

From: Sharon Gutwin PT and owner of the RehabGYM  
To: the GMCB  
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### **Comments in Response to Act 167**

The GMCB has in its mission, purpose and duties, obligations to the Vermont healthcare **system**. Nowhere in Vermont Statutes is it stated that hospitals should be given preferential consideration over any other part of the healthcare system but rather regulated to the benefit of the mission and purpose. The sustainability of hospitals cannot be considered at the sacrifice of community-based providers.

The monopolization of healthcare has created what all monopolies create – higher prices with less benefits to customers.

UVMHN monopolizes Chittenden County and much of Vermont. This monopolization has harmed the independent healthcare sector and patients.

- Using market power to capture a far greater percentage of payments from insurers leaving independent providers underpaid.
- Limiting its referrals to its own providers.
- Failing to provide patients with knowledge of options for care outside of UVMHN.
- Failing to provide patients with knowledge of their higher cost vs. cost of options outside of UVMHN.
- Failing to collaborate with independent providers in healthcare reform initiatives.

### **Solution:**

- Support hospitals fully for the care only hospitals can provide.
- Site-neutral payments for all other care.

It is not only independent providers that support site-neutral payments...

- Federal and state governments show Bi-partisan support for site-neutral payments.
- CMS supports site-neutral payments.
- MPAC supports site-neutral payments.
- All insurers support site-neutral payments.

Complexity in healthcare does not allow for effective regulation in and of itself. Allowing site-neutral payments will do a better job in reducing cost and improving quality by the very nature of competition...as a fair and open market does.

Site-neutral payments are far overdue.