



October 30, 2024

Director Dempsey
New Hampshire Department of Justice
One Granite Place, South
Concord, NH 03301

RE: NAMI NH comment on HCA/CMC proposed transaction

Dear Director Dempsey:

Thank you for the opportunity to provide comments on the proposed transaction between Catholic Medical Center and HCA Healthcare, Inc. My name is Holly Stevens, and I am the Director of Public Policy at NAMI New Hampshire, the National Alliance on Mental Illness. NAMI NH is a non-profit, grassroots organization whose mission is to improve the lives of all people impacted by mental illness and suicide through support, education and advocacy. Although NAMI NH does not take an official position on the proposed transaction, we offer the following comments for your consideration as you conduct your review.

Catholic Medical Center is an essential provider of mental health and substance use disorder services for individuals and families throughout Manchester and the surrounding areas. Despite the current availability of services, however, we know that Granite Staters already struggle to get the help they need, when and where they need it. Though the proposed transaction has the potential to bring CMC the stability it needs in order to continue providing essential health services, including mental health services, to individuals in the Manchester area and beyond, NAMI NH has heard firsthand from community members who have had challenges getting their mental health needs properly met at other HCA facilities in New Hampshire. As such, careful attention must be given to ensure that the proposed transaction between CMC and HCA enhances access to much needed mental health care, rather than limiting it. NAMI NH firmly believes that the full suite of mental health and substance use services currently provided by CMC must be maintained should the proposed transaction proceed. Further, these services must remain affordable so that all who need them may access them.

As a not-for-profit hospital, CMC is required to perform a community health needs assessment to evaluate the community's most pressing health needs. This assessment is a crucial guiding force for the health services provided by the hospital and serves to ensure that the most pressing needs

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of the community will be met. However, as a for-profit health system, HCA will not be required to conduct such an assessment.

The most recent assessment, conducted in 2022, found, among other priorities, a need to reduce and prevent substance misuse and improve access to behavioral/mental health care. Currently, Catholic Medical Center addresses these community needs through three important programs: The Doorway of Greater Manchester, the Healthcare for the Homeless (HCH) Program of Manchester, and the Roots for Recovery Program.

The Doorway of Greater Manchester provides crucial access to services for people seeking help for substance use. These services often include crisis stabilization, evaluation, care planning, and more. Through HCH, CMC provides essential primary and mental health care to individuals experiencing homelessness. The program further provides access to primary care, social services, and health education. These services are an essential aspect of the mental health system in Manchester, as about 1 in 5 people experiencing homelessness in the U.S. have a serious mental health condition. Finally, the Roots for Recovery Program provides addiction treatment and recovery services to medically underserved pregnant individuals and babies.

Despite the crucial role of these programs in improving health outcomes for the greater Manchester community, they are not included in the proposed transaction. Instead, it is proposed that these programs will be supported by a new foundation created through the transaction. However, as noted in the analysis by Berry Dunn, there are significant concerns that the funds available through this foundation will be insufficient to support these programs at the same level that CMC has.¹ These concerns are shared by NAMI NH. Should these programs not be able to operate at their current capacity, the mental health of individuals throughout Manchester and the surrounding areas will be undeniably impacted. The exclusion of these programs from the transaction presents a significant community needs concern and must be closely investigated.

With the ongoing statewide crisis of emergency department boarding in mind, NAMI NH is concerned with the ongoing provision of emergency psychiatric services in CMC's ED. In the proposed transaction, it is unclear whether these services will continue, and if they do, who will provide them. Due to this uncertainty, we offer today, as submitted at the public hearing, the following questions for your consideration as you review this transaction:

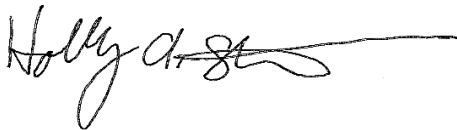
- Currently, CMC provides behavioral health care to patients throughout Manchester and the surrounding areas. These services include psychiatric emergency services through the Emergency Department. Will the full suite of behavioral health services currently provided by CMC be maintained?

¹ Catholic Medical Center and HCA Healthcare Proposed Transaction, Public Hearing Fact Sheet created by Berry Dunn.

- When someone comes into the emergency room with a mental health crisis, will they receive psychiatric emergency services? If so, who will provide that emergency mental health care? If not, how will the person be connected to the care they need?
- How will CMC's behavioral health provider workforce be impacted by the proposed transaction?
- If a patient needs an involuntary emergency admission, who will provide the assessment that is required for this process?
- Knowing that currently, people wait days, if not weeks, in NH emergency rooms for designated receiving facility beds, where will the 3-day involuntary emergency admission court hearings be held, and how will they be held?

In light of the ongoing mental health and substance use crisis impacting New Hampshire, the behavioral health services and community programs currently provided by CMC must be maintained for the good of the greater Manchester community. Granite Staters need access to a full suite of healthcare services, including mental health services, that are affordable and accessible within their community. In the review of this proposed transaction, NAMI NH encourages the Charitable Trust Unit to evaluate, consider and prioritize the current and future needs of the entire community served by CMC. Thank you for the opportunity to comment, and please do not hesitate to reach out with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Holly A. Stevens", with a long horizontal flourish extending to the right.

Holly A, Stevens, Esq.