

# VERMONT LEGAL AID, INC.

## OFFICE OF THE HEALTH CARE ADVOCATE

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July 23, 2020

Kevin Mullin  
Chair, Green Mountain Care Board  
144 State Street  
Montpelier, VT 05602

To Chair Mullin and Members of the Green Mountain Care Board:

Thank you for soliciting comments on the Green Mountain Care Board (Board)'s hospital sustainability planning. The Office of the Health Care Advocate (HCA) supports the Board's efforts to ensure that Vermont has a sustainable statewide health care system. This work is especially important given the financial challenges faced by many of Vermont's hospitals prior to COVID-19 as well the ongoing financial challenges related to COVID-19. It is also essential to consider the financial catastrophe that many Vermonters are currently facing. The HCA strongly supports the Board's proposal to look at hospitals' private price ratio, charge mark-up, quality measures, and provision of essential and other services.

We remain concerned that price increases and service cuts are not the path to sustainability for Vermont's hospital system. We urge the Board, the hospitals, and other stakeholders to think more broadly about how to build a sustainable hospital system without relying on untenable commercial price increases or elimination of services that Vermonters need in their local communities. Particularly considering COVID-19, its financial impacts on Vermonters, and the uncertain duration of service volume decreases, we caution against relying on commercial price and volume for financial sustainability.

We heard the push back from the Vermont hospital community to the Board's proposal. We of course support a timing and implementation plan that respects the burden that Vermont hospitals are carrying given COVID-19. We are confident that the Board can balance the burden on hospitals and the urgent need for statewide hospital sustainability planning.

We believe this is the time for Vermont to think beyond the ways in which health care is currently financed to ensure that our rural hospitals can survive and provide the services needed by Vermonters in their communities in an affordable way.

Thank you for considering our comments.

Sincerely,

s\ Julia Shaw, Health Care Policy Analyst  
s\ Mike Fisher, Chief Health Care Advocate