

Ms. Elizabeth Kelly
Director
Determination of Need Program
250 Washington Street, 6th Floor
Boston, MA 02108

CERTIFIED RETURN RECEIPT

Dear Ms. Kelly:

Pursuant to an Order issued by the Commissioner of Public Health, a Notice of Determination of Need shall not be required for any person seeking approval for a Substantial Capital Expenditure, Substantial Change in Service, or Transfer of Site necessary to address COVID-19, provided the person seeking approval complies with the Department of Public Health ("DPH") guidance.

Holyoke Medical Center ("HMC") is seeking approval, per the DPH guidance in a memorandum dated March 24, 2020 from Margo Michaels MPH, for a Substantial Change in Service related to the COVID-19 State of Emergency. The proposed project includes the modification of two (2) existing inpatient units to meet the critical shortage of behavioral health beds with the closure of Providence Behavioral Hospital, to reduce the boarding of psychiatric patients in the Emergency Department, to reduce the risk of these patients contracting COVID-19, and to meet the demand associated with the increased stress and anxiety caused by COVID-19.

HMC proposes to increase its adult inpatient psychiatric bed capacity from the current twenty (20) beds to thirty-eight (38) and create a nine (9) bed child and adolescent unit. In order to accommodate the needed increase in psychiatric beds, HMC is seeking approval to expand behavioral health beds and modify two (2) existing inpatient units by performing construction to meet the facility regulatory requirements of the Department of Public Health and Department of Mental Health (See Attached: Design First Floor Draft Adult.pdf; Design Third Floor Draft Peds.pdf). The projected cost of the proposed project is \$6,300,000. HMC estimates a six (6) month completion from project approval.

The expansion of HMC's behavioral health bed capacity has now become an urgent need as the COVID-19 pandemic continues to have a devastating impact in our community and the country. In FY 2019, HMC had documented over 10,400 visits in our Emergency Department for behavioral health related problems. With Providence Behavioral Health Hospital's closure of seventy-four (74) beds dedicated to adult, geriatric, and child and adolescent inpatient psychiatric services as of June 30, 2020, at a time when HMC's own adult unit has been at 100% capacity and resources have been fully stretched in our efforts to battle COVID-19, what we believed previously to be necessary to meet the needs of our community is now a most critical need for both the community and HMC.



Holyoke Medical Center

From July - September, psychiatric boarders in our Emergency Department increased by 57% over the previous six-month average. Admissions to our existing inpatient unit have increased by an average of 25% in July, August, and September over the previous six-month average and is 32% higher than our 2019 average admission numbers. Length of stay has fallen by over a day as physicians respond to added placement pressures created by the increase in Emergency Department psychiatric boarders. The pace continues to increase during the current month of October and with the continued anxiety and depression associated with COVID-19, HMC is bracing for a new surge in behavioral health visits to our Emergency Department. Preliminary evidence suggests some groups are more vulnerable than others to the psychosocial effects of this pandemic. In particular, people who contract the disease, those at heightened risk for it (including the elderly, people with compromised immune function, and those living or receiving care in congregate settings, children and adolescents), and people with preexisting medical, psychiatric, or substance use problems are at increased risk for adverse psychosocial outcomes. In the Washington Post, May 4, 2020, article entitled [The Coronavirus Pandemic Is Pushing American into a Mental Health Crisis](#), federal agencies and experts warn that a historic wave of mental health problems is fast approaching: depression, substance abuse, post-traumatic stress disorder, and suicide. A recent Kaiser Family Foundation Poll found that nearly half of Americans contacted reported the coronavirus is negatively impacting their mental health in some discernable manner. A federal agency hotline for people in emotional distress, referenced in the Washington Post article, registered a 1000% increase in April 2020, compared to the same month last year.

Providing care for people seeking treatment for possible COVID-19, and patients who are acutely ill or injured is proving to be especially challenging for our health care practitioners as the number of adult and pediatric psychiatric boarders continues to rise on a month-to-month basis. Each additional day that a psychiatric patient remains boarded in the Emergency Department increases the risk for potential COVID-19 exposure.

HMC recognized the community's need for additional psychiatric beds well over one year ago and before the current emergency. HMC based our analysis, among other variables, on our review of community population demographics, the steady rise in the volume of psychiatric assessments, the increasing acuity and chronicity of the psychiatric patients seen, and through monitoring the psychiatric overflow rates from our secure six (6) bed psychiatric assessment area into our main Emergency Department patient treatment areas. HMC formally submitted a Determination of Need Application, on September 19, 2020, to build a modern 68,000 square foot Behavioral Health Pavilion located on a two (2) acre parcel currently owned by HMC as a long-term strategy. However, the new pavilion will take 18 to 24 months to build once all approvals are received from local and state regulatory agencies. HMC is submitting this letter seeking approval and support in granting HMC the permission to expedite its plans for the needed expansion of inpatient psychiatric beds through the modification of two (2) existing inpatient units as an interim solution to reduce the psychiatric boarding issues



Holyoke Medical Center

within the Emergency room while reducing the risks to COVID-19 exposure for this vulnerable patient population. HMC has a long, demonstrable commitment to providing behavioral health to the community. The closing of Providence Behavioral Health's services has significantly reduced the number of needed behavioral health beds while also in the midst of the most challenging public health epidemic of our lifetime. Through this Proposed Project, HMC is seeking approval for what is required to maintain our behavioral health commitment. HMC cannot deliver those services without an expansion of our physical space and an increase in our psychiatric bed capacity. With the uncertainty of a second wave of COVID-19, the shortage of behavioral health inpatient beds in the region, and the continual increase in Emergency Department boarding for long periods of time, the public health will be measurably harmed. HMC is asking for your help in granting us the necessary approval to move forward with this Proposed Project.

The undersigned certifies under the pains and penalties of perjury that Holyoke Medical Center will modify its existing facilities to the Department of Public Health and Department of Mental Health regulations with the intention of being used for the management and treatment of psychiatric patients to reduce Emergency Department boarding, reducing the risk and exposure to COVID-19 as well as addressing the increased demand related to the COVID-19 pandemic.

Please do not hesitate to contact me upon receipt of this letter.

Sincerely,

Spiros Hatiras
President and CEO