



Maryland
Hospital Association

September 5, 2018

Barbara Bazron, PhD
Deputy Secretary, Behavioral Health Administration
Maryland Department of Health
201 West Preston Street
Baltimore, Maryland 21201

Dear Dr. Bazron,

On behalf of the 63 hospital and health system members of the Maryland Hospital Association, I appreciate the opportunity to provide input on inpatient psychiatric bed capacity, as required by the 2018 Joint Chairmen's Report.

The Behavioral Health Administration's analysis of Acute General Hospital Psychiatric Capacity and Utilization (attached), is limited in its ability to truly capture Maryland's behavioral health treatment capacity and demand. The analysis, which draws on Maryland Health Care Commission and Health Services Cost Review Commission data, calculates occupancy based on *licensed* beds, a method that overstates actual capacity. Any analysis of inpatient psychiatric occupancy should instead use the number of *staffed* beds available to each facility. Staffed beds, defined by the Maryland Health Care Commission, are "the number of beds regularly maintained (set up and staffed for use) for inpatients." Numerous hospitals are unable to treat patients due to staffing shortages, patient characteristics, and other factors that are unrelated to the raw number of licensed beds.

In addition, to fully measure the state's demand for treatment, any analysis must capture more than just inpatient psychiatric services, as a significant portion of treatment is now conducted in other inpatient units and outpatient settings.

MHA has conducted an internal analysis to measure demand for inpatient behavioral health services in the 29 Maryland hospitals licensed to provide inpatient psychiatric services in fiscal 2017. Claims data were used to identify patients with a behavioral health primary diagnosis, including those with substance use disorders. Through this analysis, MHA estimates that these 29 hospitals provided approximately 80,000 more inpatient days of care, bringing the total to approximately 245,000. Please note that this analysis covers all units for the 29 hospitals with inpatient psychiatric services; however, because the analysis excludes hospitals without psychiatric units that may be treating behavioral health patients admitted to the hospital through the emergency department, we believe it is still conservative.

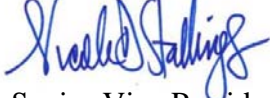
Currently, MHA is completing a study to identify the primary factors for discharge delays in inpatient psychiatric units, to better understand the behavioral health needs of Maryland's communities. We would be happy to share a preview of these findings.

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Thank you again for the opportunity to provide feedback. I look forward to continuing to work together on this important issue.

Sincerely,

Nicole Stallings



Senior Vice President, Government Affairs

Table 4: Acute General Hospital Psychiatric Capacity and Utilization

	Total Number of Psych. Discharges		Total Psych. Day		Avg. Length of Stay		Beds		Occupancy Rate	
	FY13	FY17	FY13	FY17	FY13	FY17	FY13	FY17	FY13	FY17
Bon Secours Hospital	1,690	1,287	8,864	6,798	5	5	32	24	76%	78%
Calvert Health Medical Center	674	581	3,076	2,756	5	5	11	9	77%	84%
Carroll Hospital Center	1,312	857	4,603	3,855	3	5	20	20	63%	53%
Frederick Memorial Hospital	1,072	1,001	6,818	6,158	6	6	21	21	89%	80%
Holy Cross Hospital-Germantown [±]		393		1,557		4		6		71%
Howard County General Hospital	1,026	847	5,405	5,328	5	6	20	20	74%	73%
Johns Hopkins Bayview Medical Center	887	700	6,133	6,345	7	9	20	20	84%	87%
Johns Hopkins Hospital	2,801	2,554	32,863	32,005	12	13	108	108	83%	81%
MedStar Franklin Square	1,239	2,200	6,150	916	5	5	24	40	70%	6%
MedStar Montgomery Medical Center	1,437	1,109	4,744	-	4	4	25	20	52%	
MedStar Southern Maryland Hospital Center	1,024	1,346	4,280	-	4	5	25	25	47%	
MedStar St. Mary's Hospital	558	821	2,139	-	4	4	12	12	49%	
MedStar Union Memorial Hospital	1,971	536	7,755	1,946	4	6	26	26	82%	21%
Meritus Medical Center	1,028	1,146	4,575	5,275	4	5	18	18	70%	80%
Northwest Hospital Center	941	1,366	5,746	9,518	6	7	14	30	112%	87%
Peninsula Regional Medical Center	846	725	3,704	3,805	4	5	10	12	101%	87%
Sinai Hospital	1,327	1,170	8,055	7,375	6	6	24	24	92%	84%
Suburban Hospital	1,401	1,224	6,889	7,194	5	6	24	24	79%	82%
UM-Baltimore Washington Medical Center	986	924	5,276	4,795	5	5	14	14	103%	94%
UM-Harford Memorial Hospital	1,384	1,235	7,083	7,349	5	6	27	26	72%	77%
UM-Laurel Regional Hospital	812	770	3,512	3,608	4	5	14	18	69%	55%
UMMC Midtown Campus	1,498	1,047	9,281	7,924	6	8	28	28	91%	78%
UM-Prince George's Hospital Center	1,369	1,139	7,398	7,782	5	7	28	28	72%	76%
UM-Shore Regional Health at Dorchester	683	580	-	-	5	7	16	24		
UM-St. Joseph Medical Center	712	820	5,449	5,862	8	7	19	19	79%	85%
Union Hospital of Cecil County	734	510	-	2,411	3	5	7	11		60%
University of Maryland Medical Center	1,694	1,116	15,359	12,857	9	12	56	56	75%	63%
Washington Adventist Hospital	1,738	1,475	9,752	7,965	6	5	40	39	67%	56%
Western Maryland Regional Medical Center	1,203	1,059	5,080	4,829	4	5	20	19	70%	70%
GRAND TOTAL	34,047	30,538	189,989	166,213	6	5	703	741	74%	61%

Source: HSCRC, MHCC.

± Holy Cross Hospital – Germantown did not report data for FY2013.