

# HUSCH BLACKWELL

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February 29, 2024

## VIA E-MAIL

Stephen Davis, Director  
Division of Health Care Facility Licensure and  
Certification  
Department of Public Health  
67 Forest Street  
Marlborough, MA 01752

Re: St. Anne's Hospital, Closure of Geriatric Psychiatric Unit - Response Plan

Dear Mr. Davis:

This letter is submitted on behalf of Steward Health Care System LLC, which owns and operates St. Anne's Hospital located at 795 Middle Street, Fall River, MA 02721 (the "Hospital"), and its geriatric psychiatry satellite unit, located at 150 York Street, Stoughton, MA 02072 (the "Unit"). In response to the Department of Public Health's Essential Services Finding letter dated February 15, 2024, and pursuant to 105 CMR 130.122(F), the Hospital presents the following response plan detailing how access to inpatient geriatric psychiatric services will be maintained for the residents of the Unit's service area.

### **(1) Information on utilization of the services prior to proposed closure**

The Unit opened in 2014 and was licensed for 15<sup>1</sup> geriatric psychiatric inpatient beds. The last patient was discharged on October 22, 2021, due to staffing challenges exacerbated by the COVID-19 Pandemic. The Hospital was unable to maintain adequate permanent staffing for the Unit, and it has not been utilized since November 2021.

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<sup>1</sup> Due to a typographical error, the 120-day and 90-day letters state the Unit is licensed for 16 geriatric psychiatric inpatient beds.

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**(2) Information on the location and service capacity of alternative delivery sites. Include an explanation of the basis for the Hospital's determination that the alternative delivery sites *do or do not* have the capacity (necessary space, resources, etc.) to handle the increased patient volume at the identified sites. To support that assertion, please provide the following specific details:**

**(a) Current utilization at these alternative sites**

The geriatric psychiatry services at the Unit have not been utilized since November 2021. Patients have and continue to seek geriatric psychiatry treatment at numerous available alternative facilities. Figure 1 lists utilization at the two alternative facilities in closest proximity to the Unit.

**Figure 1**

Facility Name	Utilization <sup>2</sup>	Number of Licensed Geriatric Psychiatric Inpatient Beds <sup>3 4</sup>	Approximate Distance (miles) from the Unit
Carney Hospital	70%	16	11.3
St. Elizabeth's Medical Center at Carney Hospital (SEMC)	64%	15	11.3

As demonstrated in Figure 1, Carney Hospital and SEMC have capacity to provide geriatric psychiatry services to the patient community. It is anticipated that patients will continue to seek treatment at these and other locations, as they have been since the Unit discontinued in November 2021. Figure 2 lists additional alternative facilities that offer inpatient geriatric psychiatry services.

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<sup>2</sup> Calculated for 2023.

<sup>3</sup> According to the Department of Mental Health as of 12/13/2023.

<sup>4</sup> There are an additional 152 beds available within 90 minutes of the Unit.

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**Figure 2**

<b>Alternative Facilities in Massachusetts</b>	<b>Licensed Geriatric Psychiatric Inpatient Beds</b>	<b>Approximate Distance from the Unit</b>	<b>Average Driving Time<sup>5</sup></b>
Morton Hospital	19	23.2	34
McLean Hospital	36	29.3	37 minutes
Mt. Auburn Hospital	15	29.1	39 minutes
MetroWest Medical Center	24	28.9	41 minutes
CHA Everett Hospital	22	25.6	43 minutes
Lawrence Memorial Hospital	34	26.4	44 minutes
Pembroke Hospital	19	26.4	40 minutes
Saint Anne's Hospital	16	36.5	45 minutes
South Coast Behavioral Health	24	42	46 minutes
Beth Israel Lahey Health – Plymouth	24	41.9	51 minutes

## **(b) Type of services available at the alternative sites**

The facilities listed in Figures 1 and 2 contain comparable services to the Unit. Carney Hospital's inpatient behavioral health services includes geriatric psychiatry services and operates under a multidisciplinary team approach where patient treatment is focused on diagnostic assessment, reduction of acute symptoms and development of an aftercare plan. SEMC offers a geriatric psychiatry program with an array of therapeutic activities that includes pet therapy, music therapy, and other groups that are aimed at preserving function and optimizing patient well-being. Acute behavioral health conditions treated include dementia, depression, anxiety, bipolar illness, and psychotic disorders.

## **(c) Type of medical diagnoses accepted**

Carney Hospital and SEMC accept a range of medical diagnoses that includes: Neurocognitive Disorders (Dementia), Bipolar Disorders, Schizophrenia Disorder, Schizoaffective Disorder, Major Depressive Disorders, Mood Disorders, and Psychotic Disorders. Facilities listed in Figure

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<sup>5</sup> Calculated using Google Maps.

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2 offer comparable services to SEMC and Carney Hospital. The other alternative sites offer treatment for substantially the same diagnoses.

## **(d) Adequacy of space and resources at the alternative sites**

As illustrated in Figures 1 and 2, there are twelve (12) alternative sites with a total of 264 beds within 51 minutes of the Unit that offer geriatric psychiatry services. Within 11.3 miles of the Unit, patients can go to Carney Hospital, which has 16 beds operating at 70% capacity. Within 23.7 miles, patients can go to SEMC, which has 15 beds and is operating at 64% capacity. Since the Unit has not been utilized by patients since November 2021, the formal closure of the Unit will not create additional volume or patient demand at these alternative sites.

## **(3) Travel times to alternative service delivery sites, for both peak and non-peak travel times, and an explanation as to the source for this information or what these estimates are based on**

The following represents the distance and approximate peak and non-peak time to three alternate sites from the Unit. Travel times were calculated using the Google Maps application.

<b>Hospital</b>	<b>Address</b>	<b>City</b>	<b>Peak (minutes)</b>	<b>Non-Peak (minutes)</b>
Carney Hospital	2100 Dorchester Avenue	Dorchester	24	23
SEMC	2100 Dorchester Avenue	Dorchester	24	23

Ambulance travel times are significantly less than patient travel times, therefore patients calling 911 for emergency medical services from home or to be transferred will face shorter travel time.

## **(4) An assessment of transportation needs post discontinuance and a plan for meeting those needs**

There have been no transportation issues in the over two-year period since the Unit discontinued services in November 2021. In an emergency, any patient may call 911 and be transported by ambulance to an appropriate facility.

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**(5) A protocol that details mechanisms to maintain continuity of care for current patients of the discontinued service**

As mentioned above, the last patient was discharged on October 22, 2021. Consequently, there are no current patients who need to maintain continuity of care.

**(6) A protocol that describes how patients in the Hospital's service area will access the services at alternative delivery sites. The protocol should specifically address the following:**

**(a) The process that will be employed to effectively refer patients to other facilities or providers**

As discussed, the Unit has not been utilized since the last patient was discharged on October 22, 2021. Steward Health Care System LLC has a centralized established admission access center located in Westwood, Massachusetts. Staff at this center coordinated appropriate referrals and placements to alternative facilities and engaged the state and insurance companies as needed to support appropriate placement. The center also engages the Department of Mental Health's expedited inpatient admission process for patients boarding for greater than 48 hours.

**(b) The impact that this may have on the current occupancy rates at alternative delivery sites**

As demonstrated in Figure 1 above, the Unit is aware that there is capacity at Carney and SEMC for additional patients needing inpatient geriatric psychiatric care. The formal closure of the Unit will not create additional volume or patient demand at these or any other alternative sites because there are no current patients at the Unit who will need care elsewhere.

**(c) The ability of the alternative delivery sites to meet the needs of these patients**

The formal closure of the Unit will not create additional volume or patient demand at these or any other alternative sites because there are no current patients at the Unit who will need care elsewhere. However, were there any additional demand, as demonstrated in Figures 1 and 2, there are sufficient alternative sites with capacity and resources to handle any additional patient volume. Additionally, the alternative sites offer comparable treatment as discussed in Section 1(c).

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**(d) Other alternatives if medical needs cannot be accommodated at the proposed alternative sites**

The formal closure of the Unit will not create additional volume or patient demand that will need to be accommodated at the alternative sites because there are no current patients at the Unit who will need care elsewhere.

Thank you for your attention to this matter. If you have any questions, please feel free to contact me.

Sincerely,

HUSCH BLACKWELL LLP



Rebecca Rodman

cc: J. Bernice, DPH  
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