

April 14, 2021

**Via Email and U.S. Mail**

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Re: Docket No. GMCB-009-20con, Proposed Purchase of Ambulance Services; Response to Green Mountain Care Board questions dated April 7, 2021

Dear Ms. Jerry:

On behalf of our client, WLRC Medical, Inc. (“WLRC”), I am pleased to enclose WLRC’s responses to the Green Mountain Care Board’s April 7, 2021 request for additional information, as well as a Verification Under Oath executed by WLRC’s shareholder and director.

Thank you for your review of the attached responses, and please be in touch if I can provide any additional information or answer any questions.

Sincerely,



Shannon K. Lenzini

Attachments

**WLRC MEDICAL, INC.**

**Certificate of Need Application**

**Responses to Green Mountain Care Board Supplemental Questions**

**1. Provide an overview of WLRC's staff training and protocols for transporting individuals experiencing a mental health crisis.**

When the transaction closes, WLRC Medical, Inc. (“WLRC”) will own 100% of the stock of AmCare Medical Systems, Inc. d/b/a AmCare Ambulance Service (“AmCare”). WLRC, as the sole owner of AmCare, intends to maintain AmCare’s existing training programs, which include ongoing staff training for transporting individuals experiencing a mental health crisis. AmCare collaborated with Northwest Counseling and Support Services (NCSS) to provide a 2-day Mental Health First Aid training course for its staff, and AmCare intends to, under WLRC’s ownership, continue to participate in similar trainings. AmCare will continue to follow the Vermont Statewide Emergency Medical Services Protocols, which include 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.**

AmCare does not operate under separate, company-specific medical protocols, but rather it follows the Vermont Statewide Emergency Medical Services Protocols. These statewide protocols include guidance for restraint and transporting individuals experiencing a mental health crisis, including when those individuals may also be experiencing a medical crisis. Under WLRC’s ownership, AmCare will continue to follow the Vermont Statewide Emergency Medical Services Protocols.

**3. Provide an overview of WLRC's staff training and protocols for transporting individuals with a suspected or confirmed overdose.**

WLRC will maintain AmCare’s existing training programs, including ongoing staff training for transporting individuals with a suspected or confirmed overdose. As noted above, AmCare follows the Vermont Statewide Emergency Medical Services Protocols and these protocols provide guidance for transporting individuals with a suspected or confirmed overdose. AmCare, under WLRC’s ownership, will continue to adhere to the Vermont Statewide Emergency Medical Services Protocols.

**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.**

AmCare bills private insurers in the same fashion it bills federal payers (Medicare/Medicaid). All ambulance services are billed on a base rate price which varies depending on the level of service of care provided (Specialty Care Transport, Advanced Life Support or Basic Life Support). In

addition, all payers are billed for loaded miles for the transport (miles the patient is onboard). AmCare then receives payments depending on its PAR contracts with payers, often writing off an agreed portion of the gross billing. In cases where patients have deductibles or co-pays, the deductible or co-pay amount is subtracted from commercial or federal payers, and the patient is then invoiced in accordance with their plan reimbursement. Many of these payments are received via electronic funds transfer, although some still come via paper check. All bills are accompanied by an EOB (Explanation of Benefits).

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.**

There has been no increase in reimbursements for AmCare's services, in excess of medical inflation, for any type of payer or self-pay. Additionally, there have been no 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.**

At this time there is no plan within the first three years after acquisition to secure reimbursements in excess of medical inflation for any type of payer including self-pay, for services currently provided by AmCare. In regard to insurers, WLRC does not expect to drop any providers from being in-network, and WLRC will look to expand AmCare's network umbrella and become in-network with more providers where applicable and achievable.

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 WLRC will discontinue; and any new programs, services or collaborations WLRC will add.**

WLRC will maintain and continue AmCare's current programs, including: provision of mutual aid and Paramedic Intercept services to surrounding communities in Franklin and Chittenden Counties; sponsorship of local first responder services within its communities; provision of joint training to local fire service and law enforcement agencies; provision of ambulance standby at law enforcement and fire service incidents and contact sports and community public events; collaboration with the Vermont Department of Health, the Vermont National Guard, the Franklin County Home Health Agency, county rural health clinics, area hospitals and nursing homes, area schools and educators, and Vermont residents, in providing pop-up, POD, and mobile COVID testing and vaccination. To date, AmCare has participated in the COVID PCR testing of more than 2,900, and the COVID vaccination of more than 3,000, Vermont residents. WLRC is eager to

continue and expand upon AmCare's current programs in its communities and WLRC has no plans to discontinue any of the community programs or services currently offered by AmCare.

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.**

There are no plans for any new construction or renovation to the existing garages or buildings in years 1, 2, or 3. There will be infrastructure upgrades, for example WIFI, Telephone, and Alerting System upgrades in the buildings, the costs for which upgrades are included in the provided financial projections, but no structural changes are anticipated.

9. **Once the acquisition is complete, confirm the “doing business as” (d/b/a) name that will be used for the ambulance service.**

The proposed transaction involves the sale of 100% of the stock of AmCare by its current owners, Walter and Marcella Krul, to WLRC Medical, Inc. Once the acquisition is complete, AmCare will remain AmCare, but the ownership of AmCare will have changed from being 100% owned by Walter and Marcella Krul to being 100% owned by WLRC. The corporate name "AmCare Medical Systems, Inc." and the d/b/a "AmCare Ambulance Service" will both remain the same, and AmCare will continue to operate under its same name, in its current location, just with different ownership.