

August 17, 2020

Donna Jerry, Health Care Administrator
Green Mountain Care Board
114 State St
Montpelier, VT 05620

RE: Request for expedited review of Docket No. GMCB-019-19con CON application to modernize SVMC's emergency department and hospital main entrance

Dear Donna Jerry,

Southwestern Vermont Medical Center (SVMC) requests expedited review of the Certificate of Need (CON) application to modernize its emergency department and hospital main entrance. The CON application (Docket No. GMCG-019-19con) meets criteria under both the Vermont Statute 18 V.S.A § 9440(c)(5) and Section 4.304 of the Green Mountain Care Board (GMCB) Rule 4.000. Since the statute and rule have similar criteria, the description below combines the adherence.

No competing project exists [18 V.S.A § 9440(c)(5)(B)(i) and GMCB Rule 4.304(5a)]
No competing project has been identified or submitted to the GMCB.

Project is uncontested [18 V.S.A § 9440(c)(5)(B)(i)(I) and GMCB Rule 4.304(1a)]
The CON application (Docket No. GMCG-019-19con) is uncontested.

No party holds interested party status [18 V.S.A § 9440(c)(5)(C) and GMCB Rule 4.304(5b)]

No party holds interested party status for the CON application. Individuals and organizations representing the community with mental health conditions have amicus curiae status and have submitted a letter in support of the project (letter posted to the GMCB CON web site on June 2, 2020).

Project does not substantially alter services [18 V.S.A § 9440(c)(5)(B)(i)(I) and GMCB Rule 4.304(1a)]

The CON application does not substantially alter services and is a replacement project. The project involves three areas that are currently in service;

- Emergency department
- Main entrance and lobby area
- Main parking lot and traffic flow

The emergency department portion of the project involves modernizing both medical and mental health crisis treatment spaces, both of which currently exist.

Project does not raise significant health care policy or planning concerns [GMCB Rule 4.304(2a)]

The project does not raise health policy or planning concerns. SVMC is dedicated to delivering high quality care in the most appropriate setting. Modernizing the emergency department will enable SVMC's care team to implement best-practice care protocols and advance the patient experience.

SVMC recognizes that the emergency department is the most costly care site. Moreover, upgraded emergency department facilities often attract patients that otherwise would seek care at lower cost sites, particularly primary care practices and urgent care centers. As described in the initial CON application and SVMC's response to the GMCB's first round of questions (posted to the GMCB CON web site on June 17, 2020), SVMC has made investments to expand primary care and urgent care access.

Importantly, SVMC has many programs directed at reducing unnecessary emergency department utilization. Many were described in the initial CON application and SVMC's response to the GMCB's first round of questions. The modernized emergency department is designed to more efficiently treat 20,000 patients annually, a 16% reduction from the 24,000 patients currently treated.

The project to modernize SVMC's emergency department does not raise policy or planning concerns when considered in the context of other investments and efforts to ensure patients have access to the best care in the most appropriate setting.

Expenditures of the project do not significantly impact services provided, the cost of healthcare, or the financial strength of the applicant [GMCB Rule 4.304(2bi)]

SVMC has a sound and sensible financial plan for the project, as described in the initial application. The financing for the project is described in detail in initial CON application and SVMC's response to the GMCB's first round of questions. In brief, SVMC can afford the project without impact on the financial strength of the institution.

Project does not create service duplication [GMCB Rule 4.304(1e)- reference to 18 V.S.A § 9431(a)]

SVMC's emergency department is the only emergency department in southwestern Vermont. The nearest emergency departments in Vermont are more than 1 hour away at Rutland Regional medical Center and Brattleboro Memorial Hospital. The project will modernize the regions only emergency department and not duplicate it.

Project is consistent with policies expressed in 18 V.S.A § 9431(a) - most notably the project improves the quality of and access to health care services [GMCB Rule 4.304(1e)- reference to 18 V.S.A § 9431(a)]

SVMC's modernized emergency department will allow the care team to efficiently deliver the highest quality care possible. The facility layout, particularly the vertical treatment spaces, will expedite diagnoses and treatment, and thereby decrease wait times and increase access. SVMC's modernized emergency department is consistent with the policies expressed in the statute.

We thank the Green Mountain Care Board for considering expedited review for this important project.



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