

August 27, 2019

To AHS Medicaid Policy Unit:

Vermont Care Partners supports DHVA's request to amend Vermont's Global Commitment to Health for the [SMI/SED Demonstration Opportunity](#).

Vermont Care Partners' agencies provide a wide array of comprehensive community-based mental health services that range from prevention to acute crisis care. We have been working closely with our state partners on mental health payment reform, increased care coordination activities, and new integration models in order to continue to enhance mental health resources for Vermonters. It is important for the mental health of Vermonters that the community based system is maintained and strengthened while ensuring that we are increasing access, improving care, and containing costs. The Maintenance of Effort component of this amendment reflects a commitment by the state that high-quality care and recovery are best achieved when the entire continuum of care is adequately funded.

Vermont's mental health system continues to be a values-driven system in which we work hard to ensure that no Vermonter is hospitalized or institutionalized longer than is clinically indicated. Vermont is also committed to ensuring that mental health resources, such as inpatient, crisis, and residential beds, are available regionally to promote continuity of care with community-based providers. The inpatient resources that currently exist, including the Brattleboro Retreat and the Vermont Psychiatric Care Hospital, are essential components of our statewide system of care. Furthermore, as the only inpatient hospital for children/youth in the state, the Brattleboro Retreat is a crucial care setting to Vermont families. We would be very concerned if, in the absence of this demonstration opportunity, IMD restrictions led to decreased inpatient bed capacity for children, youth, or adults in the state.

We look forward to continuing to work together with our state and service delivery partners to provide high quality care that is underpinned by a robust community mental health system.

Sincerely,



Lorna Mattern and Todd Bauman, Board Presidents
Vermont Care Partners

August 29, 2019

Ashley Berliner, Director
AHS Medicaid Policy Unit
280 State Drive, Center Building
Waterbury, VT 05671-1000

Dear Ms. Berliner:

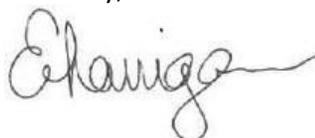
On behalf of the Vermont Association of Hospitals and Health Systems, we appreciate the opportunity to comment on the *Section 1115(a) Demonstration Amendment Request to CMS* regarding the request for an SMI/SED Demonstration. We are encouraged by the direction and commitment of CMS to provide a mechanism for reimbursement that emphasizes access and quality of services while giving IMDs the flexibility to provide treatment-focused care. Vermont's IMDs, especially the Brattleboro Retreat, are essential to maintaining and improving access to mental health services in Vermont. Without them, our entire mental health system of care and the well-being of all Vermonters is at risk.

As you know, our IMDs meet many—if not all—the same requirements as non-IMD hospitals for providing psychiatric care. Vermont's IMDs are licensed by the State of Vermont; maintain Medicare certification; are subject to unannounced regulatory visits; take part in Medicaid utilization review; and are accredited by the Joint Commission as facilities meeting the highest national standards for safety, quality of care, and commitment to continually improving patient care quality institutions.

These regulatory distinctions reflect Vermont's commitment to ensure that all of its hospitals, including IMDs, provide care that is treatment-focused. These expectations are one of many reasons why Vermont's IMDs are achieving a statewide average length of stay of less than 30 days. We are grateful that this waiver opportunity provides flexibility on length of stay. While an overwhelming majority of psychiatric hospitalizations across all inpatient settings resolve in one week or less, inpatient treatment needs to continue as long as medically necessary to ensure successful transition to the community and to reduce the risk of suicide. Allowing flexibility in this process and preserving the existing inpatient capacity in IMDs will be important in delivering good outcomes for Vermonters.

Thank you for pursuing this opportunity and we look forward to engaging in next steps.

Sincerely,



Emma Harrigan
Director of Policy Analysis and Development
Vermont Association of Hospitals and Health Systems