



January 14, 2021

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

RE: The Children's Medical Center Corporation for its facility The Children's Hospital Corporation (d/b/a/ Boston Children's Hospital – Application to Add Adolescent & Pediatric Psychiatric Beds Pursuant to Order of the Commissioner of Public Health Regarding Determination of Need Approvals Related to COVID -19

Dear Ms. Szent-Gyorgyi:

The Children's Medical Center Corporation (the "Applicant") respectfully requests that the Department of Public Health ("DPH") approve the addition of a 12 bed inpatient adolescent and pediatric psychiatric unit at its Waltham campus, located a 9 Hope Avenue, Waltham, MA 02453, to its license to address the needs of its patient panel ("Proposed Project") 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.<sup>1</sup>

Boston Children's Hospital currently holds a license for 16 inpatient pediatric psychiatry beds on its Boston, MA campus. Boston Children's Hospital also operates a Community Based Acute Treatment (CBAT) Program, a 12-bed intensive, short-term acute residential unit for children and adolescents experiencing behavioral health difficulties on its Waltham, MA campus. The CBAT program was opened in response to the growing need for services for this population. These two

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<sup>1</sup> Updated Guidance: Requesting Determination of Need (DoN) Approval for projects related to COVID-19 during the State of Emergency (*November 24, 2020*).

units serve children from throughout the state and do not have sufficient capacity to meet the growing needs of the patient population.

The COVID-19 pandemic has resulted in even greater need for access to inpatient adolescent and pediatric psychiatric services due to quarantine orders, remote learning and destabilization of families.<sup>2</sup> Beginning in April 2020, the proportion of children’s mental health–related ED visits among all pediatric ED visits increased and remained elevated through October. Compared with 2019, the proportion of mental health–related visits for children aged 5–11 and 12–17 years increased approximately 24% and 31%, respectively.<sup>3</sup> Limited inpatient capacity has required BCH to board this vulnerable patient population in our emergency room and inpatient medical/surgical units waiting placement in an appropriate unit. In summary, across all settings, BCH has witnessed a 85% increase in average daily census of behavioral health patients over the last four years, as summarized below:

	<i>Average Daily Census</i>				
	<u>2017</u>	<u>2018</u>	<u>2019</u>	<u>2020</u>	<u>Q1 FY21</u>
Boston Inpatient Psychiatry Unit	14.3	13.9	14.9	13.7	12.7
Community Based Acute Treatment	7.9	8.0	8.7	8.8	11.0
Inpatient & ED Boarders	7.0	8.7	12.7	14.8	30.3
<b>Total</b>	<b>29.1</b>	<b>30.6</b>	<b>36.3</b>	<b>37.2</b>	<b>54.0</b>
% Change		4.9%	18.7%	2.5%	45.0%
Cumulative Change					85.2%

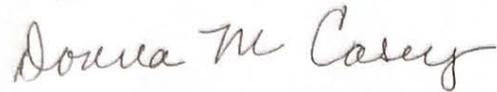
In response, Boston Children’s Hospital proposes to renovate approximately 9,995 square feet of space on its Waltham campus which was recently vacated by an independent provider of adolescent and adult psychiatry services. This request includes renovation of the shell space adjacent to this unit in order to conduct that work most cost effectively and eliminate disruption to psychiatric care once the unit is licensed. The scope of this works includes design, abatement, demolition, mechanical, electrical and plumbing (MEP) preparation. The total renovation is expected to take eight months, with the costs projected to be \$10,000,000. In addition to this DON request and consistent with our conversations with DPH and DMH attorneys, Boston Children’s will also be seeking flexibility related to self-certification with the licensure requirements to add 12 inpatient adolescent and pediatric psychiatry beds to its license.

<sup>2</sup> Karen Dineen Wagner, MD, PhD, *New Findings About Children’s Mental Health During COVID-19*, Psychiatric Times (October 7, 2020), <https://www.psychiatrictimes.com/view/new-findings-children-mental-health-covid-19>.

<sup>3</sup> Leeb RT, Bitsko RH, Radhakrishnan L, Martinez P, Njai R, Holland KM. Mental Health–Related Emergency Department Visits Among Children Aged <18 Years During the COVID-19 Pandemic — United States, January 1–October 17, 2020. *MMWR Morb Mortal Wkly Rep* 2020;69:1675–1680. DOI: <http://dx.doi.org/10.15585/mmwr.mm6945a3>external icon.

Thank you for your attention to our request. Please feel free to contact me (617) 355-2683 or Josh Greenberg (617) 919-3063 if you have any questions or require any additional information.

Sincerely,

A handwritten signature in cursive script that reads "Donna M. Casey".

Donna M. Casey  
Vice President, Strategic Business Planning, Analysis & Budget  
Boston Children's Hospital  
[Donna.Casey@Childrens.Harvard.Edu](mailto:Donna.Casey@Childrens.Harvard.Edu)

CC: Elizabeth Kelley, Director Bureau of Health Care Safety and Quality, DPH  
Sherman Lohnes, Division of HealthCare Facility Licensure and Certification, DPH  
Rebecca Rodman, Senior Deputy General Counsel, DPH  
Lester Blumberg, General Counsel, DMH  
Janet Ross, Assistant Commissioner for CPS/Director of Licensing  
Amanda Cassel-Kraft, Deputy Medicaid Director, EOHHS  
Joshua Greenberg, Vice President, Government Relations, BCH  
Chris Kirby, Vice President and Deputy General Counsel, BCH