
DELIVERED ELECTRONICALLY

March 17, 2023

Deb Snell, RN CCRN
President AFT-VT Health Care
President VFNHP
AFT Vermont
96 Colchester Ave.
Burlington, VT 05401

RE: AFT-VT Request for Status as Interested Party or Amicus Curiae for Docket No. GMCB-004-23con (UVMHC Development of Outpatient Surgery Center)

Dear Ms. Snell:

Please review the following questions and file a response on or before Friday, March 24, 2023.

1. Your March 3, 2023, letter requests that AFT-VT be granted interested party status or, in the alternative, amicus curiae status. In 2021, when UVMHC applied for a conceptual certificate of need to plan the outpatient surgery center, it was the Vermont Federation of Nurses and Health Professionals (VFNHP) that requested interested party or amicus curiae status. Please clarify whether these are different organizations or the same organization and, if they are different, confirm that the request is appropriately submitted on behalf of AFT-VT.
2. In its March 3, 2023, request, AFT-VT states that it is best situated to help the Board determine “whether ... and to what extent, the project will have an adverse impact on existing facilities to provide medically necessary services to all in need, regardless of ability to pay or location of residence” (quoting GMCB Rule 4.000, § 4.402(3)(f)). Please explain how the interests AFT-VT has identified in “adequate safe staffing” and the ability to provide “safe medical care amidst worker shortages” relate to this criterion.
3. Please provide further information, with any appropriate examples and explanations, regarding whether prior large capital expenditures undertaken by UVMHC, including the Replacement of Inpatient Beds (the Miller Building), Docket No. GMCB-021-14con, have substantially and directly affected AFT-VT’s asserted interests in adequate safe staffing.



Thank you for your attention to this matter.

Sincerely,
s/ Donna Jerry

Senior Health Policy Analyst
Green Mountain Care Board

cc. Laura Beliveau, Staff Attorney, GMCB
Eric Miller, UVMMC
Eric Schultheis, Office of the Health Care Advocate

