

# HUSCH BLACKWELL

Crystal Bloom  
Partner

One Beacon Street, Suite 1320  
Boston, MA 02108  
Direct: 617.598.6783  
Fax: 617.720.5092  
crystal.bloom@huschblackwell.com

September 11, 2023

## Via Email

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

Re: Baystate Medical Center Essential Services Finding

Dear Mr. Davis:

We write on behalf of Baystate Medical Center (“Medical Center”) in response to the Department of Public Health’s (the “Department”) Essential Service Finding letter, dated August 24, 2023, concerning the closure of Medical Center’s 12 bed inpatient pediatric psychiatric unit and its outpatient adult partial hospital program (“PHP”) located at 759 Chestnut Street, Springfield, MA 01199. In compliance with the regulatory requirements at 105 CMR 130.122, the Medical Center offers the following plan to maintain access to psychiatric services and provides the additional information requested in the Department’s letter.

### **1. Information on utilization of the services prior to proposed closure.**

The following table details the Medical Center’s historical utilization for the PHP service and the pediatric and adolescent inpatient psychiatric unit from Fiscal Year (“FY”) 2021 through FY23 through July 2023.

Unit	FY21	FY22	FY23 (Oct-July)
Baystate Adult PHP Visits	1,047	576	413
Baystate Inpatient Pediatric Psychiatric Discharges	900	849	611

### **2. Information on the location and service capacity of alternative delivery sites. Include an explanation of the basis for the Hospital’s determination that the alternative delivery sites do or do not have the capacity (necessary space, resources, etc.) to handle the increased patient volume at the identified sites. To support that assertion, please provide the following specific details:**

**(a) Current utilization at these alternative sites;**

The following table lists the nearest alternative sites and number of licensed beds for inpatient pediatric psychiatry services from the surrounding 5-county area.

<b>Hospital</b>	<b>Address</b>	<b># of Beds</b>
<b>Valley Springs Behavioral Health Hospital</b>	<b>45 Lower Westfield Road, Holyoke</b>	<b>24</b>
Mira Vista Behavioral Health Center	1233 Main Street, Holyoke	16
Hospital for Behavioral Medicine	100 Century Drive, Worcester	28
Westborough Behavioral Healthcare Hospital	300 Friberg Parkway, Westborough	51
MetroWest Medical Center	67 Union Street, Natick	17

It is important to recognize that Baystate Health in partnership with LifePoint Behavioral Health recently opened Valley Springs Behavioral Health Hospital (“Valley Springs”), a new inpatient psychiatric hospital in Holyoke that will have 150 total beds, of which 24 beds will be licensed for pediatric patients. This represents an increased capacity of 12 inpatient pediatric beds in close proximity to Medical Center.

Additionally, Valley Springs will open a PHP program later this year when the Medical Center’s service closes. The PHP program at Valley Springs will accommodate level of demand for PHP services at the Medical Center. Other alternative sites for adult PHP include

<b>PHP</b>	<b>Address</b>
<b>Valley Springs Behavioral Health Hospital</b>	<b>45 Lower Westfield Road, Holyoke</b>
Holyoke Medical Center	575 Beech Street, Holyoke
Behavioral Health Network	417 Liberty Street, Springfield
The Brien Center	359 Fenn, Street, Pittsfield

**(b) Type of services available at the alternative sites;**

The alternative sites identified provide inpatient pediatric psychiatric services and adult PHP services. With the expanded capacity offered at Valley Springs and the coordination of the closure of the Medical Center’s services to ensure continued access, patients will have access to the same services at Valley Springs in a new facility focused on providing behavioral health services.

**(c) Type of medical diagnoses accepted; and**

Valley Springs and the other alternative site hospitals identified provide inpatient services that include evaluation and treatment of the following acute mental health diagnoses: anxiety disorders, including substance use disorder, phobias and panic disorders, mood disorders, including bipolar disorder, neurobehavioral disorders, personality disorders, schizophrenia, and women’s mental health disorders.

**(d) Adequacy of space and resources at the alternative sites.**

As discussed in response to question 2(a), Valley Springs will serve as a replacement for the inpatient pediatric psychiatry beds closing at Medical Center, as well as the PHP program. Valley Springs is a state-of-the-art behavioral health hospital that will consolidate and expand behavioral health services across Baystate Health’s service area and increase patient access throughout Western Massachusetts. Valley Springs will increase capacity for pediatric behavioral health patients by 50% with 24 beds compared to the 12 beds that will close at Medical Center. The addition of adult PHP services at Valley Springs will ensure continued access to PHP services following the closure of the Medical Center PHP.

**3. Travel times to alternative service delivery sites, for both peak and non-peak travel times, and an explanation as to the source for this information or what these estimates are based on.**

As discussed above, the establishment of Valley Springs will serve as the primary alternative site when Medical Center’s inpatient beds and PHP program close, improving access for patients across the region and allowing care to remain close to home. The tables below provide drive times from Medical Center to the alternative sites identified<sup>1</sup>

<b>Inpatient</b>	<b>Hospital</b>	<b>Driving Time</b>
<b>Medical Center (Peak)</b>	MiraVista Behavioral Health	10 mins
	Valley Springs Behavioral Health Hospital	14 mins
	Hospital for Behavioral Medicine	1 hr 20 mins
	Westborough Behavioral Healthcare Hospital	1 hr 25 mins
	MetroWest Medical Center – Natick	1 hr 40 mins
<b>Medical Center (Non-Peak)</b>	MiraVista Behavioral Health	9 mins
	Valley Springs Behavioral Health Hospital	10 mins
	Westborough Behavioral Healthcare Hospital	1 hr 5 mins
	MetroWest Medical Center - Natick	1 hr 5 mins
	Hospital for Behavioral Medicine	1 hr 5 mins

<sup>1</sup> Source: Google Maps, Estimated Drive Time: Peak at 8:00AM and Non-Peak at 10:00PM.

PHP	Hospital	Driving Time
<b>Medical Center (Peak)</b>	Holyoke Medical Center	8 mins
	Behavioral Health Network - Liberty Street Clinic	16 mins
	The Brien Center - Pittsfield	1 hr 10 mins
<b>Medical Center (Non-Peak)</b>	Holyoke Medical Center	5 mins
	Behavioral Health Network - Liberty Street Clinic	10 mins
	The Brien Center - Pittsfield	55 mins

**4. An assessment of transportation needs post discontinuance and a plan for meeting those needs.**

Patients requiring acute mental health treatment typically arrive at the emergency department or a community behavioral health centers (“CBHC”). For patients presenting to the ED, a hospital crisis clinician assesses and makes referrals for inpatient care based on location, appropriateness of unit, patient preference, and bed availability. Patients requiring transfer to another hospital from Medical Center are transported by ambulance. CBHCs coordinate transportation to inpatient treatment facilities for patients requiring acute mental health care.

With the closure of the Medical Center’s inpatient pediatric psychiatry beds, patients arriving at the Hospital’s ED in need of inpatient services will be transported by ambulance to Valley Springs or another available psychiatric hospital based on capacity and patient choice. CBHCs and other hospitals will refer to Valley Springs or another alternative site and arrange for transport consistent with existing practice.

**5. A protocol that details mechanisms to maintain continuity of care for current patients of the discontinued service.**

The Medical Center will coordinate the closure of beds and the PHP to coincide with the opening of adequate beds at Valley Springs to ensure continued capacity in the region. The Medical Center will also keep its adult psychiatric beds open and available to the community. To minimize any disruption for existing pediatric inpatients, the Medical Center plans to suspend admissions to the inpatient pediatric psychiatric unit approximately two weeks before the planned closure. The typical length of stay for the average pediatric patient is approximately 8 days. By stopping new admissions two weeks prior to the closure, the Medical Center will complete the inpatient episodes of care for all or most of the patients on the unit prior to closure. Any patients remaining on the unit by the date of closure, the Medical Center will coordinate transfers to Valley Springs or other suitable alternative sites in the community. With respect to PHP patients, care will be transitioned to Valley Springs or another PHP program of their choosing.

- 6. A protocol that describes how patients in the Hospital's service area will access the services at alternative delivery sites. The protocol should specifically address the following:**
- (a) The process that will be employed to effectively refer patients to other facilities or providers;**

Patients arriving at the Medical Center for inpatient psychiatric services typically are admitted directly from Medical Center's ED, are referred to Medical Center by CBHCs or are transferred from another hospital. Following the closure, the Medical Center will facilitate the transfer of patients who present to the Medical Center's ED and require admission for inpatient psychiatric services. The Medical Center's crisis clinicians will make referrals for inpatient care based on location, appropriateness of unit, patient preference, and bed availability. Once an accepting facility is identified, Medical Center staff will coordinate transport by ambulance for the patient and ensure that the patient's medical record is transferred to facilitate continuity of care. CBHC's will refer pediatric patients to Valley Springs or another inpatient pediatric psychiatric facility with capacity. Similarly, other hospitals will work with an appropriate facility to accept transfers of pediatric patients in need of inpatient psychiatric services.

- (b) The impact that this may have on the current occupancy rates at alternative delivery sites;**

The significant increase in regional inpatient bed capacity and PHP services provided by Valley Springs will improve access for patients, allowing care to remain local without the need to refer patients to the other alternative delivery sites unless requested by the patient. In addition, the increased capacity will facilitate the reduction in rates of psychiatric patients boarding in local emergency rooms. The other alternative delivery sites are not likely to experience any increase in referrals due to the closure of the Medical Center's pediatric beds or PHP. As such, the closure will have minimal impact on occupancy rates at the alternative delivery sites aside from Valley Springs.

- (c) The ability of the alternative delivery sites to meet the needs of these patients; and**

As discussed above in response to Question 6(b), the opening of Valley Springs will provide continued access to care through expanded capacity in the region. As a result, the impact of the closure on the ability of alternative delivery sites to meet the needs of patients who would have historically been admitted to Medical Center will be insignificant.

**(d) Other alternatives if medical needs cannot be accommodated at the proposed alternative sites.**

Patients with co-occurring medical needs, will be referred to inpatient psychiatric units within general hospital; however, the need for pediatric patients to be admitted to an acute care hospital for inpatient psychiatric services is not common.

**7. Medically Complex Inpatients: In the Hospital's 90 Day Notice of Closure of Certain Services, the Hospital stated that, "Medically complex behavioral health patients will continue to be served at the main campus of Medical Center Medical Center, Medical Center Health's tertiary care academic medical center." The plan which you are required to submit must include information on how the Hospital will manage medically complex inpatients at the time of transition.**

As discussed in the response to Question 6(d), the Hospital will refer patients requiring medically complex or intensive behavioral health treatment to other acute care hospitals with inpatient psychiatric services. The need for pediatric patients to be admitted to an acute care hospital for inpatient psychiatric services is not as common as it is for adults. In the event there is a pediatric patient admitted to the Medical Center's unit at the time of closure, the patient will be assessed by their attending physician to determine the appropriate setting for continued care. If a patient requires continued services in an acute care hospital setting, the Medical Center will coordinate the transfer of the patient with the receiving facility.

We thank you for your attention to this matter. Please do not hesitate to contact Dominic Castillo, Esq., or me, if you have any questions or comments.

Sincerely,



Crystal Bloom

cc: E. Kelley, DPH  
J. Bernice, DPH  
R. Kaye, DPH  
W. Mackie, DPH  
J. Boeh-Ocansey, Jr., DPH  
M. Callahan, DPH  
V. Smith, Esq., Medical Center Health  
W. Kern, Medical Center Health  
J. Ward, Medical Center Health  
C. Ryan, Esq., Medical Center Health  
R. Rodman, Esq.  
A. Levine, Esq.  
D. Castillo, Esq.