Green Mountain Care Board 144 State Street Montpelier, VT 05601 June 2, 2020

Re: Southwestern Vermont Medical Center Emergency Department renovation CON Docket No. GMCB-019-19con

To the Green Mountain Care Board:

The purpose of this public comment is to highlight several key features within the SVMC emergency department renovations and to express our support for the SVMC Certificate of Need application. The three of us were actively involved with the CVMC inpatient psychiatric expansion and ED redesign that the UVM Health Network lead last year. We have been appreciative of the fact that Southwestern Vermont Medical Center reached out to persons with lived experience of the use of emergency rooms in such a crisis, including us, to share its plans for renovations at its hospital. The work we did at CVMC prepared us to review the SVMC emergency department redesign.

We believe that the design plan described in its Certificate of Need application will allow SVMC to serve Vermonters in crisis in a respectful and trauma-informed manner that meets the standards for state-of-the-art care and that "will support equal access to appropriate mental health care that meets standards of quality, access, and affordability equivalent to other components of health care as part of an integrated, holistic system of care, as appropriate." (CON criteria 9)

The following list identifies several important features of the design.

- The entry and triage area allow for nondiscriminatory assessment of patient needs for different types and levels of emergency care based upon individual health presentation. The strategic location of the ambulance bay allows for direct entry to critical care for medical, physical, or psychiatric needs.
- 2. The care area for those whose emergent health need is primarily psychiatric meets key standards. The important common peer support room is open and in a direct sight line with the team station. By placing it in the psychiatric suite between a grouping of rooms that are always unlocked, and a smaller 2-room area that can be secured if necessary, SVMC has maximized the ability for all patients to access the common areas. The use of brief delayed-release doors ensures that voluntary patients can always exit freely, yet allows time for staff to intervene and re-direct a patient who is in involuntary status while retaining their access to the common area.
- 3. We were impressed with this thoughtful and creative approach that thus ensures both that voluntary patients would never be held in a locked area in ways contrary to state law, yet that also allows for necessary safety measures when needed to address situations when a person is, or becomes, an individual in the custody of the state as a result of an immediate risk of harm to themselves or others, the inability to use a less restrictive means, and a refusal to accept voluntary care.
- 4. The flexibility of the area also assures the ability to safety meet the needs of children. In all, the creativity of the design exceeds those of other hospitals where we have collaborated in positive outcomes, because SVMC has developed approaches that improve upon achieving the goals of those other efforts.

SVMC has also expressed the intent to continue to engage with interested persons when design detail reaches the "fit-up" stage where further refinements that support patient needs will be developed.

We express our support for approval of the CON application as it pertains to the design of specialized care for the health care and emotional support needs of those in a mental health crisis such that it will "support equal access to appropriate mental health care" and will meet "standards of quality, access, and affordability equivalent to other components of health care."

Sincerely,

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