

THE
University of Vermont
MEDICAL CENTER

By Electronic Mail & U.S. Mail

December 8, 2023

Ms. Donna Jerry
Senior Health Policy Analyst
Green Mountain Care Board
144 State Street
Montpelier, VT 05602
Donna.Jerry@vermont.gov

Re: Docket No. GMCB-004-23con, Development of Outpatient Surgery Center on Tilley Drive, Project Cost: \$129,640,703

Dear Ms. Jerry:

The University of Vermont Medical Center Inc. (“UVM Medical Center”) hereby responds to the Green Mountain Care Board’s (“Board”) Requests for Additional Information Q.007, dated November 28, 2023, regarding the above-referenced project.

- 1. Explain in detail how your project addresses the Institute of Healthcare Improvement (IHI) Triple Aims.**
 - (a) improving the individual experience of care;**
 - (b) improving health of populations;**
 - (c) reducing the per capita costs of care for populations.**

Response:

Although none of the statutory criteria or HRAP CON Standards require the applicant to specifically address the Institute of Healthcare Improvement (IHI) Triple Aims, the proposed project will serve those Aims as follows:

- (a) The proposed OSC will enhance the patient experience. Most importantly, it will enable UVM Medical Center to offer its patients timely access to the care they need at a location close to home. In addition, as detailed in the CON Application, the facility design ensures patients’ safety, convenience, and privacy, and incorporates DEI principles through the inclusion of gender-neutral bathrooms and changing areas, and private lactation spaces; and the proposed site is conveniently proximate to other UVM Medical Center outpatient clinics, and accessible by public transportation, and the site design

includes ample on-site parking. The OSC will replace outmoded outpatient surgery facilities at the Fanny Allen Campus where the operating rooms are too small to accommodate necessary equipment, and undersized preoperative and postoperative spaces restrict provider and visitor access to patients, and limit patient privacy.

- (b) As detailed in the CON Application, the proposed OSC will improve population health by enabling UVM Medical Center to offer its patients timely access to the outpatient procedures and surgeries they need at a location close to home.
- (c) As detailed in the CON Application, UVM Medical Center must expand its outpatient operating room capacity to meet its patients' need for surgeries and procedures. If UVM Medical Center does not build the OSC, some patients will experience delayed care, which is likely to increase the costs of care for those patients. When a patient cannot access the health care they need when they need it, their medical condition may worsen, and treatment costs may ultimately be higher than they would have been if the patient had received timely attention.

2. Address in detail CON STANDARD 1.4: If an application proposes services for which a higher volume of such service is positively correlated to better quality, the applicant shall show that it will be able to maintain appropriate volume for the service and that the addition of the service at the facility will not erode volume at any other Vermont facility in such a way that quality at that facility could be compromised.

Response:

CON Standard 1.4 does not apply to this Certificate of Need ("CON") application because it proposes the development of a new site of service, not "the addition of [a] service" that UVM Medical Center does not already provide. That said, UVM Medical Center responds as follows:

UVM Medical Center will maintain appropriate volume for all services provided at the proposed outpatient surgery center ("OSC") after the OSC opens. UVM Medical Center proposes to build the OSC because additional operating room capacity is needed to accommodate increasing surgery and procedure volumes. *See* CON Application at 8 – 17; Response to Board's Q.002, Q.16.

UVM Medical Center's development of the OSC will not erode volume at any other Vermont facility. As we have previously explained, most recently in response to the Board's Q.006, Q.6, UVM Medical Center's demand model for the OSC project, and therefore the size of the project, assumes that UVM Medical Center's market share of outpatient surgeries stays the same. That assumption informs the project pro forma, which does not include UVM Medical Center capturing volume from other facilities.

Thank you for your attention to UVM Medical Center's application. Please let us know if you have any further questions or need additional information.

Sincerely,

A handwritten signature in blue ink, appearing to read "Eric Miller". The signature is fluid and cursive, with a long horizontal stroke at the end.

Eric Miller
General Counsel & SVP
The University of Vermont Health Network