

THE
University of Vermont
HEALTH NETWORK

March 25, 2022

Green Mountain Care Board
c/o The Honorable Kevin Mullin, Chair
144 State Street
Montpelier, VT 05602
Kevin.Mullin@Vermont.gov

Dear Members of the Green Mountain Care Board,

On behalf of the University of Vermont Health Network (the “Network”), I am writing to support the consideration you are giving to increasing the Certificate of Need (CON) thresholds, pursuant to 18 V.S.A. § 9434, and to encourage you to use the authority granted by Vermont statute to annually increase those thresholds by the maximum allowable amount.

As we work to increase access to health care services for Vermonters across our Network and across the spectrum of care we offer, we must find opportunities to reduce barriers to innovation and swift action. Our desire to limit barriers is now confronted by record inflation. Recent reports peg inflation at the highest rate (7.9% year over year) since 1982. These inflationary increases are leading to higher costs for goods and services, effectively shrinking our ability to make necessary investments in equipment and services under the current, non-adjusted CON threshold.

Thank you for your consideration to increase the CON thresholds by the maximum allowable amount, and please do not hesitate to be in touch should you have any questions about our recommendations.

Sincerely,



Eric Miller
General Counsel and Senior Vice President

Cc: Michael Barber, General Counsel