

# HUSCH BLACKWELL

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July 26, 2023

**VIA EMAIL**

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

Re: Baystate Noble Hospital – 90 Day Notice of Closure of Certain Services

Dear Mr. Davis:

We write on behalf of Baystate Noble Hospital, located at 115 West Silver Street, Westfield, MA 01085 (the “Hospital”) and an affiliate of the Baystate Health, Inc. (“Baystate”) integrated health care delivery system. Pursuant to 105 CMR 130.122(B), the Hospital hereby provides ninety (90) days’ notice to the Department of Public Health (“Department”) of its decision to discontinue the Hospital’s inpatient psychiatric treatment unit, consisting of 20 beds, and the partial hospitalization program (the “Services”), in order to move the Services to a newly constructed inpatient psychiatric hospital with 120 beds in Holyoke to be operated by a joint venture entity of which Baystate is a partner. These changes by the Hospital are part of a comprehensive plan across Baystate for enhancements in the delivery of behavioral health services that will result in an increase in the number of inpatient behavioral health beds in Baystate’s service area.

After much due diligence, Baystate has partnered with Lifepoint Behavioral Health, a business unit of Lifepoint Health, to build and operate a new behavioral health hospital in Western Massachusetts. This new freestanding facility will be named Valley Springs Behavioral Health Hospital (“Valley Springs”). It will consolidate – and expand – behavioral health services across Baystate’s service area, increasing access for the patients throughout Western Massachusetts. Valley Springs will increase capacity for behavioral health patients by greater than 50% with approximately 120 beds for inpatient behavioral healthcare for adults and children/adolescents in a dedicated, state-of-the-art hospital.

Although Baystate has multiple inpatient behavioral health units, the total bed capacity for the region is inadequate. As a result, lengthy inpatient boarding in Emergency Departments is common, and patients frequently need to be transferred outside of the region for inpatient psychiatric care. Valley Springs also will provide a 30-bed long-term care unit for patients

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requiring prolonged hospitalization through the Massachusetts Department of Mental Health, providing a new facility for patients currently placed at the soon-to-close Vibra Health. Medically complex behavioral health patients will continue to be served at the main campus of Baystate Medical Center, Baystate Health's tertiary care academic medical center. Baystate Health will continue to provide outpatient behavioral health services on a regional basis, including but not limited to its child partial hospitalization program in Holyoke, MA and addiction recovery services in Palmer, MA.

The decision to relocate the Services to the Valley Springs was made following a comprehensive review of the health care needs of residents of Western Massachusetts. Baystate continually assesses the healthcare needs in its service area and evaluates the clinical impact of and access to existing services. Through this ongoing evaluation, and in consideration of the voices of the community, including the information from the region's Community Health Needs Assessment, it is clear that access to behavioral health is a top priority in the region. By building this new behavioral health hospital, Baystate will increase capacity by greater than 50% in a state-of-the-art hospital.

As a partner to Baystate, LifePoint Health brings access to capital and expertise in constructing and operating a stand-alone behavioral health facility. The partnership will add value by delivering on a more efficient care model in a single, stand-alone behavioral health inpatient facility. The construction of a state-of-the-art facility will expand current bed capacity and enhance inpatient care for pediatric and adolescent patients as well as other specialized populations (i.e., behaviorally disruptive patients, those with substance abuse issues or dual diagnosis, and geriatric patients). Valley Springs will offer an innovative care model that is efficient and effective for the patient populations served. Baystate and LifePoint are committed to a shared governance model with oversight of key operating performance indicators including patient admission decisions, clinical quality and patient safety metrics, and employee safety.

Due to the simultaneous opening of Valley Springs, the Hospital will continue to deliver quality care without interruption and with minimal impact on patients. The Hospital will coordinate with Valley Springs to ensure a smooth transition leading up to the closure of Services.

In compliance with applicable requirements at 105 CMR 130.122(B), the Hospital provides this written notice of the planned discontinuance of the Services. The following information regarding the discontinuation is hereby provided for your review:

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## 1. Current and historical utilization rates (volume) for the Service (Fiscal Year YTD and last full Fiscal Year).

The Hospital has 20 inpatient psychiatric beds and an outpatient Partial Hospitalization Program.

Service	Number of Patients 2023 FY YTD April	Number of Patients FY2022
Inpatient Psychiatric Unit	300	497
Partial Hospitalization Program	173	314

## 2. A description of the anticipated impact on individuals in the Hospital's service area following the closure of the Services.

Any impact on patients due to the closure of the Services will be mitigated by the simultaneous opening of Valley Springs. The total inpatient psychiatric bed capacity for the region is inadequate. As a result, lengthy inpatient boarding in Emergency Departments is common, and patients frequently need to be transferred outside of the region. By building a state-of-the-art facility with expanded bed capacity and enhanced inpatient care for pediatric and adolescent as well as other specialized populations (i.e., behaviorally disruptive patients, those with substance abuse issues or dual diagnosis, and geriatrics patients), Valley Springs will offer an innovative care model that is efficient and effective for the patient populations served. Valley Springs will be located in Holyoke, which is centrally located within the region and is proximate to Route 91, so it will be easily accessible to patients in the region. Moreover, the Hospital and Valley Springs will closely coordinate the closure of Services to coincide with the opening of the same or greater capacity at the new Hospital. This will ensure that the region does not experience any loss in capacity during the transition.

## 3. Date for the closure of the Services.

The Services will not close until Valley Springs is ready to accept patients at a capacity level consistent with the closing units. The expected closure date will be sometime between late October and early December.

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**4. Names and addresses of any organized health care coalitions and community groups known to the Hospital when the notice is issued to DPH that would have an interest in the closure of the Services. (Please list).**

NAMI Western Massachusetts  
324A Springfield Street  
Agawam, MA 01001

**5. A detailed account of any community engagement and planning which has occurred prior to filing notice of the closure of the Services.**

Baystate Health has engaged in a robust planning process to transition behavioral health units at some of its hospitals to the new behavioral health hospital with expanded bed capacity and enhanced inpatient care for pediatric and adolescent patients. As part of that process, the Hospital has engaged in ongoing communication with elected officials and the community about these plans since 2020. In addition, the Hospital has communicated regularly with Hospital medical staff and employees about the plan to move the Service to Valley Springs.

In addition, the Hospital has consulted with the Hospital's Community Advisory Council (CAC) and its Community Benefit Advisory Council (CBAC) for the Hospital, both of which are made up of diverse individuals from community-based organizations representing the Hospital's service area. The Hospital's 2022 Community Health Needs Assessment (CHNA) identified behavioral health and youth behavioral health needs as top priorities for the communities served by the Hospital. The Hospital has used the findings of the CHNA and the input of the community provided in developing the CHNA as a guide in planning the transition of the Service to Valley Springs.

Representatives of the Hospital have also communicated with state and local representatives and officials, including Senator John C. Velis, Representative Kelly W. Pease, Michael A. McCabe, Mayor, City of Westfield, John J. Beltrandi III, City Council President, City of Westfield, Ralph James Figy, City Council, Ward 2, City of Westfield and the entire membership of the Westfield City Council.

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

Sincerely,

HUSCH BLACKWELL LLP



Crystal M. Bloom

cc: J. Bernice, DPH  
M. Bramanate, DPH  
S. Carlson, DPH  
R. Kaye, Esq., DPH  
E. Kelley, DPH  
W. Mackie, Esq., DPH

Health Policy Commission  
Office of the Attorney General  
Center for Health Information and Analysis  
Executive Office of Labor and Workforce Development