

**Green Mountain Care Board**  
89 Main Street  
Montpelier, VT 05620

[phone] 802-828-2177  
www.gmcboard.vermont.gov

*Cornelius Hogan  
Jessica Holmes, PhD  
Robin Lunge, JD, MHCDS  
Susan Barrett, JD, Executive Director*

## **DELIVERED ELECTRONICALLY**

March 17, 2017

Eileen Elliott, Esq.  
Dunkiel Saunders Elliott Raubvogel & Hand, PLLC  
91 College Street PO Box 545  
Burlington, VT 05402-0545

### **Re: Docket No. GMCB-010-15con, Proposed Ambulatory Surgery Center.**

Dear Eileen:

After receiving notice from the Board that the above-referenced CON was closed and a hearing has been scheduled, your office contacted me regarding the Board's request that you provide further explanation regarding the project's compliance with the Facility Guidelines Institute (FGI) Update Series (September 2014).

As background, our consulting architect initially indicated that the procedure rooms and other areas did not appear compliant with the updated guidelines. On reexamination, however, we were advised that the rooms may comply with the guidelines, but that the Board should obtain additional information regarding the following areas:

- Confirm that "invasive procedures" per the FGI Guidelines definition, are not being performed in the procedure rooms.
- Per FGI Guideline 3.9 for Endoscopy facilities, clarify whether the areas labeled as "Decon" and "Clean" are "Instrument Processing Rooms" or "Flash Sterilization Rooms." If they are "Instrument Processing Rooms," indicate where the countertop is located with space for the equipment (Section 3.9-5.1.3.1(1)), where storage is located (Section 3.9-5.1.3.1(3)), and where clean endoscopes will be stored (Section 3.9-5.1.3.3).
- Explain where the clean supply room is located relative to the operating rooms. (Section 3.7-3.6.9).
- Identify the dimensions of all beds in the Pre- and Post-Op area, their clearances and relationship to adjacent beds/partitions (Section 3.7-3.4.2.2 and 3.7-3.4.3.1(2)).
- Identify the location of the Emergency Equipment storage. (Section 3.1-3.6.11.4).



If you have any questions, please do not hesitate to contact me at 802-828-2918.

Sincerely,

s/ Donna Jerry

Donna Jerry

Senior Health Policy Analyst

cc. The Office of the Health Care Advocate  
Anne Cramer for the Vermont Association of Hospitals and Health Systems  
Northwestern Medical Center

