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June 23, 2022

**Re: Fairview Health Services/Acadia Healthcare Mental Health Hospital Proposal**

Dear Mr. Gildemeister,

Thank you for the opportunity to provide comments through the public interest review process on the proposal submitted by Fairview Health Services and Acadia Healthcare to establish a 144-bed adult mental health hospital in St. Paul.

As you know, access to mental health services remains a critical need, including capacity across the continuum of care, at state facilities, inpatient and outpatient services and an adequate workforce of trained mental health professionals to meet the demand of the state and our communities. While we continue to serve our patients within the existing mental health infrastructure, we have ongoing challenges finding appropriate beds to safely discharge patients out of our hospitals, both when a patient needs a higher level of care or an outpatient treatment facility or program. Additionally, we continue to see mental health patients boarded in our emergency departments awaiting inpatient beds.

While we support the addition of inpatient mental health and substance abuse disorder treatment bed capacity, we have concerns with patient and provider access to the beds and the potential impact on an already strained mental health workforce. It is critical to maintain care delivery regardless of a patient's ability to pay, including in this new facility. Without an emergency department, this facility is not subject to the same regulations as an acute care hospital and while we appreciate the legislature's thoughtful addition to the language around the hospital accepting patients by ambulance, transfers, and walk-up patients, we hope the department will remain diligent in ensuring compliance to these criteria is maintained.

Similarly, we experience as the other health systems in the State do significant challenges in recruiting and retaining providers for the existing services, including inpatient psychiatric beds and the necessary ancillary services. Without a plan and commitment to increase the overall workforce availability along with the new inpatient beds, the resource and talent challenges we all face today will only be worse.

As we welcome the needed services in our state, we expect this project with a majority ownership stake held by a publicly traded company to uphold our current providers' commitment to delivering care to all Minnesotans. In addition, we expect a commitment to investing back into the community, including but not limited to investments in community benefits, charity care

and financial assistance programs. We hope Fairview and Acadia will be thoughtful in minimizing the transition time to the new facility and closing St. Joe's inpatient mental health beds that could result in additional strain during the transition and even more patients boarded in emergency departments across metro hospitals.

Again, thank you for the opportunity to comment on this project. We welcome additional capacity to these services and look forward to continuing to partner with the state and other providers to ensure we minimize the impact of the transition to the new hospital and ensure access to care for all Minnesotans.

Please feel free to reach out with any additional questions.

Sincerely,



Andrew S. Cochrane  
Chief Hospital Officer, North Memorial Health

*North Memorial Health (NMH) is a health system with 2 hospitals, North Memorial Health Hospital and Maple Grove Hospital, and over 25 associated clinics including primary, specialty, and urgent care and an expansive statewide medical transportation division. We employ over 6,000 team members, serving over 55,000 customers per month.*