

December 11, 2020

<u>Via E-Mail</u>

Lara Szent-Gyorgyi, MPH Director, Determination of Need Program Department of Public Health 250 Washington Street Boston, MA 02511

Re: <u>VHS Acquisition Subsidiary Number 9, Inc. d/b/a MetroWest Medical Center –</u> <u>Application to Add Psychiatric Beds at Leonard Morse Campus Pursuant to Order of the</u> <u>Commissioner of Public Health Regarding Determination of Need Approvals Related to</u> <u>COVID-19</u>

Dear Ms. Szent-Gyorgyi:

Pursuant to the Order of the Commissioner of Public Health Regarding Determination of Need Approvals Related to COVID-19, issued on March 24, 2020, and the Updated Guidance for Requesting Determination of Need (DoN) Approval for projects related to COVID-19 during the State of Emergency, issued on November 24, 2020, VHS Acquisition Subsidiary Number 9, Inc. ("the Applicant") respectfully requests that the Department of Public Health ("DPH") approve the addition of 17 inpatient psychiatric beds, including 14 adult psychiatric beds and 3 pediatric psychiatric beds, by MetroWest Medical Center ("MWMC") at its Leonard Morse Campus ("LMC"), located at 67 Union Street, Natick, MA 01760, to address the needs of its patient panel ("Proposed Project").

On March 10, 2020, Governor Baker declared a State of Emergency in response to an outbreak of the novel coronavirus 2019 ("COVID-19").<sup>1</sup> As the Massachusetts Department of Public Health and the Determination of Need program have indicated, individuals with a psychiatric disorder are at higher risk for negative outcomes related to COVID-19.<sup>2</sup> Moreover, insufficient capacity of

<sup>&</sup>lt;sup>1</sup> Exec. Order No. 591: Declaration of a State of Emergency to Respond to COVID-19 (Mar. 10, 2020), https://www.mass.gov/executive-orders/no-591-declaration-of-a-state-of-emergency-to-respond-to-covid-19.

<sup>&</sup>lt;sup>2</sup> Updated Guidance: Requesting Determination of Need (DoN) Approval for projects related to COVID-19 during the State of Emergency (Nov.24, 2020). See also Maxime Taquet et al., *Bidirectional Associations Between COVID-19 and Psychiatric Disorder: Retrospective Cohort Studies of 62,354 COVID-19 Cases in the USA*, THE LANCET (Nov. 9, 2020), https://www.thelancet.com/journals/lanpsy/article/PIIS2215-0366(20)30462-4/ful/text; Nirmita Panchal et al., *The Implications of COVID-19 for Mental Health and Substance Use*, KFF (Aug. 21, 2020), https://www.kff.org/health-reform/issue-brief/the-implications-of-covid-19-for-mental-health-and-substance-use/.

17 inpatient psychiatric beds, consisting of 14 adult psychiatric beds and 3 pediatric psychiatric beds, at LMC to respond to the needs of its patients during this public health emergency.

The cost associated with the Proposed Project is \$3,967,287, which includes construction and renovation to the space to accommodate the new inpatient psychiatric beds.

We thank you for our attention to this matter. Please feel free to contact me or Andrew Levine, Esq. at 617-462-2676 if you have any questions or require any additional information.

Sincerely, Collins

Ava Collins Chief Executive Officer

cc: Andrew Levine, Esq. Sherman Lohnes, Esq., DPH Rebecca Rodman, Esq., DPH Janet Ross, DMH Tyler Williams, Esq., Tenet