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March 22, 2022

ELECTRONIC DELIVERY

Donna Jerry
Senior Health Policy Analyst
Green Mountain Care Board
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Montpelier, VT 05602
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**RE: Docket No. GMCB-019-21con, Garnet Clinical Services, LLC
Establishment of Mobile Preventive and Urgent Care Units in Chittenden County**

Dear Ms. Jerry:

Garnet Clinical Services, LLC's ("Garnet") responds to the Green Mountain Care Board's requests dated January 26, 2022 as follows:

- 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;**

Garnet urgent care vehicles will not have a specific schedule or circuit. Mobile urgent care visits are done when medically necessary, as determined by a telehealth provider. Our mobile urgent care services are restricted to Chittenden County due to the time required to travel to patients.

- 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**

Garnet's mobile urgent care services are available to the public, but only after a telehealth triage visit (see details below).

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.**

There are two ways in which Garnet Clinical Services, LLC will provide care to patients:

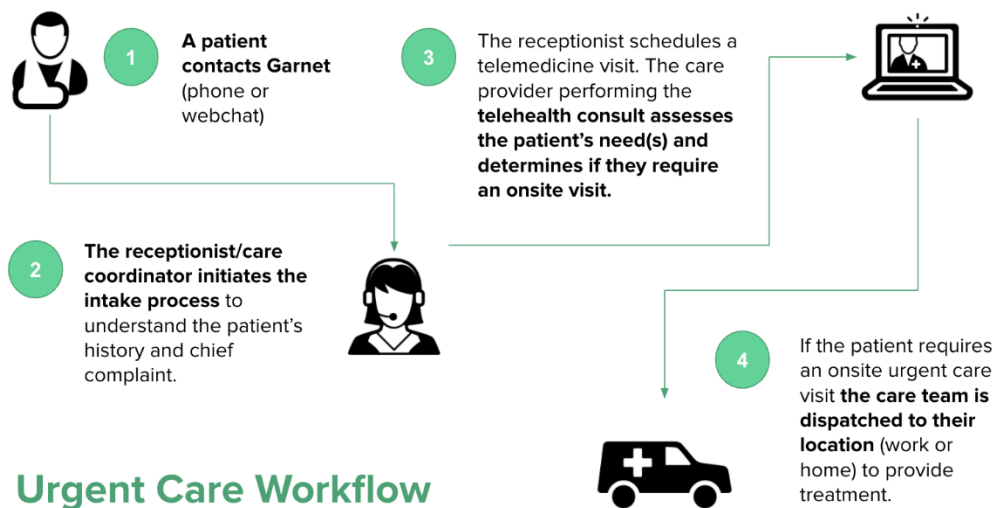
- A. Remotely, via a telemedicine visit; or
- B. Via a mobile care unit.

Vehicles

Garnet has two types of mobile care units (1) a two-exam room mobile clinic, and (2) SUVs fit up to deliver mobile urgent care. The mobile clinic will be used primarily for employer-sponsored onsite health clinics and biometric screenings, although it can also be deployed to other locations where there is a need to service a large number of patients. The mobile clinic is fit up for both primary care and urgent care needs.

Practice Workflow

- A. Urgent Care:** The workflow for Garnet’s mobile urgent care is outlined below. All patients will be seen via telemedicine first, to determine whether a mobile visit is required. Telemedicine visits will be conducted by one of our licensed providers (MD, PA or NP). Mobile care teams consist of a licensed provider and mobile medical technician (EMT, AEMT or Paramedic).



- B. Primary/Preventative Care:** The offerings will be delivered in our mobile clinic at locations where there are multiple patients to serve (e.g. employer sites). These patient appointments will be scheduled in advance and will follow the typical workflow of an

office visit in a physician practice. Providers will be MDs, PAs, or NPs, and they will be supported by EMTs, AEMTs, Paramedics or RNs.

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.

Service	Description	Provider Level	Clinical Support	Provider Location
Primary Care Clinic	Well visits, sick visits, managing chronic illness, specialist referrals, medication mgmt, POC labs	MD, PA, NP	EMT, AEMT, Paramedic, RN	Onsite (e.g. employer site)
Biometric Screenings	Vitals, labs, mental health and substance abuse screening	MD, PA, NP	EMT, AEMT, Paramedic, RN	Onsite (e.g. employer site)
Telemedicine		MD, PA, NP		Remote
Mobile Urgent Care	Non-life-threatening illnesses, minor procedures, labs, medication dispensing	MD, PA	EMT, AEMT, Paramedic	Onsite (patient's home or workplace)

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[.]”

The “physician office exclusion” applies to Garnet’s services because their professional services are furnished in the physical places that physicians and other providers have traditionally practiced medicine. The scope of the physician office exclusion is defined as “the *physical places* that are occupied by 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.

Garnet's urgent care services will be furnished in patients' homes in the same manner as physicians and other practitioners have traditionally provided as part of house calls.

In performing house calls, also referred to as home visits, physicians and other practitioners have traditionally provided diagnostic and treatment services on a *regular basis* in patients' homes. A Research Letter published in the Journal of the American Medical Association observed that a number of technological and clinical factors have led to an increase in house calls in which from 1998 to 2004, the annual number of house calls increased 43%, from 1,442,395 to 2,060,029. Stephen H. Landers, MD, et al., Trends in House Calls to Medicare Beneficiaries, 294 JAMA 2434, (Nov. 16, 2005.). In evaluating Medicare claims data, this study identified that Medicare beneficiaries receive more than 2 million house calls per year. Another study found that sixty-eight percent of primary care practices offered house calls, including eight practices that were completely mobile. Caitlyn M. Rerucha, MD, et al., House Calls, 102 American Family Physician, 211-220, (Aug. 15, 2020). Garnet's mobile urgent care visits are the same as the common and traditional house calls that occur millions of times per year, in that they occur on a regular basis in patients' homes.

Garnet's worksite primary care clinics also occur in the physical places that are occupied by providers on a regular basis. Physicians and other practitioners routinely perform professional services on behalf of employers in employers' worksites. According to a survey conducted on behalf of the National Association of Worksite Health Centers, thirty-one percent of employers with 5,000 or more employees offer worksite primary health clinics. National Association of Worksite Health Centers, Worksite Health Centers 2021 Survey Report, [https://www.nawhc.org/resources/Documents/2021-Worksite-Health-Centers-Report%20\(2\).pdf](https://www.nawhc.org/resources/Documents/2021-Worksite-Health-Centers-Report%20(2).pdf). In providing worksite primary care services and home visit urgent care, Garnet is subject to the physician office exclusion because it offers its services in the physical places that individuals routinely receive such service.

If anything, the services Garnet provides are further removed from the domain of Health Facility Planning because there is no facility to evaluate or regulate. Garnet does not have any of the infrastructure that typically necessitates a CON (imaging, etc.).

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.

Garnet plans to participate in value-based care models and has initiated conversations with two of the three Vermont-based ACOs and plans to approach all three once fully credentialed with all major public and private insurance carriers. Garnet expects to join at least one ACO by the end of 2022.

- 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.**

Garnet will use Athena as its electronic medical record. Garnet will use VITL to access patient records and will also contribute data to the HIE. Garnet will provide visit summaries to patients as well as their PCPs and specialists with patient consent.

Sincerely,

/s/ Shireen T. Hart

Shireen T. Hart