



Where People Come First

October 8, 2018

Donna Jerry, Health Policy Analyst
Dept. of Banking, Insurance, Securities
& Health Care Administration
89 Main Street, Drawer 20
Montpelier, VT 05620-3601

Dear Ms. Jerry:

We are planning a switch in our EMR systems from a variety of providers, All Scripts, T-Systems and Evident to Cerner for our entire system. Our system consists of Springfield Medical Care Systems (SMCS), which contains an FQHC and is the parent to Springfield Hospital. Both companies file separate cost reports and tax returns and have unique Taxpayer Identification Numbers.

The cost for the system is \$3,971,733. Of this amount \$1,500,000 will be to replace All Scripts which is an SMCS system only (used by FQHC providers), the remaining amount (\$2,471,733) will be to replace the systems used by Springfield Hospital. Total operating expenses will remain essentially flat once the new systems are installed.

We are looking for some jurisdictional guidance as to whether this would be looked at as two separate EMR conversions and fall below the CON threshold or one conversion and subject to CON requirements. It is our contention that this is two separate EMR conversions for two separate companies.

Please do hesitate to contact us if we can be of further assistance.

Sincerely,

A handwritten signature in blue ink, appearing to read "Scott Whittleman", written over a faint, illegible typed name.

Scott Whittleman CFO
Springfield Medical Care Systems/Springfield Hospital