

July 8, 2021

Green Mountain Care Board
114 State Street
Montpelier, VT 05620

RE: Southwestern Vermont Medical Center's general surgery services extension to bariatric services- jurisdictional determination for certificate of need.

Southwestern Vermont Medical Center's (SVMC) is exploring extending its existing general surgery service to include bariatric services and requests determination by the Green Mountain Care Board as to the jurisdictional requirement for a certificate of need (CON).

SVMC's team of 6 general surgeons will be reduced by 1.25 FTEs (full-time equivalents) through provider attrition over the next six months. An experienced general surgeon with significant training and background in bariatric surgery and management of bariatric programs has expressed interest in joining SVMC's general surgery team. Bariatric surgery conducted on complex patients reduces the subsequent total cost of care¹, and adding bariatric services to SVMC complement of general surgery services would meet a regional community need. Obesity and obesity related illnesses were identified as priorities in SVMC's most recent Community Health Needs Assessment.

Currently, the only site in Vermont providing bariatric services is the University of Vermont Medical Center (UVMCMC). Best-practice bariatric services are multifaceted, intensive programs that require multiple meetings with providers and wrap around services that provide nutrition counselling, psycho-social evaluation, life-style change management, and peer-support groups. The distance to Burlington prevents most patients in southern Vermont from accessing bariatric services at UVMCMC and prohibits all Vermonter's from benefiting from the associated health improvements.

SVMC would conduct bariatric services based upon community demand, and anticipates slow incremental growth of the program. Initial estimates suggest SVMC will exceed the minimal annual volume standards of 50 bariatric surgeries per year to maintain quality, as defined by Leapfrog's National Inpatient Surgery Expert Panel (2019).

¹ Xia et.al (2019) Bariatric surgery is a cost-saving treatment for obesity—A comprehensive meta-analysis and updated systemic review of health economic evaluations of bariatric surgery. Obesity Reviews Vol 21(1) e12932

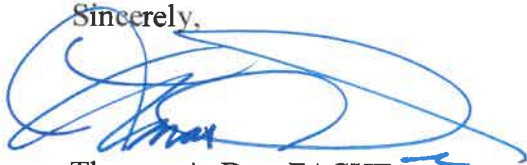
The direct expenses associated with the general surgery bariatric services will flex with volume as the allocation of provider and staff resources adjust to meet patient demand. Precisely projecting patient demand is challenging because of the current absence of bariatric services in southern Vermont and the potential for out-of-state patients to seek bariatric services at SVMC.

This program is an extension of SVMC's general surgery service and estimated expenses are projected to be less than the \$1,000,000 threshold specified by Certificate of Need regulations.

Patients in southern Vermont need access to bariatric services in order to achieve their health goals, lower health care utilization, and reduce the total cost of care. Extending SVMC's general surgery service to include bariatric services is a sensible, cost-effective approach to meet the community demand.

We look forward to the Green Mountain Care Board's jurisdictional determination.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Thomas A. Dee', with a large, sweeping flourish extending to the right.

Thomas A. Dee, FACHE
President and CEO