



**State of Vermont**

Department of Mental Health  
280 State Drive, NOB 2 North  
Waterbury, VT 05671-2010  
<http://mentalhealth.vermont.gov/>

*Agency of Human Services*

[phone] 802-241-0090  
[fax] 802-241-0100  
[tty] 800-253-0191

March 5<sup>th</sup>, 2020

Donna Jerry, Senior Health Policy Analyst  
Green Mountain Care Board  
114 Main Street  
Montpelier, Vermont 05602

Re: Silver Pines CON Application  
Docket No: GMCB-016-19con

Dear Ms. Jerry:

Thank you for giving the Department of Mental Health (DMH) the opportunity to provide comments and questions related to the Silver Pines CON application. Policy input and guidance on mental health matters is within the statutory role of DMH. We have a responsibility to “establish the general policy and execute the programs and services of the State concerning mental health.”<sup>1</sup> We also have a responsibility to “ensure equal access to appropriate mental health care in a manner equivalent to other aspects of health care as part of an integrated, holistic system of care.”<sup>2</sup>

As outlined below, we do have concerns about the CON application, specifically regarding the anticipated increase in utilization of local medical and psychiatric emergency department and inpatient services by non-Vermonters. Given that 90% of admissions to Silver Pines will be from out-of-state, Silver Pines has projected that by year three, 25 non-Vermonters will require local EMS and hospital services due to an acute medical or psychiatric conditions, and 8.3 will need inpatient psychiatric care at Vermont facilities.

	Year 1	Year 2	Year 3
<b>Non-Residents</b>	3.3 people	6.0 people	<b>8.3 people</b>

Table 1: Projected number of individuals at Silver Pines who will be referred for admission to a Vermont in-patient psychiatric care facility<sup>3</sup>

	Year 1	Year 2	Year 3
<b>Non-Residents</b>	10 people	18 people	<b>25 people</b>

Table 2: Projected number of individuals at Silver Pines who will require local EMS and hospital services due to an acute medical or psychiatric condition<sup>4</sup>

These non-resident individuals requiring emergency department and inpatient treatment would bring an unexpected burden to not only the local ED, Copley Hospital in Morrisville, but also for our inpatient psychiatric system. The State of Vermont has experienced a dramatic increase in ED mental health bed days, resulting in year-over-year long ED wait times.

<sup>1</sup> 18 V.S.A. § 7201(a)

<sup>2</sup> 18 V.S.A. § 7201(b)

<sup>3</sup> Silver Pines CON Responses to GMCB Questions, 2/20/2020

<sup>4</sup> Silver Pines CON Responses to GMCB Questions, 2/20/2020

We have significant concerns about this project as outlined. Even small increases in ED and inpatient psychiatric bed utilization will further overwhelm our system, resulting in longer ED wait times and lower inpatient psychiatric bed availability for Vermonters. Additionally, we share the concerns noted by the Division of Alcohol and Drug Abuse Programs in their response dated February 20<sup>th</sup>, 2020.

Sincerely,

Sarah Squirrell  
Commissioner, Department of Mental Health