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December 27, 2021

VIA ELECTRONIC MAIL

Office of Commissioner Jan Malcolm
Minnesota Department of Health
625 North Robert Street
St Paul, MN 55155

Dear Commissioner Malcolm:

Thank you for the opportunity to submit comments to the Minnesota Department of Health related to the letter of intent from Fairview Health Services to seek a license to operate a 120 bed inpatient mental health hospital for adults in the East Metro area of the Twin Cities. Our understanding is that a new facility would be built on the former Bethesda Hospital site, in partnership with publicly traded Acadia Healthcare.

Regions Hospital is a major provider of mental health inpatient care in the east metro, serving patients regardless of ability to pay for these services. We recently opened an additional 20 beds, bringing our total mental health inpatient bed capacity to 120. We are proud of the longstanding commitment to caring for persons with mental illness in our community, in partnership with many organizations. HealthPartners and Regions Hospital have convened and participated in the East Metro Mental Health Roundtable since 2003, and appreciate the interconnectedness of preventive, crisis and acute care services that are in short supply in our region. The construction of a new facility or transfer of mental health beds or services within Fairview would have an impact on hospitals providing inpatient care. With additional information we will be better able to tailor input on any associated care delivery and access impacts. These are some introductory questions that will help shape our future response:

Will the current inpatient beds at St. Joseph's Hospital remain open at full capacity until the new facility opens in the future? Any reduction will have a major impact on patient access to a range of services.

Will the new facility be open to all patients, including those without insurance, those on fee for service Medicaid, and those enrolled in prepaid Medical Assistance?

Due to the shortage of bed capacity in the east metro, and the closure of the St. Joseph's emergency room in 2021, the hospitals work very closely together on capacity issues, noted even more during the pandemic. Will there be an emergency room to access services, and if not, how will patients access care if they are not already in the system?

Will the new facility and care model be able to serve persons with co-existing medical and psychiatric conditions? If the facility does not provide medical care, patients could end up needing to be transferred to other east metro hospitals for that care, thus disintegrating their medical and psychiatric care plans.

Will the new facility be able to accept patients from law enforcement personnel at all times and other emergent transfers?

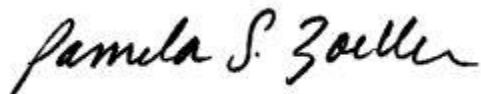
What other resources and services for persons with mental illness will the new facility provide besides inpatient care?

Will the new facility share the east metro patients awaiting transfers to MN State Operated Services?

How will Fairview Health Systems meet the workforce demands to staff the facility?

There are opportunities to improve access in the east metro through collaboration between hospitals, nonprofit providers, counties and the State of Minnesota, and much groundwork has been laid with programs such as the East Metro Mental Health Crisis Alliance. It would be our hope that this new facility will partner with these organizations and help address the gaps we've collectively identified. We look forward to working with our partners in mental health care and with Fairview Health Services as we learn more about how this new hospital will serve patients in our east metro area. We will appreciate the opportunity to comment further as the public interest review process proceeds forward.

Sincerely,

A handwritten signature in black ink that reads "Pamela S. Zoeller". The signature is written in a cursive, flowing style.

Pam Zoeller
Vice President, Specialty Care
HealthPartners