

October 30, 2020

Sarah Kinsler, Director of Strategy and Operations
Green Mountain Care Board

Dear Ms. Kinsler:

On behalf of Vermont's hospitals, thank you for the opportunity to comment on the GMCB Regulatory Alignment White Paper, Part 2: Options for Regulatory Timeline and Logistics. The paper clearly lays out the regulatory issues as they stand today and offers thoughtful recommendations.

VAHHS does not support Recommendation 1, which would change the hospital fiscal year from October 1st to either a January 1st or July 1st start date. As the paper points out, changing the hospital fiscal year is operationally challenging and administratively burdensome in the best of times because hospitals would have to build two different budgets. Asking hospitals to shift to a different fiscal year during COVID-19, when there is so much financial uncertainty and administrative staff are already stretched thin, would be impossible. Furthermore, the advantages of changing the hospital fiscal year are limited, especially when coming at the end of this iteration of the All-Payer Model agreement.

Continuing current regulatory processes and allowing for data to be collected consistently year over year should create greater predictability and achieve the goals of regulatory alignment with far less disruption. Changing the process now would create a shift in current data and cause disruption instead of alignment.

As a result, VAHHS supports Recommendation 3, continue to improve communication of hospital budget impacts on QHP filings. Greater communication on the impacts of hospital budgets on QHP filings will help inform the public while allowing the GMCB to refine its regulatory processes and build predictability.

Again, thank you for the opportunity to comment. Please feel free to contact me with questions or concerns.

Sincerely,



Devon Green
Vice President, Government Relations
Vermont Association of Hospitals and Health Systems