



December 21, 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, UVMMC Development of Outpatient Surgery Center

Dear Ms. Jerry:

Northwestern Medical Center (NMC) is reaching out as an official Interested Party in the Certificate of Need process regarding the University of Vermont Medical Center's (UVMMC's) proposed Outpatient Surgical Center (Docket No. GMCB-004-23con).

NMC continues to support the need for UVMMC to have the appropriate surgical facilities to meet the primary care surgical needs of Chittenden County and the tertiary care surgical needs of the greater region. At the same time, it is crucial to the overall Vermont healthcare system that the calculation of the size of those surgical resources be made with consideration of overall surgical capacity – both at other Chittenden County surgical facilities and at neighboring community hospitals.

Two of the Green Mountain Care Board's (GMCB) questions of August 25, 2023 (question set 6) began to speak to this:

Q6. Explain in detail whether UVMMC performed an assessment of available surgical capacity at other hospitals in or near its service area. Explain and quantify the impact the OSC may have on other community hospitals offering the same outpatient surgeries.

Q19. Explain in detail whether UVMMC explored options for an outpatient surgery center with fewer than eight to twelve ORs and identify the costs associated with other options explored.

We believe UVMMC's answers to these questions did not fully address the important impact and policy concerns at hand. As such, they prompt us to request the GMCB to ask further questions relating to these topics:

a) How have the additional, as yet unbuilt, operating rooms at the Green Mountain Surgical Center, which have been approved by the Green Mountain Care Board through a

Certificate of Need process, been factored into the calculation regarding the need for additional operating rooms within Chittenden County?

b) If the current outpatient surgical cases from Franklin County were done in the open capacity of operating rooms at Northwestern Medical Center, how much would that reduce the number of new operating rooms needing to be built in this project?

c) UVMHC says in their answer to August 25, 2023, Question 6, "Other hospitals in the region should not expect any reduction in outpatient surgeries due to the opening of the OSC." Does this confirm that UVMHC does not have a strategic intention to draw any additional surgery volume away Copley or Northwestern – whether that be in Orthopedics, General Surgery, Urology, Ophthalmology, Podiatry, etc.?

NMC strongly requests that the GNCB ask these questions of UVMHC prior to ruling the application complete. UVMHC's states in their answer to August 25, 2023 Question 19: "We did not seriously consider options that contained fewer ORs that we project will be necessary to meet patient demand." The questions above call those projections into question, and we believe may well warrant a serious consideration of options that contain fewer ORs than proposed.

Sincerely,



Peter J. Wright, FACHE
Chief Executive Officer
Northwestern Medical Center