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May 27, 2021

Lara Szent-Gyorgyi, Director
Determination of Need Program
Department of Public Health
250 Washington Street
Boston, MA 02108

Re: BMC Health System, Inc. - Request for Determination of Need Approval for Inpatient Psychiatry and Substance Use Disorder Project Related to the COVID-19 State of Emergency

Dear Ms. Szent-Gyorgyi:

In accordance with 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, BMC Health System, Inc. respectfully requests approval from the Department of Public Health for the addition of fifty-six (56) inpatient adult psychiatry beds, which will be located with a twenty-six (26) bed clinical stabilization service unit at a new site to be established as a satellite location of Boston Medical Center (the "Project"). The Project will be located at 34 North Pearl Street in Brockton. BMC Health System, Inc. seeks approval for the Project in order to address the ongoing needs of its patients in connection with the COVID-19 pandemic.

On March 10, 2020, Governor Charles D. Baker issued a declaration that a public health emergency exists in the Commonwealth due to the outbreak of SARS-CoV-2 ("COVID-19").¹ The Determination of Need Program and the Massachusetts Department of Public Health have acknowledged that individuals with psychiatric disorders are at an increased risk for negative outcomes associated with COVID-19.² During the COVID-19 pandemic and the public health

¹ Order No. 591: Declaration of a State of Emergency to Respond to COVID-19 (March 10, 2020), <https://www.mass.gov/news/declaration-of-a-state-of-emergency-to-respond-to-covid-19>

² Updated Guidance: Requesting Determination of Need (DoN) Approval for projects related to COVID-19 during the State of Emergency (November 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 (November 9, 2020), [https://www.thelancet.com/journals/lanpsy/article/PIIS2215-0366\(20\)30462-4/fulltext](https://www.thelancet.com/journals/lanpsy/article/PIIS2215-0366(20)30462-4/fulltext); Nirmita Panchal et al., *The Implications of COVID-19 for Mental Health and Substance Use*, KFF (August 21, 2020) <https://www.kff.org/coronavirus-covid-19/issue-brief/the-implications-of-covid-19-for-mental-health-and-substance-use/>.

emergency, the length of boarding times in Emergency Departments has increased³ along with the number of psychiatric patients requiring inpatient admission. Accordingly, regional and statewide demand for psychiatric beds has far exceeded available beds during the pandemic – indicating an ever-increasing need for additional psychiatric bed capacity, especially to serve MassHealth patients. The pandemic has also exacerbated the need for substance use disorder treatment services across the Commonwealth. BMC Health System, Inc. is seeking to help remediate this need by quickly bringing into service the twenty-six (26) clinical stabilization service substance use disorder treatment beds as part of this Project.

BMC Health System, Inc.'s patients belong to the populations most adversely affected by COVID-19, suffering particularly from the physical and psychiatric effects of COVID-19. Boston Medical Center continues to treat a steady and disproportionate volume of inpatients diagnosed with COVID-19 along with inpatients who are medically and psychiatrically more acutely ill compared to pre-pandemic conditions. There is a disproportionate number of behavioral health conditions across BMC Health System's patients. Approximately 48% of BMC HealthNet Plan participants have a diagnosis for a behavioral health condition, compared to approximately 30% of MassHealth members overall. Among inpatients at Boston Medical Center who test positive for COVID-19, approximately 30% also had a behavioral health diagnosis.

BMC Health System, Inc. has determined that a significant need for inpatient psychiatric beds and more clinically intense levels of substance use disorder care will exist post-pandemic, especially since many patients delayed needed medical care during the COVID-19 surges. BMC Health System, Inc. has seen that the type of care that its patients have put off includes care for ongoing or new behavioral health issues.

The projected costs for the Project are \$21,000,000, comprised largely of renovation costs necessary to outfit the building for fifty-six (56) inpatient psychiatry beds and twenty-six (26) clinical stabilization service beds.

We thank you for your consideration of our request to approve this Project. Please do not hesitate to contact Nicole Sexton at Nicole.Sexton@bmc.org or me if you have any questions or require additional information regarding our request.

Sincerely,



Kathleen E. Walsh
President & Chief Executive Officer
BMC Health System, Inc.

³ Lynn E. Delisi, *COVID-19 Pandemic: Impact on psychiatric care in the United States*, 289 PSYCHIATRIC RES. 113069 (2020); *Hospital Emergency Room Wait Times Increasing for People in Need of Psychiatric Care*, MASSLIVE (October 11, 2020) <https://www.masslive.com/news/2020/10/er-wait-times-up-for-psychiatric-patients-needing-admittance.html>

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