



The Commonwealth of Massachusetts  
Executive Office of Health and Human Services  
Department of Public Health  
Bureau of Health Care Safety and Quality  
Division of Health Care Facility Licensure & Certification  
67 Forest Street, Marlborough, MA 01752

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June 5, 2020

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Deborah Bitsoli  
President  
Mercy Medical Center  
271 Carew Street  
Springfield, MA 01104

BY EMAIL ONLY

**Re: Review of Response Following Essential Services Finding**

**Facility:** Mercy Medical Center/Providence Behavioral Health Hospital  
**Services:** 50 Bed Inpatient Psychiatric Service,  
24 bed Inpatient Pediatric Service  
**Ref. #:** 2150-138

Dear Ms. Bitsoli:

On May 29, 2020, the Department of Public Health ("Department") received from you, on behalf of Mercy Medical Center, a response to our May 15, 2020, letter indicating that Mercy Medical Center must file a plan with the Department detailing how access to services will be maintained following the discontinuation of fifty inpatient psychiatric beds and twenty-four pediatric beds at Mercy Medical Center's Providence Behavioral Health Hospital campus.

Pursuant to 105 CMR 130.122(G) the Department has completed its review of the submitted access plan, in consultation with the Department of Mental Health. The response does not adequately meet the needs of the patients in the community. The Department is deeply concerned that the proposed closure of fifty inpatient psychiatric beds and twenty-four pediatric beds on or about June 30, 2020, will impact the timely admission and treatment of persons in need of inpatient psychiatric care in the Springfield area and western Massachusetts. As a result, Mercy Medical Center must re-assess the proposed date for the closure of these beds so as to best meet the needs of those individuals presenting with a need for inpatient psychiatric care.

In addition, the Department has the following comments:

1. **Continuing Care Until June 30, 2020:** In its letter of May 15, 2020, the Department requested information detailing mechanisms to maintain continuity of care of current patients of the discontinued service. In its response, Mercy Medical Center stated, “Until June 30, 2020, all patients will continue to be cared for at Providence Hospital.”

It is our understanding, based on communications from Mercy Medical Center and discussion with the Department of Mental Health, that Mercy Medical Center closed the Providence Behavioral Health Hospital child/adolescent unit on May 20, 2020 without notice to the Department. The Department is concerned that the Hospital would discontinue such a unit nine days before submitting a plan which states the patients cared for in this unit would continue to receive care at Providence Behavioral Health Hospital until June 30, 2020.

Further, the Department is concerned the closure of this unit may have compromised the ability of Mercy Medical Center to comply with its plan as outlined in the May 29, 2020 letter to the Department. The plan states Mercy Medical Center is working with public transit entities to provide transportation for patients and their families *during the transition*. Additionally, the plan stated Mercy Medical Center would notify regular referral sources in advance of the discontinuation of inpatient psychiatric services at Providence Behavioral Health Hospital. The Department requests that, in response to this letter, Mercy Medical Center clarify whether these steps were taken ahead of the closure of the unit and update the plan with steps that will be taken to prevent similar closures ahead of the proposed closure date.

2. **Bed Availability at Alternate Sites:** In its letter of May 15, 2020, the Department requested information regarding the capacity of alternative care delivery sites. In its response, Mercy Medical Center provided a list of facilities in Massachusetts and Connecticut as potentially available to patients.

The beds and utilization rates given for area facilities appear to roll all types of capacity together. The Department requests that, in response to this letter, Mercy Medical Center provide a more specific breakdown of beds by service type and utilization rates at area facilities to more accurately reflect the ability of these facilities to meet demand.

3. **Insurance Plans Accepted:** In its letter of May 15, 2020, the Department requested information addressing whether patients with MassHealth will be covered for care in out-of-state facilities. In its response, Mercy Medical Center indicated it has “offered to include” Mt. Sinai and Johnson Memorial inpatient psychiatric services in the Massachusetts Behavioral Health Partnership. The Department requests that, in response to this letter, Mercy Medical Center update its plan to reflect the current status of these facilities in the Massachusetts Behavioral Health Partnership network.

Under the provisions of 105 CMR 130.122(G), Mercy Medical Center must submit a timely response to the comments of the Department. Please submit your comments within 10 days of your receipt of this letter to my attention, in order that we may complete our review of the pending closure.

Thank you for your continued cooperation in this process. If you have any questions, please contact me at [Sherman.Lohnes@State.MA.US](mailto:Sherman.Lohnes@State.MA.US)

Sincerely,

A handwritten signature in black ink, appearing to be 'SL', written in a cursive style.

Sherman Lohnes  
Division Director

cc: E. Kelley, DPH  
S. Davis, DPH  
R. Rodman, DPH  
M. Callahan, DPH  
K. Haynes, DPH