



5. Please provide further detail about how the GMSC will make its prices available to the public. You state in Exhibit 2.a that your charity care policy will be posted on your website. Will all prices and policies related to payment be posted visibly on the GMSC website? If not, how will they be made available to potential patients?
6. CON STANDARD 3.16 states that “An Applicant proposing to establish an ambulatory surgical center shall demonstrate how the applicant will provide access to all residents of each community within the identified service area without regard to individuals’ payer type, insurance status or ability to pay for necessary services.” In your statement regarding consistency with this standard on page 54 of the application, you state that “The proposed Center is committed to providing free and discounted care to needy patients at a level that is on par with Vermont non-profit hospitals.”

The Affordable Care Act added new standards for nonprofit hospitals’ billing practices including guidelines for financial assistance, billing, charges, and collections. The Internal Revenue Service and the Treasury Department issued final regulations in December 2014, which hospitals must comply with by January 2016.<sup>3</sup> Please state whether or not you plan to adhere to these standards. If you do, please provide additional detail on how you plan to implement them. If not, please explain which provisions you do not plan to implement and your reasons why.

7. Will patients have the opportunity to apply for free or discounted care prior to receiving care at the GMSC? If yes, please provide additional detail about the process for doing so.
8. CON STANDARD 1.10 states that “Applicants proposing new health care projects requiring construction... shall show that Efficiency Vermont, or an organization with similar expertise, has been consulted on the proposal.”

Please provide more detail about your energy efficiency plans for this project, including the level of LEED certification you intend to obtain and your expected costs and returns for investment in efficiency measures.

9. Please provide a detailed explanation of the GMSC’s credentialing process, referenced on page 71 of the application.
10. Please provide detailed information about the payer mix for each physician who plans to operate at the GMSC. Specifically, please note whether the physician continuously accepts new Medicaid patients, has a cap or quota on the number of

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<sup>3</sup> Department of the Treasury and the Internal Revenue Service, *Additional Requirements for Charitable Hospitals; Community Health Needs Assessments for Charitable Hospitals; Requirement of a Section 4959 Excise Tax Return and Time for Filing the Return*, 79 Fed. Reg. 78954, available at <https://federalregister.gov/a/2014-30525>

Medicaid patients allowed in his or her practice at a given time, or does not see any Medicaid patients.

11. Please describe the discussions you have had to date with UVM Medical Center regarding a transfer agreement.
12. Please explain in further detail the ways in which you determined that two operating rooms and four procedure rooms is the appropriate size for the GMSC.
13. Will the GMSC use the same Electronic Health Record (EHR) as UVM Medical Center? If not, will the GMSC's EHR be compatible and able to communicate with UVM Medical Center's EHR and the EHRs of other area hospitals?

Dated at Montpelier, Vermont this 31<sup>st</sup> day of July, 2015.

s/ Julia Shaw  
Julia Shaw  
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#### CERTIFICATE OF SERVICE

I, Julia Shaw, hereby certify that I have served the above Proposed Questions for the Applicant on Michael N. Donofrio, General Counsel to the Green Mountain Care Board; Judith Henkin, Health Policy Director of the Green Mountain Care Board, Donna Jerry, Green Mountain Care Board Health Policy Analyst and Drew Kervick and Eileen Elliott, representatives of ACTD LLC, by electronic mail, return receipt requested this 31<sup>st</sup> day of July, 2015.

s/ Julia Shaw  
Julia Shaw  
Office of the Health Care Advocate

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