



By US & Electronic Mail

May 23, 2024

Owen Foster, Chair
Green Mountain Care Board
144 State Street
Montpelier, Vermont 05602
owen.foster@vermont.gov

**Re: The University of Vermont Medical Center Inc.
Request for Jurisdictional Determination – Home Infusion Therapy**

Dear Chair Foster:

By way of this letter, the University of Vermont Medical Center Inc. (“UVM Medical Center”) responds to the questions of the Green Mountain Care Board (the “Board”) dated May 3, 2024. The questions are included below in bold type followed by each response.

- 1. Provide a detailed explanation of how this program will be operated, including the entity through which this new service will be offered. Will the program be operated through the UVMHN Medicare Certified Home Health Agency, which is designated to cover Chittenden and Grand Isle counties, UVMHC’s Home Infusion Therapy Department, UVMHC’s existing Home Infusion Pharmacy, or a combination thereof.**

The proposed Home Infusion Therapy Nursing Service will utilize the current UVM Medical Center Home Infusion Pharmacy¹ operational and leadership structure, with the addition of a nurse supervisor who will report to the Home Infusion Pharmacy Manager (i.e., the Pharmacist-In-Charge). The proposed service will be operated solely through UVM Medical Center’s Home Infusion Pharmacy and will be enrolled with Medicare as a Home Infusion Therapy (“HIT”) provider, independent of The UVM Health Network – Home Health & Hospice, Inc. (“UVMHN HHH”), which is enrolled with Medicare as a home health agency.

- 2. Clarify whether just RNs will be providing services in the patient’s home or whether other provider types will provide services as well. Please provide a table listing the services to be provided in the patient’s home through this program and level of provider providing each service, including pharmacists and LNAs, etc. if they will be providing services in a patient’s home.**

¹ Home Infusion Pharmacy and Home Infusion Therapy Department are terms used interchangeably by UVM Medical Center.

Please see the enclosed table on page 3 that describes the services and identifies practitioner types, i.e., registered nurses and pharmacists.

- 3. Please clarify whether this new service will be offered to individuals in the service area designated for UVMHN Medicare certified home health agency (Chittenden and Grand Isle counties) or state-wide by other Medicare certified home health agencies.**

The proposed Home Infusion Therapy Nursing Service would be offered across the state to all Vermonters, including those in Chittenden and Grand Isle counties. Whether or not UVM Medical Center delivers the proposed home infusion service to a patient will be dependent on designated agency accreditation, availability, and patient choice.

Please let us know if we can answer any further questions. Thank you for your consideration.

Sincerely,



Amanda S. Angell
Associate General Counsel
The University of Vermont Health Network

Enclosure

cc: Michael Barber
Donna Jerry
Stephen Leffler, MD

<p>Services provided by Registered Nurses</p>	<ul style="list-style-type: none"> • Infusion-related nursing services • Training and education on vascular access device (VAD) <ul style="list-style-type: none"> ○ Hand hygiene and infection control/prevention ○ VAD care and maintenance ○ VAD complications (i.e. dislodgement or occlusion) ○ Signs and symptoms of infection
<p>Services provided by Registered Nurses (in-person) or Pharmacists (remote)</p>	<ul style="list-style-type: none"> • 24/7 support • Monitoring/remote monitoring provided by a pharmacist or nurse • Communication about changes in therapy <ul style="list-style-type: none"> ○ Assessing compliance ○ Response to therapy • Patient assessment and evaluation <ul style="list-style-type: none"> ○ Adverse events and complications of infusion ○ Evaluation of caregiver support ○ Medication review ○ Review of lab results ○ Response to treatment ○ Functional limitations ○ VAD care i.e. dressing changes, lab draw • Medication and disease management <ul style="list-style-type: none"> ○ Self-monitoring instruction ○ Lifestyle and nutrition instruction ○ Education on medication, side-effects, drug interactions, adverse events, and infusion-related reactions ○ Medication safe handling ○ Collaborative development of patient centered goals ○ Pre-meds and inspection of meds prior to use