

**SENT ELECTRONICALLY**

April 7, 2021

Mr. Craig Miskovich  
Downs Rachlin Martin, PLLC  
PO Box 99  
St. Johnsbury, VT 05819

**RE: Docket No. GMCB-009-20con, Proposed Purchase of Ambulance Services by  
WLRC Medical, Inc.**

Dear Mr. Miskovich:

Thank you for the application for the above-referenced project. We are in the process of finishing our review of the financial tables and will send any questions we have regarding those documents under separate cover. Please provide the following information:

1. Provide an overview of WLRC's staff training and protocols for transporting individuals experiencing a mental health crisis.
2. Provide information regarding the treatment of individuals experiencing a mental health crisis relative to an individual experiencing a medical crisis and whether your policies and protocols for restraining individuals are the same in either situation.
3. Provide an overview of WLRC's staff training and protocols for transporting individuals with a suspected or confirmed overdose.
4. Describe generally how AmCare is reimbursed by private payers (e.g., fixed fee schedule tied to Medicare rates) for transportation services and for supplies.
5. From the time WLRC entered into a managed services agreement with AmCare to the present, explain whether there has been an increase in reimbursements for AmCare's services, in excess of medical inflation, for any type of payer including commercial and self-pay. Also, explain whether there have been alterations to AmCare's agreements with insurers that have changed AmCare's status as an in-network or out-of-network provider.
6. During the first three years after acquisition, explain whether WLRC expects to secure reimbursement increases in excess of medical inflation for any type of payer including



commercial and self-pay, for services previously provided by AmCare and explain whether WLRC expects to alter AmCare's agreements with insurers that would change WLRC's status as an in-network or out-of-network provider.

7. List each of the programs, services and collaborations with other Vermont entities (including those noted on page 11 of the application) provided by AmCare that WLRC will maintain and continue once the acquisition is complete; any programs, services and collaborations WRLC will discontinue; and any new programs, services or collaborations WLRC will add.
8. CON Standards 1.9-1.12: Clarify whether there will be any new construction or renovation of existing buildings/garages etc., that are part of the proposed purchase in years 1, 2, or 3. If yes, explain whether such construction and/or renovation costs are included in all financial tables submitted for years 1, 2, and 3.
9. Once the acquisition is complete, confirm the "doing business as" (d/b/a) name that will be used for the ambulance service.

In responding, restate the question in bold font and respond in unbolded font. Send an electronic copy to me at [donna.jerry@vermont.gov](mailto:donna.jerry@vermont.gov) and one hard copy (three-hole punched) with a Verification Under Oath to my attention at the Green Mountain Care Board, 144 State Street, Montpelier, Vermont 05602.

If you have any questions, please do not hesitate to contact me at 802-760-8162.

Sincerely,

*s/ Donna Jerry*  
Senior Health Policy Analyst  
Green Mountain Care Board

cc. Michael Barber  
General Counsel