



March 31, 2020

Via Email Only, Return Receipt Requested

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

Janet Ross
Assistant Commissioner Clinical and Professional Services, Director of Licensing
Department of Mental Health
25 Staniford Street
Boston, MA 02114

RE: 105 CMR 130.122 – DPH 90 Day Notice
104 CMR 27.03 - DMH 90 Day Notice

Dear Mr. Davis and Ms. Ross:

This letter is submitted on behalf of The Mercy Hospital, Inc. (d/b/a Mercy Medical Center), located at 271 Carew Street, Springfield, MA 01104 regarding its licensed satellite campus, Providence Behavioral Health Hospital ("Providence Hospital Campus") located at 1233 Main Street, Holyoke, MA 01040 (collectively, the "Hospital"). Mercy Medical Center is a community hospital, which has been serving the needs of Western Massachusetts for 150 years. On its Providence Hospital Campus, the Hospital is currently licensed to operate a 50-bed inpatient Psychiatric Service, a 24-bed inpatient Pediatric Service, and a 57-bed inpatient Alcoholism Treatment Service.

Facing serious psychiatrist shortages that will prevent its future ability to provide safe, quality care, Providence Behavioral Health Hospital, part of Mercy Medical Center, plans to discontinue inpatient psychiatric services at Providence Hospital in Holyoke as of June 30, 2020, including its adult, geriatric and pediatric services. Substance use disorder services which will continue at Providence Hospital—the 57-bed Acute Treatment Service (detoxification), Clinical Stabilization Service (post-detoxification), and outpatient substance use disorder services. Collaborative planning is ongoing to help patients affected by discontinuation of the inpatient psychiatric services access timely psychiatric care.

While licensed for 74 inpatient psychiatric beds, Providence Hospital has regularly operated at a daily census of less than 60 over the past two years due to persistent provider shortages that have now become critical. As of July 1, 2020, Providence Behavioral Health Hospital will have no Medical Director of the facility and a total of six psychiatric provider vacancies.

According to HRSA.gov, Hampden County and specifically Springfield and Holyoke have maintained a mental health professional shortage of 5.1 providers for several years. <https://data.hrsa.gov/tools/shortage-area>. Additionally, there is a nationwide shortage to which Massachusetts is subject for attracting and retaining providers. The Kaiser Family Foundation reports that in Massachusetts, only 32% of the need is met and there is a statewide deficit of 17 psychiatrists. <https://www.kff.org/other/state-indicator/mental-health-care-health-professional-shortage-areas> Seventy-seven percent of counties in the United States are underserved and 55 percent of states have a “serious shortage” of child and adolescent psychiatry. Even in urban and suburban geographic areas with adequate ratios of psychiatrists, the supply of psychiatrists who work in inpatient and outpatient psychiatric facilities has been reduced by psychiatrists who practice exclusively in cash-only private practices. These practitioners now make up 40 percent of the psychiatric workforce, the second highest among medical specialties after dermatologists. https://www.thenationalcouncil.org/wp-content/uploads/2017/03/Psychiatric-Shortage_National-Council-.pdf

As such, please accept this letter as written ninety (90) day notice of the Hospital's decision to discontinue operation of its licensed 50-bed inpatient Psychiatric Service and 24-bed inpatient Pediatric Service at its Providence Hospital Campus, located at 1233 Main Street, Holyoke, MA 01040, by June 30, 2020, following completion of the regulatory processes of the Department of Public Health (“DPH”) and the Department of Mental Health (“DMH”).

The following information is included for your review and consideration:

Current Utilization Rates

The following represents the average daily census of the services for fiscal year since FY2017:

Service	FY2017	FY2018	FY2019	FY2020 (YTD)
50-bed inpatient Psychiatric Service	43.3	37.6	41.8	39
24-bed inpatient Pediatric Service	15.1	12.3	7.0	6.8

Since FY2017, the Pediatric Service's yearly average daily census ranged from a high of only 15.1 in FY17 to a low of 6.8 in FY20. Over the same period, the inpatient psychiatric service's yearly average daily census ranged from a high of only 43.3 in FY17 to a low of 37.6 in F18. Providence Behavioral Health Hospital has generally operated with an average of 6 full time psychiatrists for the past two years: 1 MD for Child/Adolescent, 3 MDs for adult, 1 MD for Older Adult and 1 MD for C&L. Minimum staffing would also include three additional psychiatric providers, an APRN for Child/Adolescent, for adult, and for older adults; Providence has not been able to meet these standards. The provider shortage has reached a critical point where it will prevent our ability to provide safe, quality care to patients.

Anticipated Impact of Discontinuance

As part of the Hospital's planned discontinuation, existing inpatients will be stabilized and discharged to appropriate outpatient services for continued care prior to closing. After June 30, patients who are in need of inpatient psychiatric services who present to the Hospital will be stabilized in the emergency department for transfer to another accepting provider with an available bed at the time service is needed. Typically these transfers occur by ambulance. For patients referred by phone and for inquiries from other hospitals performing a bed search, callers will be informed that admission to Providence is no longer an option and other options will be provided. It is anticipated for a period of time post-closure, Providence staff will maintain an inventory of available beds in the region on a daily basis to facilitate bed placement.

According to analysis of the most recent inpatient utilization data available, there remains an adequate number of adult and geriatric inpatient psychiatric beds available in the region upon closure of the beds at Providence. Pediatric inpatient psychiatric available beds will be increased by utilization of Mt. Sinai Hospital in Hartford. Since most of Providence's psychiatric originate in the greater Springfield and Holyoke areas, every effort will be made to refer them to other providers within a comparable distance. Patients assessed in the Mercy ED as needing inpatient treatment will be stabilized and transferred via ambulance to the closest available bed, with the majority anticipated to be referred to one of the facilities below:

Drive Time Alternatives from Mercy ED

	Travel time
Holyoke Medical Center (3 mi)	6 min
Baystate Wing (19 mi)	21 min
Baystate Medical Center (2 mi)	4 min
Harrington Hospital (39 mi)	42 min
Brattleboro Retreat, VT (48 mi)	52 min
TaraVista (80 mi)	87 min
Hospital Behavioral Medicine (52 mi)	57 min
Johnson Memorial Hospital, CT (28 mi)	30 min
Mt. Sinai Hospital, CT (26 mi)	28 min
Hebrew Senior Care, CT (29 mi)	49 min

Visitors and families may experience additional drive times. Mercy Medical Center is working with public transportation entities to provide transportation for immediate family members of a patient who is hospitalized in an alternative facility and who have no means with which to visit their family member.

Discharged patients may experience additional drive times. It is standard practice for inpatient facilities to arrange transportation for discharged patients. Patients referred from Mercy Medical Center for psychiatric services at another hospital will have their transportation arranged by those facilities at discharge.

Date of Discontinuation

Ninety (90) day notice is hereby given for a discontinuance date of June 30, 2020.

Health Care Coalitions and Community Groups

The following organized health care coalitions and community groups are known the hospital and may have an interest in this discontinuation:

Mental Health Association

102 Elm St.
Westfield, MA 01085

Carson Center

7 Mill St. Suite 251
Westfield, MA 01085

Samaritan Inn

7 Free St.
Westfield, MA 01086

Forum House

55 Broad St.
Westfield, MA 01085

River Valley Counseling Center

303 Beech St.
Holyoke, MA 01040

Valley Psychiatric Services

7 Open Square Way, 1st Fl.
Holyoke, MA 01040

Chicopee Health Center/ Holyoke HC

505 Front St.
Chicopee, MA 01013

Behavioral Health Network (BHN)

417 Liberty Street
Springfield, MA 01104

Community Services Institute (CSI)

1695 Main St.
Springfield, MA 01104

Gandara Mental Health Clinic

2155 Main St.
Springfield, MA 01104

VA Central Western Massachusetts Healthcare System

421 N. Main St.
Leeds, MA 01053

Center for Human Development (CHD)

332 Birnie Avenue
Springfield, MA 01107

NAMI

324A Springfield St
Agawam, MA 01001

Clinical & Support Options (CSO)

8 Atwood Drive, Suite 201
Northampton, MA 01060

Brien Center

359 Fenn Street
Pittsfield, MA 01201

Service Net

50 Pleasant Street
Northampton, MA 01060

Community Engagement and Planning

The Hospital has undertaken the following community engagement and planning activities:

Dialogue, assessment, analysis, and planning has been ongoing since November, 2017. Work product from these efforts includes confirmation that there is sufficient inpatient bed capacity remaining to serve Hampden County, which is designated by Mercy Medical Center as its primary service area, upon discontinuation of inpatient psychiatric services at Providence Behavioral Health Hospital.

The Hospital has engaged with hospitals within the Trinity Health Of New England system and other hospitals in western Massachusetts, central Massachusetts, northern Connecticut, and southern Vermont, including the hospitals included on the chart below (2019 Utilization Data):

Facility & Distance	# of	Utilization	Days Available	Occupancy	Avg Available
	Beds				
Holyoke Medical Center (3 mi)	20	6,457	7,300	89.00%	2
Baystate Wing Hospital (19 mi)	28	8,261	10,220	81.00%	5
Baystate Medical Center (2 mi)	28	10,056	10,220	98.00%	1
Harrington Hospital (39 mi)	14	3,904	5,110	76.00%	3
Brattleboro Retreat (48 mi)	119	36,477	43,435	84.00%	19
TaraVista (80 mi)	108	8,568	39,420	22.00%	85
Hospital Behavioral Medicine (52 mi)	120	(New)	43,800	TBD	TBD
Johnson Memorial Hospital (28 mi)	20	4,526	7,116	64.00%	7 - 15
Mt Sinai Hospital (26 mi)	85	24,307	39,601	61.00%	10 A, 8 C&A
Hebrew Senior Care (29 mi)	38	7,230	8,030	90.00%	16
					156 - 164

The Hospital has also engaged with community providers in Hampden County, including, Behavior Health Network and Trinity Health Of New England Medical Group. The Hospital is developing other service options for patients, including behavioral health integrated into primary care in Trinity Health Of New England Medical Group; service arrangements with community partners for mental health and crisis stabilization; and expanded capacity at other inpatient sites within the Trinity system at Mt. Sinai and Johnson Memorial Hospital.

The Hospital has also solicited input from regulators and policy makers, including:

- Massachusetts Executive Office of Health and Human Services
- Massachusetts Department of Mental Health
- Massachusetts Department of Public Health
- Members of the Hampden County Legislative Delegation

Thank you for your attention to this matter. We look forward to sharing additional information with you soon. In the meantime, please do not hesitate to contact us if you have any questions or require any additional information.

Sincerely,

Handwritten signature of Deborah A. Bitsoli in cursive script.

Deborah Bitsoli, President
Mercy Medical Center and its affiliates

Sincerely,

Handwritten signature of Dr. Robert Roose in cursive script.

Dr. Robert Roose, Chief Medical Officer
Mercy Medical Center

Cc: J. Mikula, DMH
E. Kelley, DPH
S. Lohnes, DPH
W. Mackie, DPH
R. Rodman, DPH
Health Policy Commission
Office of the Attorney General
Center for Health Information and Analysis
Executive Office of Labor and Workforce Development