

February 4, 2021

Via E-Mail

Lara Szent-Gyorgyi, MPH
Director, Determination of Need Program
Department of Public Health
250 Washington Street
Boston, MA 02511

Re: Beth Israel Deaconess Hospital – Plymouth – Application to Add Geriatric Psychiatric Beds Pursuant to Order of the Commissioner of Public Health Regarding Determination of Need Approvals Related to COVID-19

Dear Ms. Szent-Gyorgyi:

Beth Israel Deaconess Hospital - Plymouth, located at 275 Sandwich Street, Plymouth, MA 02360 ("Applicant") respectfully requests that the Department of Public Health ("DPH") approve the addition of five (5) inpatient geriatric psychiatric beds to its existing unit known as the Senior Behavioral Health Center ("SBHC") to address the needs of its patient panel ("Proposed Project"). Approval for the Proposed Project is being requested in accordance with the Department of Public Health's Updated Guidance for Requesting Determination of Need (DoN) Approval for projects related to COVID-19 during the State of Emergency, issued on November 24, 2020.¹ We offer the following information.

The Applicant currently holds a license to operate 19 inpatient geriatric psychiatric beds at SBHC. More than one out of five adults over the age of 60 suffer from a mental or neurological disorder.² Older individuals with behavioral health disorders face unique challenges due to advanced age and existence of co-morbidities.³ In Massachusetts, nearly one-third of the elderly population has been diagnosed with depression, while one in four have been diagnosed with anxiety,⁴ demonstrating a significant need for behavioral health care. Individuals with behavioral health needs often face barriers to treatment, including extended wait times. For example, an estimated 38% of American adults have needed to wait longer than one week to receive mental health services.⁵ In addition, limited inpatient capacity results in patients boarding in the Emergency Department ("ED") until

¹ Updated Guidance: Requesting Determination of Need (DoN) Approval for projects related to COVID-19 during the State of Emergency (Nov. 24, 2020).

² WHO, *Mental Health of Older Adults* (Dec. 12, 2017), available at <https://www.who.int/news-room/fact-sheets/detail/mental-health-of-older-adults>.

³ *Id.*; Amy Fiske et al., Depression in Older Adults, 5 ANN. REV. CLINICAL PSYCHOLOGY 383 (2009), available at <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC2852580/>.

⁴ 2018 Healthy Aging Data Report, *Highlights from Massachusetts*, MASSACHUSETTS HEALTHY AGING COLLABORATIVE 11, available at http://mahealthyagingcollaborative.org/wp-content/uploads/2018/12/MA_Healthy_Aging_Highlights_2018.pdf.

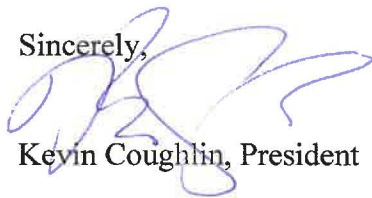
⁵ COHEN VETERANS NETWORK & NAT'L COUNCIL FOR BEHAVIORAL HEALTH, *America's Mental Health 2018: Attitudes & Access to Care* (Oct. 10, 2018), available at <https://www.cohenveteransnetwork.org/wp-content/uploads/2018/10/Research-Summary-10-10-2018.pdf>.

an inpatient psychiatric bed becomes available.⁶ The COVID-19 pandemic has further impacted existing capacity constraints, particularly for inpatient psychiatric beds.⁷ Accordingly, patients seeking behavioral health care may forego treatment, face delayed treatment, or not receive treatment in the most appropriate setting. Through the Proposed Project, the Applicant will improve access to inpatient geriatric psychiatric care in the appropriate setting, resulting in improved health outcomes.

Accordingly, to address the needs of its patient panel, the Applicant seeks to expand its existing inpatient geriatric psychiatric service at SBHC by 5 beds, for a total of 24 licensed inpatient geriatric psychiatric beds. The cost associated with the Proposed Project is \$602,114.

Thank you for our attention to this matter. Please feel free to contact me or Andrew Levine, Esq. at (617) 462-2676 if you have any questions or require any additional information.

Sincerely,



Kevin Coughlin, President

cc: S. Boyd, Esq., BILH
M. Schuyler, BILH
A. Levine, Esq.
S. Lohnes, Esq., DPH
R. Rodman, Esq., DPH
J. Ross, DMH

⁶ Mark D. Pearlmutter, MD et al., *Analysis of Emergency Department Length of Stay for Mental Health Patients at Ten Massachusetts Emergency Departments*, 70 ANNALS EMERGENCY MED. 193 (2014).

⁷ Eral Bojdani et al., *COVID-19 Pandemic: Impact on Psychiatric Care in the United States*, 289 PSYCHIATRY RES. 113069 (2020), available at <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC2852580/>.