



August 19, 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: Nashoba Valley Medical Center

Dear Director Davis:

On behalf of the Massachusetts Association for Mental Health (MAMH), thank you for your leadership in considering Steward Health Care System's notification of its intent to close Nashoba Valley Medical Center. We offer written testimony in deep concern for the impact this closure would have on individuals with mental health conditions and their families. **With the closure of Nashoba Valley Medical Center, MAMH is particularly concerned about the loss of capacity to support older adults with mental health conditions in community in north central Massachusetts. We strongly encourage the MA Department of Public Health (DPH) to ensure that the geriatric inpatient bed capacity that will be lost with the closure of Nashoba is replaced by another behavioral health facility in the region.**

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.

Nashoba Valley Medical Center has 20 licensed geriatric psychiatric beds.ⁱ The closure of these beds would lead to a severe shortage of psychiatric beds for older adults in the region. In Steward Health Care System's letter to you dated August 5, 2024 (Nashoba notice of intent to close #2), Steward lists five other hospitals in Massachusetts that are available to patients currently served by Nashoba Valley Medical Center – UMass Memorial Health Alliance at Leominster, Emerson Hospital, Holy Family Hospital at Methuen, St. Elizabeth's Medical Center, and Lowell General Hospital. However, only one of these hospitals has geriatric beds (St. Elizabeth's Medical Center in Boston – 15 geriatric beds). St. Elizabeth's is 35 miles from Nashoba Valley and approximately an hour drive (without traffic).

Steward Health Care System's letter to you dated August 5, 2024 (Nashoba notice of intent to close #2), also notes that Nashoba Valley Medical Center's psychiatric beds had, on average, 70 percent occupancy in the first six months of calendar year 2024. While this is the highest occupancy rate across all types of beds at Nashoba, 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.ⁱⁱ The closure of Nashoba will further exacerbate the boarding crisis.

The closure of Nashoba is also, most importantly, detrimental for individuals with mental health conditions and their families living in Ayer and the north central Massachusetts region. 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. We note that placing older adults with complex medical-psychiatric needs in medical beds with psychiatric consultation is often not appropriate. Inpatient geriatric psychiatry units provide complete medical workups, structured cognitive assessments, age-sensitive aftercare referrals, and monitoring of psychopharmacological side effects and blood levels.ⁱⁱⁱ

Likewise, for family and friends looking to visit, navigating long distances and traffic can be prohibitive. 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.

With the closure of Nashoba Valley Medical Center, MAMH is particularly concerned about the loss of capacity to support older adults with mental health conditions in community in north central Massachusetts. We strongly encourage DPH to ensure that the geriatric inpatient bed capacity that will be lost with the closure of Nashoba is replaced by another behavioral health facility in the region. We are particularly concerned about the risk of unnecessary nursing home admissions for older adults with psychiatric needs who otherwise would have received care at 20 bed unit at Nashoba Valley Medical Center. This is contrary to the Commonwealth's efforts under the Marsters settlement agreement to move older adults and people with disabilities out of nursing homes and into community-based settings.^{iv} We urge DPH to ensure that the closure of Nashoba does not have the unintended consequence of eroding the Commonwealth's progress in supporting community-based care.

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 Danillo Sena
The Honorable James Eldridge

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 Yazgan, I. C., Greenwald, B. S., Kremen, N. J., Strach, J., & Kramer-Ginsberg, E. (2004). Geriatric Psychiatry Versus General Psychiatry Inpatient Treatment of the Elderly. *American Journal of Psychiatry*, 161(2), 352–355. <https://doi.org/10.1176/appi.ajp.161.2.352>.

^{iv} MA Executive Office of Health and Human Services. Agreement Reached in Class Action Lawsuit to Expand Opportunities for Individuals in Nursing Homes to Return to Community. 16 April 2024. Available at: <https://www.mass.gov/news/agreement-reached-in-class-action-lawsuit-to-expand-opportunities-for-individuals-in-nursing-homes-to-return-to-community>.