

DELIVERED ELECTRONICALLY

January 26, 2022

Shireen T. Hart
Primmer Piper Eggleston & Cramer PC
30 Main Street, Suite 500
Burlington, VT 05402

**RE: Docket No. GMCB-019-21con, Garnet Clinical Services, LLC Establishment of
Mobile Preventive and Urgent Care Units in Chittenden County**

Dear Ms. Shireen:

Thank you for your response to our request for annual capital costs and annual operating expenses. At this time, we request the following information:

1. Provide a detailed description of the model for your mobile service describing how and where services will be provided. Address all pertinent issues, including:
 - a. whether Garnet Clinical Services, LLC (Garnet) mobile urgent care vehicles will have a specific circuit or schedule to be at specific locations at specific times;
 - b. whether Garnet mobile urgent care vehicles will provide public access to its urgent care services at its mobile health units at all times and locations; and
 - c. how services will be provided:
 - i. whether a physician or other appropriate provider (including MD, PA, NP, RN, EMT, Paramedic) will be physically present in the vehicle to provide anticipated services or whether the physician or appropriate provider will be available to the patient remotely through telehealth.
2. In addition to the narrative requested in question #1 above, in a table format please provide:
 - a. a list of all anticipated services to be provided;
 - b. level of provider required for each service;
 - c. clinical support staff also needed for each service; and
 - d. whether each level of provider for each service is physically in the vehicle or available remotely through telehealth.



3. Explain in detail how the “physician’s office exclusion” set forth in § 9435(a) applies to Garnet’s mobile units, especially the physical place component of “the physical places that are occupied by such providers on a regular basis in which such providers perform the range of diagnostic and treatment services usually performed by such providers on an outpatient basis[.]”
4. Explain whether Garnet plans to participate in an Accountable Care Organization (ACO), the ACO(s) with which Garnet is having discussions, and the timeframe for participation. If not, please explain.
5. Identify and describe, in detail, the electronic health record system Garnet will be using in each vehicle and whether it has the capacity to receive and send medical health records to and from other providers inside and outside of the company for patients who seek care at Garnet mobile urgent care vehicles.

Please send your response to me electronically at donna.jerry@vermont.gov, and provide a three-hole punched hard copy with a Verification Under Oath to the Green Mountain Care Board, 144 State Street, Montpelier, Vermont 05602, Attention: Donna Jerry.

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

Sincerely,

s/ Donna Jerry

Donna Jerry

Senior Health Policy Analyst

cc. Laura Beliveau
Staff Attorney

