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November 16, 2022

Mr. Owen Foster
Chair
Green Mountain Care Board
144 State Street
Montpelier, VT 05602

Dear Chair Foster:

We want to thank you and the Board for inviting us to share the challenges faced by federally qualified health centers (FQHCs) and their role in the Vermont primary care landscape. In response to your question about how the Board can support primary care, we offer four recommendations.

First, primary care practices provide high quality jobs in many communities. As the Board considers next year's commercial rates, we ask them to keep rates affordable for small businesses like ours. Vermont's FQHCs provide medical care, oral health, mental health, and substance use disorder treatment services to one-third of Vermonters regardless of their ability to pay or insurance status. We serve a critical role in improving population health and slowing the rise in the cost of health care.¹ As employers, we are vulnerable to the impact of increasing health care premiums, which puts pressure on our ability to continue to provide this valuable care.

Second, as the state plans for the next iteration of the all-payer model, we ask the Board to ensure any ACO or similar entity provide funding streams to primary care that are consistent, predictable, transparent, and sustained. Nine out of the eleven FQHCs in Vermont participate in OneCare Vermont's ACO programs. Through this participation, health centers receive vital care coordination and staffing funding. Stability in this funding is important for maintaining services and access.

Third, under the Board's authority to approve the state's health care workforce development strategy, we request actionable approaches to increase available workforce for primary care across all positions, clinical and non-clinical. Specific approaches should include but not be limited to guaranteed loan repayment and scholarships, expansion of health service education and training programs, and creation of tax and mortgage incentives for those providing care to historically underserved populations. These

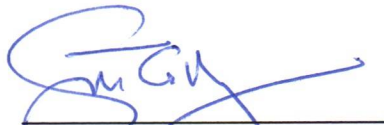
¹ National Academies of Sciences, Engineering, and Medicine 2021. Implementing High-Quality Primary Care: Rebuilding the Foundation of Health Care. Washington, DC: The National Academies Press.
<https://doi.org/10.17226/25983>.

actions will help health care organizations retain current staff who hold valuable institutional knowledge while providing needed new health care workers. Health centers lack the ability to match salaries and bonuses offered by larger employers. Expanding the available workforce will decrease the pressure on health care organizations to compete among themselves for limited workforce resources. Growing the workforce will improve Vermonters' access to timely care in the most appropriate setting, thereby reducing needs for costly emergency and critical care.

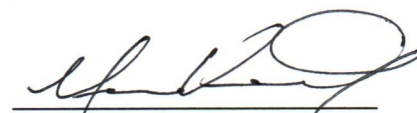
Finally, Vermont needs a value-based payment system that ensures cost saving preventative primary care reaches all Vermonters. Bi-State and its members want to collaborate with the Board and the Agency of Human Services to ensure access to care, availability of services, and cost containment. The Board's regulatory decision-making authority has tremendous impact on primary care's ability to survive. Please continue to make decisions that promote our ability to meet patient and community needs. The primary and preventive care provided by us allows the success of value-based payments for hospitals and other more acute and critical care settings.

Thank you and the entire Board for your commitment to the well-being of all Vermonters and for your attention to primary care. We look forward to working with you to ensure Vermont's healthy future.


Sincerely,



Stuart G. May
Chief Executive Officer
Lamoille Health Partners



Melissa Volansky, MD
Chief Medical Officer
Lamoille Health Partners



Mary Kate Mohlman, PhD, MS
Director Vermont Public Policy
Bi-State Primary Care Association