that will reduce the rapid rise of healthcare costs. Therefore I have concluded that only competition will yield improvements in our healthcare costs. Protecting monopolies in the existing market is not in the interest of the people of Vermont.

**6. Melinda Moulton**

There is another effort for the hospitals in this State to try to stop the opening of the surgical center in Colchester. I have been a long - strong - and devoted supporter of the folks who are opening the center and who have worked long and hard to get this project up and running for folks like me who WANT ANOTHER option to the Hospital.... Choice of medical care helps to keep down costs and also to improve excellence. What are the hospitals afraid of? Why do they have to fight this so hard? Look at the greed and selfishness they are exhibiting. I want this surgical center to open for me and my family - I want choice in my medical care - I want options - and these folks trying to get this center open are truly wonderful, kind, and caring Vermonters. Please do not cower to the Hospitals and allow them to curb and limit the ability for this center to open. PLEASE...thank you Melinda Moulton.

**7. Susan Ridzon**

Dear Green Mountain Care Board,

Please allow the Green Mountain Surgery Center (GMSC) to open as planned, without delay or further restriction. The GMSC will decrease wait times and will make Vermont more attractive to physicians. These are known challenges in Vermont as evidenced by a recent WCAX story <https://www.wcax.com/content/news/Waiting-Pains-The-challenge-of-wooing-doctors-to-Vermont-508763641.html>. The GMSC can be part of the solution to these issues.

As Executive Director of HealthFirst, Vermont's independent practice association, I've seen first-hand the positive impact the planned surgery center has had on the independent physician community in Chittenden County.

The GMSC already has attracted doctors to Vermont and also has helped Vermont retain its physicians. Lack of timely access to procedure space has long been a frustration for many of our physician members and has contributed to unnecessary delays in patient care. The decreased waiting times that are expected with the planned surgery center has been a sustaining ray of hope for many physicians and patients. Please let that hope be delivered as planned.

I also find it troubling that the GMCB seems to be changing the rules of the CON process. The GMSC's CON is for a multi-specialty center with no restrictions on which specialties can be offered. The addition of ophthalmology and plastic surgery specialties by the GMSC was in response to pent-up physician demand. Further, the addition of these specialties did not increase the surgery center's revenue or volume projections. In fact, as discussed at the 4/17 hearing, the updated projections resulted in contraction of the GMSC's expected revenue and volume. Fear of competition by other local health care facilities who have enjoyed a near monopoly for decades (and in many cases, is way overcharging Vermonters) is not, in my opinion, a valid reason to halt or delay the GMSC opening. The GMCB should be encouraging competition and an increase in high quality options for Vermonters, not squelching them.

I also support the immediate opening of the GMSC as one of many Vermonters who has a high-deductible health plan. It will give us a much-needed, high quality/lower cost option for procedures that don't require a hospital setting, helping us to reduce our out of pocket costs. The surgery center is also committed to price transparency - something that's sorely lacking in our health care environment - and

Green Mountain Surgery Center  
Public Comment  
April 24, 2019

appreciated by anyone who has tried to figure out how much going to the doctor will actually cost them. For all of these reasons, please let the Green Mountain Surgery Center open as planned, without delay or further restriction. Thank you for the opportunity to comment.

**8. Susan MacLennan, MD**

Dear members of the Green Mountain Care Board,

April 20, 2019

I am a Plastic and Reconstructive surgeon with almost 20 years of experience in practice. I previously practiced in Vermont for 15 years. I was deeply involved in the care of women with breast cancer in Vermont and the North Country of NY, but in 2015, I left the community I loved and the patients I loved serving, and moved to western Canada. At that time, the options for a subspecialist surgeon to practice in our community were few. When the GMCB approved the CON application for the Green Mountain Surgery Center in the summer of 2017, we finally had hope that there would be another option for patients and surgeons in Vermont. In the fall of 2018, my husband and my young family and I moved back to the community that felt like home to us. We now live in South Burlington, my children attend South Burlington schools, and I employ Vermonters in my new practice in Colchester.

Lest you think that we don't need plastic surgery in Vermont, I want to tell you a little about my specialty. Most plastic surgeons practice a broad range of plastic and reconstructive surgery. On a typical day, we might see a woman with breast cancer, a baby with cleft lip and palate, a senior citizen with a skin cancer, a young mother who wants cosmetic breast surgery after having children, and a patient with a traumatic injury that needs repair.

This is the broad spectrum of plastic surgery in Vermont.

It's so important to have options for these patients, and now we are on the verge of having a new option. In this era of higher deductible health insurance plans, our patients need to know their options, the prices of these options, and what their responsibility will be. The Green Mountain Surgery Center is an important step in bringing high quality, lower cost care to our community.

I have the recent experience of having operated in both a hospital and an outpatient center in the same community in Alberta, and I can tell you that hospitals and surgery centers can and do coexist collaboratively and peacefully in most communities. I was able to consistently offer very efficient, high quality, safety-focused care in the outpatient center, while still utilizing the fuller spectrum of services at the hospital for patients who needed that level of care.

The surgery center is so important to the medical community in Vermont. We have already been able to attract several talented young doctors to the community since we received the approval from the GMCB, even in advance of the center's opening. Our independent practices are better able to recruit, bringing in more specialist options for the people of our little state.

This should lead to shorter wait times, and a better ability to receive care closer to home rather than needing to go out of state. I myself am already seeing many patients who have been told elsewhere in our community that they cannot have surgery until the fall of 2019, or who had been planning to go out of state to access more timely care. Allowing the GMSC to open as planned this spring will ease these long wait times. I have no doubt that more young specialists will also follow as we make community practice here more feasible for them.

The diligent work of Amy Cooper and the physician owners of the GMSC has allowed us an important new option in our community. These doctors are dedicated to low cost, efficient, personalized patient care. I am one of several new surgeons who have come to the community based on the imminent opening of the new Center. Please, do not limit the GMSC permit, or delay its opening any

Green Mountain Surgery Center  
Public Comment  
April 24, 2019

longer. Vermonters deserve timely access to cost-effective care and are harmed when their options are limited.

**9. Susan Murray**

I am writing to urge you NOT to impose any new or additional conditions or limitations on the Green Mountain Surgery Center, since they have already received their Certificate of Need. UVM is a wonderful hospital, and we all rely on them for complicated medical surgeries, but it is not fair to consumers to make us pay more for simpler surgeries that can be done more cheaply and more quickly at an outpatient surgical center. I have had successful cataract surgery at an outpatient surgery center, and my spouse has had a successful kidney stone procedure at an outpatient surgery center.

Both procedures were done more quickly and less expensively than could be done at the hospital.

Please don't place limitations on this new center. Let them do what they will do best, and let UVM MC do what it does best.

Thank you.

**10. William Parmelee**

I am commenting on the new Green Mountain Surgery Center. I think it is needed. It is common to hear that the local hospitals have a long list of patients waiting to have surgery. Timeliness is important in many cases. I was diagnosed with cancer in Oct and the original surgery was scheduled in Feb.

Fortunately with a lot of effort by the scheduler, the surgery was done in Nov. I can only imagine if I had to wait an additional 3 months.

Competition is good. It makes all parties more attentive to the needs of the patient. I owned and ran my business for over 20 years. A new party in the mix was not really wanted but it certainly made all the old businesses pay attention. I think this is very much needed in the medical field. Someone will not leave if they are happy with the service they are receiving. Money is secondary. I know this from years of experience.

You must approve to let this place run plus the eye surgery people must accept they are not the only game in town. You must stop people from changing the rules as this place is trying to get started.

**11. Andrea Regan**

I just wanted to write in support of the Green Mountain Ambulatory Surgical Center. The surgical center will do 4 important things

1. Drive down the cost of health care in Vermont. I am sure the board is well aware of the high cost of services at UVM. Some consider UVM a monopoly, and as it grows so is the cost of our health care.. A friend of mine was recently pricing out the cash price of a CT scan of the abdomen (a relatively routine diagnostic test) at Porter and UVM and was quoted \$2,900 vs. \$5,300, respectively. This difference in reimbursement for equivalent services has given UVM significant financial stability while smaller hospitals struggle. I am sure you have seen other examples in the news-- \$980 for influenza tests, etc. This is just not sustainable and we need to promote a healthy market.

2. Allow for shorter wait times: It has been only recently that regulators are starting to learn what many Vermonters already know--we have very long wait times. I was part of a Burlington Free Press Article on wait times a few years ago, in which my patient was featured. For this article I gave wait times based off of real data from my patients for UVM Spine Center, showing 42-97 day wait times (we have to track this for quality assurance measures). UVM provided data for the same time frame showing 2-4 weeks for the prior 3 year period. While this data may have reflect "next available" due to cancellations, when the reporter called he was told it would be over 2 months out (I verified with

Green Mountain Surgery Center  
Public Comment  
April 24, 2019

multiple other providers and this was the same thing that referring physicians are told). You will hear a lot of statistics during testimony, but you have to look at them critically and ask, is this the experience of the majority of patients in Vermont?

3. Allow new providers to come to the area: We are losing numerous specialists. In some cases contracts are forcing them to say that they are retiring or want to move out of state, while in reality they are being driven out by aggressive non-compete clauses and fear of retribution. The private sector is also fearful of UVM. During interviews for the above mentioned article, one private specialist stated, "If UVM doesn't want you here you're gone" and declined to go on the record. To be honest, I am fearful in even submitting a comment for fear of retribution, but this topic is way too important.

4. We have learned a lot of lessons about treating institutions as "too big to fail": Much of the public assume that physician-owned practices are failing for the same reasons that mom-and-pop stores close when facing a competitor such as Walmart. This is wrong. In using the same analogy, it would be if Walmart cost significantly more for the same product as mom and pop stores, but shoppers were unaware because the bills are too confusing and many are not paying directly.

The Green Mountain Surgical Center is critical for the survival of healthcare as we know it in Vermont. It sounds dramatic, but mark my words. Our public deserves affordable healthcare. Your average middle of the road worker is really feeling beaten down right now. They are forced to pay large amounts of taxes so that over half of our state's population can be well insured (medicaid, medicare, government employees, teachers, police officers, etc). In turn they are left with premiums and deductibles that are debilitating. Many of our plans that are "normal" deductibles require you to pay 40% of the cost of imaging. So that basic CT scan of the abdomen, as mentioned above, could cost you >\$1000 out of pocket at UVM. While patients who have low deductibles such as medicaid and medicare decline to drive the extra 30 minutes to Porter because it costs them the same, much of our working population are fearful of getting things like diagnostic mammograms due to the potential cost (myself included last winter). We need to give our state the tools for a healthy market. Thank you for your consideration.

## **12. Hobart Popick**

I have been following the recent media coverage of the Board's decision to allow re-opening of testimony regarding the Board's decision to grant a Certificate of Need to the Green Mountain Surgery Center. This seems like a needless waste of time and resources that could be better spent on improving care for patients. In fact, that is exactly what the Surgery Center seems to be trying to do by providing patients another option for care in Vermont. Currently, wait times for non-emergent surgical procedures in this area can be six months or more. Having another location that can provide surgery services in Vermont so that patients do not have to wait for the care they need (or travel to Hanover, or even Boston or New York) improves patient care. The Center's competitors (mostly UVMMC) seem to be advancing the idea that increased competition in this market would increase costs. That is contrary to basic market principles and just doesn't make sense. The exact opposite is true. I am strongly in support of limiting the ability of the Surgery Center's competitors to re-open old arguments that the Care Board has already rejected, and to leave the Center's Certificate of Need in place.

Green Mountain Surgery Center  
Public Comment  
April 24, 2019

**13. Jeffrey Mongeon**

Any resistance to the Green Mountain Surgery Center from competition should be ignored entirely. It is not in the best interest of the citizens to have monopolies on surgical procedures. This is especially true due to wait times and high costs. Green Mountain Surgery bring a much needed option for both patients and doctors.

**14. John Alan Day**

S-73 An act relating to licensure of ambulatory surgical centers.

To me, excessive regulation and taxation works against the public need for health care. By public need, my major concern is the state population is aging which means we will need more, not fewer, surgical centers to accommodate the needs of an older population. Consider the wait times of knee/hip surgeries or in my case a colonoscopy/enterscopy procedure. Delays for these procedures can be alleviated through added surgical centers. Hence my support for less onerous regulation and taxation.

**15. Ginger Isham**

We need the Green Mountain Surgical Center!! There are some wonderful physicians in the area not connected to the VMC staff and deserve this center as well as patients in the area who could be serviced more quickly without time constraints.

**16. Melinda Petter**

re: Green Mountain Surgery Center CON (GMCB-010-15con)

I support the Green Mountain Surgery Center and other independent surgical centers which may choose to locate in VT. At this time the UVM Medical Center is a monopoly provider of most surgical procedures in Chittenden county. As a local resident I welcome the arrival of a high quality, alternate, and hopefully competitive, option. Please require only the oversight needed to ensure independent surgical centers provide safe procedures and transparency for patients. Do not require burdensome regulations which only increase health care costs without providing better health care for patients. Thank You.

**17. John McSoley**

Re: Green Mountain Surgery Center

I hope the board will decide favorably on the certificate of need for the proposed surgery center. The center will be a needed addition to the choices for Vermont's surgery patients. In addition to increasing patients' health care choices, it will be cost effective and convenient.

**18. Gay Regan**

As a patient I feel that we need the new Surgery that is supposed to open this summer. My understanding is that the hospital does not want the competition, but I think the waiting time in some specialties is too long at the hospital. Also there is a shortage of doctors in some areas and the Surgery will bring in new doctors. My understanding is the proposed Surgery already had a certificate of need and they should not have to go through that process a second time. Lastly, they will probably be less expensive and save money for patients and for our health system in general. I think that it is important that patients can find out in advance what a procedure costs and compare the cost to what the hospital would charge for the same procedure.

Green Mountain Surgery Center  
Public Comment  
April 24, 2019

**19. Brian Calhoun**

Comment: Please support the Green Mountain Surgery Center. The GMSC is valuable to the community for many reasons. A plastic surgeon has already moved to the state just because of the GMSC. Not every provider wants to work for UVM. Having the freedom to open their own private practice is attractive to many practitioners, and the GMSC makes that possible. That means more specialist providers to care for Vermont residents. This gives Vermonters a choice of where to go for care. Many people would prefer not to be cared for by interns and residents. That choice doesn't always exist in Burlington and surrounding towns. Don't listen to other providers who are just trying to protect their bottom line. Let competition result in better care for patients! Give Vermonters a choice and access to more specialists. Give specialists a new reason to come to Vermont. Support GMSC!