

March 8, 2022

Senator Paul Utke
95 University Avenue W.
Minnesota Senate Bldg., Room 3403
St. Paul, MN 55155

Re: SF3248

Dear Chair Utke and members of the Committee,

Thank you for the opportunity to provide comments on SF 3248 (Rosen) that would allow Fairview Health Services/Acadia Healthcare to build an adult mental health hospital in Saint Paul through an exemption to Minnesota's hospital bed moratorium law.

We remain supportive of the legislative and public interest review process as a way to provide policymakers with additional perspectives as they evaluate the Fairview proposal within the context of their existing capacity as well as the community's needs. While we understand that this process can be resource intensive, it creates an important dialogue among stakeholders and policy makers about the impacts of adding resources into the health care system.

Access to adolescent, adult and geriatric inpatient mental health services remains a critical need across the state. We reviewed the publicly posted proposal and are pleased to see the range of services for adults the new mental health hospital will provide. However, we have some concerns with the closed access model of care. Most notably, the new mental health hospital will not have an emergency department (ED), which eliminates an access point to receive care for people in crisis in the east metro, regardless of their insurance status. United Hospital is already an extremely busy ED and with the closure of St Joe's ED in 2020, United Hospital ED saw a 12% increase in overall volume and a disproportionate increase of 21% in mental health volume in 2021. Additionally, the proposed model will not address all patient care needs on site. With no medical/surgical services, patients in need of serious medical attention will need to be transported to an ED for care.

The pandemic and workforce challenges have frequently pushed our hospitals to capacity and these challenges are expected to continue for the foreseeable future. Fairview is planning to close the remaining 40 mental health beds at St. Joe's in June 2022, leaving a net loss in available beds until the new facility opens in 2023 or 2024. Even a temporary loss of inpatient mental health beds in the east metro increases the possibility of mental health patients boarding in our EDs, a situation we are already desperately trying to address as it is not in the best interest of the patient in crisis and prevents other patients' access to care.

To truly meet the needs of the community, as well as maintain the spirit of collaboration the health care systems have built in the east metro, we recommend that any approved proposal should ensure there is a robust plan to care for patients in crisis, as well as patients from outside the Fairview referral system, regardless of their insurance status. This includes a clear admitting protocol, including an interfacility agreement, with other healthcare systems to ensure access. Fairview should also maintain their existing bed capacity at St. Joe's until the new hospital opens, eliminating the gap in access to beds. It is critically

important there are mitigation efforts in place during the transition to this new facility and model of care to minimize pressures on the remaining hospitals in the east metro.

We are confident that a solution can be found that prioritizes the needs of the community and balances the interests of all stakeholders.

Sincerely,

A handwritten signature in black ink, appearing to read "Sara Criger".

Sara Criger
Senior Vice President of Operations
President, United and Mercy Hospitals
Allina Health

A handwritten signature in blue ink, appearing to read "Joe Clubb MSW LISCSW".

Joe Clubb, MSW, LISCSW
Vice President, Operations, Mental Health and Addiction
Allina Health

A handwritten signature in brown ink, appearing to read "Brian Palmer MD".

Brian Palmer, MD
Vice President, Operations, Mental Health and Addiction
Allina Health