



August 14, 2024

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

Re: MAMH Written Testimony RE: Carney Hospital

Dear Director Davis:

On behalf of the Massachusetts Association for Mental Health (MAMH), thank you for your leadership considering Steward Health Care System's notification of its intent to close Carney Hospital. We offer written testimony in deep concern for the impact this closure would have on individuals with mental health conditions and their families living in Dorchester, Mattapan, and the surrounding neighborhoods.

As an alternative to closing Carney Hospital, MAMH recommends that the hospital be bid to a Massachusetts behavioral health provider to operate: 1) acute psychiatric beds, and 2) beds for men that are involuntarily committed under Section 35 for substance use conditions.

Formed over a century ago, MAMH is dedicated to promoting mental health and well being, while preventing behavioral health conditions and associated disability. We are committed to advancing prevention, early intervention, effective treatment, and research for people of all ages. We seek to eliminate stigma and discrimination and advance full inclusion in all aspects of community life. This includes discrimination affecting not only people with behavioral health conditions, but also people who face unequal burdens and barriers to the protections and benefits of citizenship due to their race, ethnicity, gender identity, or disability status. MAMH has a demonstrated record of furthering its mission by convening stakeholders across the behavioral health and public health communities; disseminating emerging knowledge; and providing subject matter expertise to inform public policy.

Carney Hospital has 50 licensed psychiatric beds (20 adult beds, 16 geriatric beds, and 14 adolescent beds).¹ The closure of these beds would lead to a severe shortage of psychiatric beds in the region. In Steward Health Care System's letter to you dated August 5, 2024 (Carney notice of intent to close #2), Steward lists 11 other hospitals in the region that are available to patients currently served by Carney Hospital. However, only one of those hospitals has adolescent beds (Bournewood Hospital in Chestnut Hill) and only two of those hospitals have geriatric beds (St. Elizabeth's Medical Center in Brighton and Mount Auburn Hospital in Cambridge). The closing of Carney Hospital would have an impact on access to acute treatment for all psychiatric patients, and adolescents and older adults in particular.

Steward Health Care System's letter to you dated August 5, 2024 (Carney notice of intent to close #2), also notes that Carney Hospital's psychiatric beds had, on average, 68 percent occupancy in the first six months of calendar year 2024. While this is the highest occupancy rate across all types of beds at Carney Hospital, failure to achieve a 100 percent occupancy rate for psychiatric beds in Massachusetts hospitals is more of a reflection of behavioral health workforce shortages than the actual demand for behavioral health beds. As you well know, the Commonwealth is experiencing a behavioral health boarding crisis. As of August 5, there were 309 behavioral health patients (235 adult, 52 geriatric, 22 pediatric) boarding in hospital emergency departments (EDs) and medical-surgical units across the state, ready for discharge but "stuck" because of lack of appropriate, therapeutic placements, including beds in psychiatric acute hospitals and units.ⁱⁱ The closure of Carney Hospital will further exacerbate the boarding crisis.

The closure of Carney Hospital is also, most importantly, detrimental for individuals with mental health conditions and their families living in Dorchester, Mattapan, and the surrounding neighborhoods. Patients will now need to travel to hospitals further from their homes, communities, and support systems to get the acute psychiatric care that they need. For family and friends looking to visit, navigating city traffic and/or public transportation can be burdensome, time consuming, and expensive. Visits from loved ones can provide crucial emotional support to individuals who are hospitalized and can help support a successful transition to home or a lower level of care upon discharge.

It's finally important to note that the Carney Hospital generally serves communities with higher percentages of Black and Brown individuals compared to the state as a whole. For instance, 86.1 percent of all residents in Mattapan identify as Black or African American. There are also a greater percentage of Asian residents living in Quincy and the 02125 and 02122 zip codes in Dorchester compared to statewide averages.ⁱⁱⁱ Black and Brown communities already face disproportionate barriers to mental health services. Among adults with mental health conditions, Hispanic (40%), Black (38%), and Asian (36%) adults are less likely than White adults (56%) to receive mental health care.^{iv} The closure of Carney Hospital will further compound these racial and ethnic inequities.

As an alternative to closing Carney Hospital, MAMH recommends that the hospital be bid to a Massachusetts behavioral health provider to operate: 1) acute psychiatric beds; and 2) beds for men who are civilly committed for involuntary treatment for alcohol and substance use conditions under M.G.L. c. 123 § 35 (Section 35). The continued operation – and potential addition – of psychiatric beds for adults, older adults, and adolescents will address all the concerns listed above. Likewise, expanding Section 35 treatment capacity for men in a setting administered by the Department of Public Health (DPH) or the Department of Mental Health (DMH) will help to move the Commonwealth away from its current practice of sending these men to carceral facilities. Massachusetts is the only state in the country that commits men with alcohol or substance use conditions to prisons and jails when there are not enough beds elsewhere. The harsh and punitive environments of carceral facilities are traumatizing and not conducive to recovery. Repurposing the Carney Hospital facility to expand the Commonwealth's acute psychiatric bed capacity and to help end the antiquated and stigmatizing practice of sending men with substance use conditions to carceral facilities offers an important opportunity to expand mental health and substance use treatment capacity to address unmet needs.

Thank you again for your leadership and consideration of this testimony. MAMH looks forward to working closely with the Department and serving as a resource for your consequential work.

Sincerely,



Jessica Larochelle, MPH
Co-Director for Public Policy and Government Relations

cc: The Honorable Brandy Fluker Oakley
The Honorable Ruth Balsler
The Honorable Nick Collins
The Honorable Cindy Friedman

ⁱ MA Department of Mental Health (DMH). DMH Licensed Hospitals. 5 August 2024. Available at: <https://www.mass.gov/doc/dmh-licensed-hospital-list-1/download>. The

ⁱⁱ MA Health and Hospital Association. Capturing a Crisis: Weekly Behavioral Health Boarding Reports. 5 August 2024. Available at: <https://www.mass.gov/doc/carney-notice-of-intent-to-close-2-pdf-carney-hospital/download>.

ⁱⁱⁱ Carney Hospital. Carney Hospital Community Benefits Report. 2020. Available at: https://content.steward.org/sites/default/files/inline-files/AGO-CB_%20Implementation%20Strategy%20-%207_9_2021%20-%20CARNEY%20HOSPITAL%20-%207_9_2021.pdf.

^{iv} Kaiser Family Foundation. Key Data on Health and Health Care by Race and Ethnicity. 11 June 2024. Available at: <https://www.kff.org/key-data-on-health-and-health-care-by-race-and-ethnicity/?entry=executive-summary-introduction>.