

Porter Medical Center, Inc.

Middlebury, VT 05753 • (802) 388-4701

January 16, 2017

Donna Jerry, Health Policy Analyst
Green Mountain Care Board
89 Main Street
Montpelier, VT 05620

Re: Letter of Jurisdictional Determination for proposed Porter Hospital "Express Care" Service

Dear Donna,

As the GMCB is aware, patients in Porter Hospital's service area have experienced difficulty in accessing primary care services this past year. In order to improve access, Porter plans to offer unscheduled, extended hour primary care services at the hospital in order to provide an appropriate alternative site of care for non-emergent medical needs with a more convenient and expanded schedule than our current primary care practices.

This "Express Care" service will be available 7-days a week and will include evening hours for the convenience of our patients. It will be located within existing hospital space which will be renovated for this purpose at a total capital cost of \$435,000. Additional expense for normal physician office related diagnostic and other equipment to be purchased will total \$50,000 for a total project cost of \$485,000.

Any necessary imaging services (CT/MRI) will be ordered and provided through existing hospital equipment within our current facilities consistent with the practice of our primary care physicians. We are seeking a letter confirming that our plans to open an Express Care service is not subject to CON jurisdiction as it is simply opening unscheduled, extended hour primary care service at the hospital.

Ownership

The proposed "Express Care" service will function as a department of Porter Hospital.

Billing Structures to be Used

Services will be billed in a manner that is consistent with existing Porter Hospital service lines. The Place of Service Code "POS" will be coded as a 20 (Urgent Care Facility).

Claims will be submitted electronically to the extent possible utilizing, when appropriate, a UB-04 and CMS 1500 form.

Staffing

Porter "Express Care" will use both physicians and mid-level practitioners in one or more of the following primary care disciplines:

- Family Medicine
- Internal Medicine
- Emergency Medicine

Examples of Procedures to be performed

Porter "Express Care" will offer a wide array of primary care services routinely offered in its traditional primary care office settings to include:

- Acute, unscheduled care at the patient's convenience
- Ear pain, common colds, sinus infections, urinary tract infections, lacerations and sutures, minor injuries and skeletal pain, concussions, sports injuries, diarrhea
- Point of care testing for flu, urine, mono, strep throat, blood sugar and others
- Arrange laboratory studies, x-rays, and referrals to specialists when needed

Diagnostic and Other Equipment to be Purchased

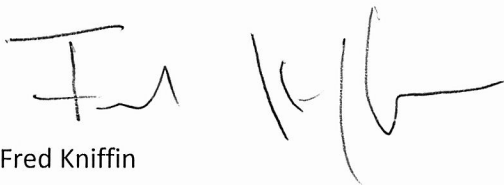
The total equipment budget is \$50,000 with the largest single item being the casework for the examination rooms (\$11,000). The remainder is an assortment of routine clinical equipment generally used in any primary care office location.

Schedule (Access)

Porter "Express Care" will be open 7-days a week with extended evening hours to enhance access to care for patients who do not require the services of our Emergency Department and/or cannot obtain an appointment to see their regular primary care provider in a timely manner (or who do not have a local primary care provider).

We believe that this initiative represents an evolution and enhancement of our current services and would not require a Certificate of Need, however, we felt that it was prudent to send this information to you in advance to obtain your official determination. Thank you in advance for your assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "Fred Kniffin". The signature is written in a cursive style with a large initial "F" and a long horizontal stroke at the end.

Dr. Fred Kniffin
President and CEO