House Health Care proposed further amendments in these two sections:

Section 4:

We support the proposed waiver of the conceptual CON for the UVM/CVMC project. However, we thought that there should be several conditions that align with what a CCON would usually provide:

- 1. "Consults with the Secretary of Human Services in identifying the appropriate number and type of additional inpatient beds needed in the State." In terms of the role of a CCON in identifying need for the project, UVMHS should be consulting with AHS on the overall scope of the number and types of beds needed. The bill already requires AHS to work with UVMHS on this, so this is the counterpart.
- 2. "Ensures that the planning process for designing its proposed expansion of inpatient psychiatric bed capacity at the Central Vermont Medical Center campus includes broad stakeholder input, including from patients and providers." The CCON process provides for interested parties, so we don't want to appear to be cutting out stakeholder voices by giving the waiver.
- 3. "Works with the Green Mountain Care Board for ongoing oversight of expenditures." A CCON protects fiscal responsibility in the planning. This is already covered by the role of the GMCB in monitoring the expenditures related to the excess revenues; this simply memorializes it.

UVM was in full agreement with adding these 3 items.

Second:

In Sec. 9, the third sentence, in which the House required development of a vision statement on how to fully integrate with the rest of health care, and which was revised to review whether the plan was aligned with existing principles, we propose to return to "vision" language but to only require that it be "working towards" articulating it, and making it clearer that it is about integration with health care, not about specific current DMH policies:

"The evaluation process shall include such stakeholder involvement in working toward an articulation of a common, long-term vision of full integration of mental health services within a comprehensive and holistic health care system." ["such" stakeholder is a reference to the previous sentence that identifies stakeholders]

Anne Donahue