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Dear Chair Owen Foster and Members of the Green Mountain Care Board,

I respectfully respond to the VAHHS Request for Amendment to the FY 2024 Hospital Budget Guidance.

The Hospital Association's concerns which were expressed in their request are what the entire healthcare system faces. It may be relatively new to hospitals, but the nonhospital-based businesses have a long history of being forced to manage with restrictions placed on budgets. It is not all bad to have pressure put on spending. No doubt there are hospital budget items worthy of scrutiny.

A hospital's threat of "quickly cutting services" is weak if same services are provided elsewhere at lower costs. And the idea that potential "media coverage would impact hospital reputations" reflects a fear of transparency. The public has in large part been kept in the dark up to now. Most patients have no idea how hospitals financially operate and their effect on the rest of the healthcare system.

Nowhere in the GMCB mission, vision, core duties or Title 18 Chapter 220 does it demand that the board isolate hospitals from the whole of the healthcare system in the budget regulatory duty. In multiple locations on the GMCB website, in the Vermont Statutes and Acts, there is clear reference to inclusion of all parts of the healthcare system.

Regulation of an entity does not equal "giving the entity what it asks for financially to operate its business". It is the role of the business to operate within the regulations. The absence of hospital budgets resolutely challenged has rather encouraged hospital consolidations and expansion of services which shows no evidence of quality improvements or improved operating efficiencies as once purported. Instead, there is now less competition resulting in more market share... undermining fair, competitive insurance negotiations. There is less access to affordable care options. There is less opportunity for innovation. Nothing of value for consumers comes from monopolization.

I urge the board to stay firm in your position. An allowance of 8.6% over 2 years is reasonable. What is presented in budgets can and should be challenged. Vermont healthcare system depends on the GMCB regulating hospitals not only for the health of the entire healthcare system, but sustainability of hospitals, especially rural hospitals. And if it is the largest hospital that is most opposed, I would question why.

I appreciate your thoughtful consideration.

A handwritten signature in black ink, appearing to read 'Sharon Gutwin P.T.', written in a cursive style.

Sharon Gutwin PT and Owner of the RehabGYM