



June 26, 2020

**Via Email Only, Return Receipt Requested**

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

RE: Response to DPH Comments  
Mercy Medical Center / Providence Behavioral Health Hospital  
Reference #: 2150-138

Dear Mr. Davis:

This letter is submitted on behalf of The Mercy Hospital, Inc. (d/b/a Mercy Medical Center) ("Mercy"), located at 271 Carew Street, Springfield, MA 01104 regarding its licensed satellite campus, Providence Behavioral Health Hospital ("Providence Hospital Campus") located at 1233 Main Street, Holyoke, MA 01040 (the "Hospital" or "Providence"). Mercy Medical Center is a community hospital, serving the needs of Western Massachusetts for 150 years.

We appreciate your staff's time and professionalism in conducting the Department of Public Health's review of the plan submitted by Mercy on May 20, 2020. The following information is provided in response to the comments included in your letter dated June 5, 2020 (received June 17, 2020), and pursuant to 105 CMR 130.122(G).

As we have previously expressed, Mercy's decision to discontinue inpatient psychiatric services at Providence is not one we took lightly. Our patients are our top priority. After exploring many options and regularly reassessing whether services at Providence Hospital can be continued, sadly, we continue to find that due to significant staffing issues, we are no longer able to provide the level of safe, quality care at Providence that is required and that patients deserve. Accordingly, the Board of Directors of Mercy Medical Center and Trinity Health Of New England concluded that Providence Behavioral Health Hospital is unable to provide the level of safety and quality that is required.

While licensed for 74 inpatient psychiatry beds, Providence has regularly operated at less than 60 beds—and at times closer to 40—over the past two years. This is due to a persistent

shortage of psychiatrists that has now reached unprecedented, unsustainable and critically deficient levels. This is in addition to significant losses in nursing staff following our decision to discontinue services and the unprecedented COVID-19 public health crisis. Despite significant and ongoing recruitment efforts and arrangements with staffing agencies, we have been unable to find board-certified psychiatrists available for hire or long-term placement. This reality forced us to recognize that we simply would not be able to meet even the minimum staffing standards at Providence in order to continue care.

Mercy Medical Center remains committed to the region and to providing care that meets all regulatory requirements.

### **1. Continuing Care Until June 30, 2020**

Providence Hospital has had staffing challenges across multiple disciplines for many years and anticipated that these challenges might increase after the initial notification of our intent to discontinue psychiatric services. During the past four months, we have worked diligently every day to meet the needs of our inpatients and to sustain services.

COVID-19 significantly added to the staffing challenges at Providence Hospital, with colleagues out ill and many others not wanting to work in a setting with PUI/COVID patients. As a result, more than 40 employees on our three psychiatric units resigned their positions since March 1<sup>st</sup>, and many others transferred into other roles with the majority of these transitions creating staffing gaps starting in mid-May. In some cases, this has been with little to no notice. As a result, we implemented a staffing plan that included:

- reviewing staffing grids across all psychiatric services to see the impending gaps
- reviewing all counselor and nurse colleagues who were cross trained to other units
- reaching out to cross-trained full-time, per diem, and part-time staff to pick up additional shifts to cover gaps, including changing shifts and days
- filling gaps with other disciplines when clinically appropriate
- reaching out to a staffing agency for temp/contracted nurses with pediatric expertise

Even with this plan, starting in mid-May, it became apparent that staffing the child-adolescent unit with even one nurse 24 hours/day, 7 days/week would be impossible. A gap of 12 out of a minimum of 21 nursing shifts has existed since May 21<sup>st</sup>. Given these realities, Providence Hospital was faced with the decision to either safely discharge the one remaining adolescent patient or provide care that failed to comport with even the minimum requirements. As such, we contacted DMH on May 15<sup>th</sup> and informed them of staffing challenges associated with resignations and COVID-19. We followed up this initial communication with more specific information in an email on May 26<sup>th</sup>.

Based on the inability to staff the unit, arrangements were made on May 21<sup>st</sup> for the safe transfer of care of the one remaining adolescent on the unit to ensure treatment could

continue seamlessly. Members of the Providence social work team worked with the family of the patient to assure that all of their needs, including transportation, were addressed. This was the only patient transferred from Providence.

We have not closed the child/adolescent unit at Providence Hospital, however, at this time, we continue to be unable to find sufficient licensed qualified staff to provide care that maintains safety and compliance with applicable minimum staffing standards. Providence Hospital has continued to provide adult and geriatric psychiatric services with the remaining staff. We recognize our responsibilities to maintain inpatient psychiatric services, for both adult and pediatric populations, through June 30, 2020 and have done all within our ability to comply with this responsibility.

We continue to be in regular communication with referral sources of inpatient psychiatric services at Providence Hospital. Our staff in the Clinical Assessment Center continue to work closely with other hospitals and the Behavioral Health Network to understand bed availability and to ensure that patients in need are connected to the appropriate resources. We continue to maintain a daily inventory of available beds in the region to assist with patient placement. We also plan to do a comprehensive communication to referral sources, as well as inpatient and community based providers on June 30<sup>th</sup>.

## **2. Bed Availability at Alternate Sites**

According to analysis of the most recent inpatient utilization data available, there remains a sufficient number of adult and geriatric inpatient psychiatric beds available in the region upon closure of the beds at Providence.

Mercy Medical Center, through its affiliation with Trinity Health Of New England, is committed to ensuring that our region's patients continue to receive necessary inpatient psychiatric care. Trinity Health Of New England hospitals—Mt. Sinai in Hartford, CT and Johnson Memorial in Stafford Springs, CT—have significant inpatient psychiatric capacity. To ensure that patients in the community have access to these expanded inpatient psychiatric services, Trinity has successfully negotiated contracts with the vast majority of managed care organizations and health insurers that are used by patients in our community, including Beacon Health Strategies and the Massachusetts Behavioral Health Partnership.

Patients assessed in Mercy Medical Center's Emergency Department ("ED") as needing inpatient treatment will be stabilized and transferred via ambulance to the closest available bed, with the majority of such cases anticipated to be referred to one of the following facilities (the information below includes 2019 utilization data, except when noted otherwise):

Hospital	City	State	Service Type	Beds / Utilization
Baystate Medical Center	Springfield	MA	Adult	28 / 98%
Holyoke Medical Center	Holyoke	MA	Adult	20 / 89%
Baystate Noble	Westfield	MA	Adult	20 / 60%
Johnson Memorial Hospital	Stafford Springs	CT	Adult	20 / 64%
Baystate Wing	Palmer	MA	Older Adult	28 / 81%
Mt. Sinai Hospital (FY20)	Hartford	CT	Adult Pediatric	62 / 56% 23 / 49%
Hebrew Senior Care	West Hartford	CT	Older Adult	38 / 90%
Harrington Hospital	Southbridge	MA	Adult	14 / 76%
Hospital for Behavioral Medicine (FY20)	Worcester	MA	Adult Older Adult Pediatric	48 / 80% 14 / 80% 20 / 80%
Brattleboro Retreat (FY20)	Brattleboro	VT	Adult Pediatric	89 / 79% 30 / 82%
TaraVista (FY20 through March)	Devens	MA	Adult Pediatric	96 / 95% 12 / 75%

### 3. Insurance Plans Accepted

As we have reported, part of our plan to help patients in greater Springfield continue to access inpatient psychiatric care after June 30 includes the use of other hospitals within our Trinity Health Of New England system: Mt. Sinai Hospital in Hartford, and Johnson Memorial Hospital in Stafford Springs. Both hospitals have significant inpatient psychiatric capacity, including child and adolescent beds at Mt. Sinai. We have worked to secure payor contracts for adult, pediatric inpatient psychiatric care at Mt. Sinai Hospital and adult inpatient psychiatric care at Johnson Memorial Hospital. We have had success for the vast majority of our payor contracts, including agreements with those patients covered by Medicaid through Beacon Health Strategies and recently the Massachusetts Behavioral Health Partnership.

Thank you for your attention to this matter. If you have any questions, or require any additional information, please do not hesitate to contact me.

Sincerely,



Deborah Bitsoli, President  
Mercy Medical Center and its affiliates

Sincerely,



Dr. Robert Roose, Chief Medical Officer  
Mercy Medical Center

cc: J. Mikula, DMH  
J. Ross, DMH  
E. Kelley, DPH  
S. Lohnes, DPH  
W. Mackie, DP  
R. Rodman, DPH