

HUSCH BLACKWELL

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September 26, 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 Noble Hospital Essential Services Finding

Dear Mr. Davis:

We write on behalf of Baystate Noble Hospital Corporation (“Baystate”) in response to the Department of Public Health’s (the “Department”) Essential Service Finding letter, dated September 11, 2023, concerning the closure of the Inpatient Psychiatric Unit (“Hospital”) and the partial hospitalization program (“PHP”) located at Baystate Noble Hospital (the “Hospital”), 115 W Silver St, Westfield, MA 01085. In compliance with the regulatory requirements at 105 CMR 130.122, the Hospital offers the following plan to maintain access to psychiatric services and provide 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 Hospital’s historical utilization based on volume for the Partial Hospitalization Program (“PHP”) and discharges from the inpatient psychiatric services from Fiscal Year (“FY”) 2021 through FY23 through July 2023.

Unit	FY21	FY22	FY23 (Oct-July)
Adult PHP	287	313	255
Inpatient Psychiatric	579	490	454

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:

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(a) Current utilization at these alternative sites;

The following table lists the top-10 alternative sites for inpatient psychiatry services from the surrounding 5-county area.

Rank	Hospital	CHIA IP Volume from 5-County Area	
		FY 2020	FY 2021
1	Valley Springs Behavioral Health Hospital	N/A	N/A
2	UMass Memorial – University Campus	753	851
3	Harrington Memorial Hospital	720	694
4	Holyoke Medical Center	603	739
5	Berkshire Medical Center - Berkshire Campus	777	480
6	Heywood Hospital	607	533
7	<u>MetroWest</u> Medical Center - Leonard Morse Campus	577	558
8	Cooley Dickinson Hospital	644	488
9	Saint Vincent Hospital	453	356
10	Marlborough Hospital	214	163
	Baystate Medical Center	1058	1179

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

The alternative sites listed above provide inpatient psychiatric services to adults. 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 72 beds will be licensed for adult patients. This represents an increased capacity of 28 adult inpatient beds in close proximity to the Hospital

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

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

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(c) Type of medical diagnoses accepted; and

Valley Springs and the other alternative site hospitals identified provide inpatient services that include evaluations and treatment of the following acute mental health diagnoses: anxiety disorders, including 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 adult psychiatry beds closing at Hospital, 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 adult behavioral health patients by 28 beds compared to the 20 beds that will close at Hospital. The addition of adult PHP services at Valley Springs will ensure continued access to PHP services following the closure of the Hospital 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 the Hospital's beds PHP close. Valley Springs has the one of the shorter travel times of the alternative sites identified, improving access for patients across the region allowing care to remain close to home.

Driving Time to Alternative Sites Peak and Non-Peak Times¹

Inpatient	Hospital	Driving Time
Hospital (Peak)	Valley Springs Behavioral Health	24 mins
	Baystate Medical Center	26 mins
	Holyoke Medical Center	28 mins
	Cooley Dickinson Hospital	50 mins
	Harrington Memorial Hospital	1 hr 10 mins

¹ Source: Google Maps, Estimated Drive Time from 8:00AM (Peak) and 11:00PM (Non-Peak).

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	Saint Vincent Hospital	1 hr 25 mins
	Marlborough Hospital	1 hr 40 mins
	UMass Memorial University Campus	1 hr 40 mins
	UMass - Clinton	1 hr 50 mins
	MetroWest Medical Center – Leonard Morse Campus	1 hr 50 mins
Hospital (Non-Peak)	Holyoke Medical Center	18 mins
	Baystate Medical Center	20 mins
	Valley Springs Behavioral Health	22 mins
	Cooley Dickinson Hospital	35 mins
	Harrington Memorial Hospital	50 mins
	Saint Vincent Hospital	1 hr 0 mins
	Marlborough Hospital	1 hr 15 mins
	UMass - Clinton	1 hr 20 mins
	UMass Memorial University Campus	1 hr 20 mins
	MetroWest Medical Center – Leonard Morse Campus	1 hr 25 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 Hospital are transported by ambulance. CBHCs coordinate transportation to inpatient treatment facilities for patients requiring acute mental health care.

With the closure of the Hospital’s inpatient 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.

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The Hospital will coordinate the closure of beds to coincide with the opening of adequate beds at Valley. To minimize any disruption for existing adult patients, the Hospital plans to suspend admissions to the inpatient psychiatric unit approximately two weeks before the planned closure. The typical length of stay for the average adult patient is approximately 8 days. By stopping new admissions two weeks prior to the closure, the Hospital will complete the inpatient episodes of care for all or most of the patients on the unit prior to closure. If there are patients remaining on the unit by the date of closure, the Hospital will coordinate transfers to Valley Springs or other suitable alternative sites in the community.

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 Hospital for inpatient psychiatric services typically are admitted directly from Hospital's ED, are referred to the Hospital by CBHCs or are transferred from another hospital. Following the closure, the Hospital will facilitate the transfer of patients who present to the Hospital's ED and require admission for inpatient psychiatric services. The Hospital'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, Hospital 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 patients to Valley Springs or another inpatient psychiatric facility with capacity. Similarly, other hospitals will work with an appropriate facility to accept transfers of 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 Hospital's 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

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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 Hospital 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 hospitals including Baystate Medical Center (28 beds), Baystate Franklin Medical Center (22 beds), Holyoke Hospital (36 beds), and Cooley Dickinson Hospital (22 beds).

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 Baystate Medical Center, Baystate 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 an acute care hospital with inpatient psychiatric services Patients with this level of need who remain on the Hospital unit at the time of closure, will be assessed by their attending physician to determine the appropriate setting for continued care. Should there be a patient that requires continued inpatient psychiatric services at the time of closure, the patient will be transferred to another facility with the capability and capacity to care for both their psychiatric and medical needs. The patient will be transferred to an appropriate facility of their choice and the Hospital will arrange for transport. Hospital behavioral health administration will work directly with the receiving facility to ensure that continuity of care is established through confirmation that the facility can meet the needs of the patient and transfer of medical records. Patients will be directly admitted without first being seen in the ED.

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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,

A handwritten signature in black ink, appearing to read "Crystal Bloom", with a stylized flourish at the end.

Crystal Bloom

cc: E. Kelley, DPH
J. Bernice, DPH
R. Kaye, DPH
J. Gagne, DPH
J. O. Boeh-Ocansey, Jr., DPH
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