

From: LaJeunesse, Kristen <Kristen.Lajeunesse@vermont.gov>

Sent on: Wednesday, June 26, 2024 3:19:39 PM

To: LaJeunesse, Kristen <Kristen.Lajeunesse@vermont.gov>

Subject: Public Comment: Certificate of Need

A public comment has been received.

Name: Roger Brown

Town: Richmond

Affiliation:

Topic:Certificate of Need

Comment: I am glad to see UVMHN's Certificate of Need application to build an outpatient surgery center. This is exactly what the CON process is intended to judge - massive capital expenditures whose cost will be passed on to ratepayers. Put me down as a definite maybe on this. None of Dr. Leffler's points are backed up by any kind of data, particularly data on which comparisons are possible. "Must have" because "wait times" and "aging population" and "inpatient surgery is cheaper" are all nice to say because they aren't really able to be refuted. Here are the questions the GMCB would ask the hospital. First, are they doing more surgeries now than five years ago? If not, why not? The reality is that if they are seeing increasing wait times, and lower surgical numbers (while accounting for the down time from the poisonous air at Fanny Allen), then the problem is administrative rather than capacity based. Are UVMMC's operating rooms at "full capacity"? Is UVMMC doing a similar number of procedures per bed as other teaching hospitals? Because if not, then the answer needs to be better administration and organization rather than added capital costs. (Spoiler alert - improved administration doesn't cost \$130 million, but it does take more work from overpaid executives.) Second, do the "more complex" procedures Dr. Leffler suggests could be done in these \$17 million per room need to be done here in Vermont? This needs to be a continual question surrounding the procedures and departments at UVMMC. Does it make sense to provide all of the services we currently provide in Burlington, let alone add complexity? Do the costs of providing these added surgeries benefit the healthcare landscape? Or do they help administrators who want to move up in the world show that they ran a "big deal" hospital? It is important not to minimize the ordeal of patients who have to travel for medical procedures, but we are also not in horse and buggy days any more. There are, and always will be, procedures for which one needs to travel - basic statistics tell us that we cannot treat all conditions in all places. If you have a relatively rare condition, it is much better to go to a doctor who sees that condition regularly even if you have to travel. UVMMC even knows this from a financial standpoint - its why they limit procedures in hospitals they absorb and send the patients to the mothership in Burlington. Finally, and this is important, the GMCB should find out who made the decision to fight the CON for the Green Mountain Surgery Center (apparently in 2016 a surgery center wasn't a "must have") and hold them personally liable for the costs of that litigation to the people of the state of Vermont. This application makes quite clear that the fight surrounding that approval process was driven entirely by blatant protectionism and had nothing to do with actual economics or the welfare of Vermont. If the UVMMC surgery center CON is granted, condition that approval with a gag order on UVMHM executives with regards to any issues in front of the GMCB, the legislature or the executive branch, and complete bar from UVMHN lobbying any of those bodies.

Post Comment: Yes