



Representing Quality Health Care Homes

December 16, 2022

Owen Foster, Chairman
Green Mountain Care Board
144 State Street
Montpelier, VT 05602

Dear Chair Foster,

Thank you for giving the Vermont Health Care Association (VHCA) the opportunity to comment on OneCare Vermont's proposed fiscal year 2023 budget. Vermont's skilled nursing facilities (SNFs) are active participants in our state's provider-led reform initiative, the All-Payer Model. Currently, twenty-one of our 38 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, they 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.

Most recently VHCA has been partnering with OneCare to address the critical physician needs within our SNFs. Dr. Carrie Wulfman has been integral in assisting us to identify both short- and long-term strategies to fill the gaps in need for medical directors and physician coverage for patients. Dr. Wulfman has facilitated cross-provider partnerships and assisted in coordination with the Agency of Human Services and others to help us design several pilot programs for testing new models of service delivery within SNFs. Dr. Wulfman's experience as both a SNF medical director and a physician serving nursing home residents over many years, has been invaluable as we navigate this crisis. We hope these efforts will help to improve access and quality of care, reducing unnecessary re-hospitalizations and emergency room visits. Vermont's SNFs recognize the value of OneCare's partnership in facilitating these important initiatives. VHCA supports the ongoing work of OneCare Vermont.

Sincerely,

A handwritten signature in black ink, appearing to read "Helen Labun", with a long, sweeping underline.

Helen Labun
Executive Director, Vermont Health Care Association