



Representing Quality Health Care Homes

November 23, 2020

Kevin Mullin, Chairman
Green Mountain Care Board
144 State Street
Montpelier, VT 05602

Dear Chair Mullin,

Thank you for giving the Vermont Health Care Association (VHCA) the opportunity to comment on OneCare Vermont's proposed fiscal year 2021 budget. Vermont's skilled nursing facilities (SNFs) are active participants in our state's provider-led reform initiative, the All-Payer Model. Currently, 22 of our 37 SNFs are working with OneCare and its partner providers to help achieve our common goal of providing high quality affordable health care.

In 2018, OneCare launched the 3-Day SNF Rule Waiver. This waiver allows a Medicare beneficiary to be admitted to a participating SNF without completing the traditional fee-for-service qualifying hospital stay prior to admission to a SNF. Under the waiver, when a patient requires skilled nursing, he or she can be admitted directly to a SNF from a physician's office, the emergency department, from observation status in a hospital, hospital inpatient stays of fewer than three days, or the patient's home. Patients have more timely access to benefits such as physical, occupational or speech therapy without unnecessary inpatient hospitalization. This opportunity would not be available to patients without the waiver program through our ACO. In 2019, Vermont ranked 3rd nationally in utilization for this important waiver.

While the pandemic has had drastic impacts on SNFs, including utilization, VHCA members are committed in the long-term to continue their work with OneCare to identify areas for ongoing collaboration with network providers in the waiver program, as well as in efforts to reduce unnecessary re-hospitalizations and emergency room visits for the patients we serve. Vermont's SNFs recognize the value of this ongoing and complex effort to improve care coordination and service delivery. OneCare has an important role in facilitating this initiative, and VHCA supports its ongoing work.

Sincerely,

A handwritten signature in black ink, appearing to read "Diane L. Sullivan".

Diane L. Sullivan
President, Vermont Healthcare Association
Administrator, Pine Heights at Brattleboro