

March 10, 2026

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

RE: Impacts of SolutionHealth Dissolution on Behavioral Health Access

Director Dempsey:

Thank you for the opportunity to provide comments on the proposed dissolution of SolutionHealth, the parent organization of Elliot Health System (Elliot) and Southern New Hampshire Health System (SNHHS). 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.

Both Elliot and SNHHS are essential providers of mental health and substance use disorder services throughout Manchester, Nashua, and the surrounding areas. Through these systems, individuals and families are able to access a full suite of inpatient and outpatient services to meet their specific needs. Although NAMI NH does not take a formal position on the proposed dissolution, we urge the state and the affected systems to proactively address and commit to protecting continued access for community members.

Should either system face financial challenges within the coming years as a result of such dissolution, it is imperative that the robust array of currently available services not be reduced to accommodate financial shortfalls. Despite the current availability of services provided by these systems, Granite Staters already struggle to get the help they need, when and where they need it. If either hospital decreased their behavioral health services due to a negative financial impact or other reason, the people of Nashua, Manchester, and the surrounding communities would face even greater challenges accessing care and would potentially have to leave their communities for services such as inpatient care, outpatient care, partial hospitalization, or intensive outpatient treatment.

Additionally, though it is unclear to what extent resource-sharing occurs, it is possible for these systems to coordinate resources under their currently shared parent organization, SolutionHealth. Such collaboration between systems may especially be of importance to address gaps in services

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between the two entities. To the extent that resources are currently shared and coordinated, the dissolution of SolutionHealth could impact access for both systems. For example, Elliot currently operates several designated receiving facility (DRF) beds providing involuntary inpatient psychiatric care – SNHHS does not. This disparity could result in longer emergency department boarding times for individuals waiting for an involuntary inpatient psychiatric bed in the Nashua area.

In 2022 and 2023 respectively, Manchester and Nashua conducted community needs assessments that both identified mental health and substance use as community concerns and areas needing focus.¹² The assessments highlighted how access to care can be a challenge and that mental health issues (including suicidal behaviors) and substance use are prevalent in both communities. The Manchester assessment specifically emphasized youth mental health as a problem area, stating that data regarding hospitalizations for suicidal ideation and suicide attempts/self-harm “provide a clear indication that increased mental health services are needed for youth in Manchester.”

Given the identified need in both communities, it is essential that both hospitals continue to provide a full array of behavioral health services now and into the future, including within any subsequent acquisitions.

Due to the ongoing, state-wide mental health, suicide, and emergency department boarding crises, we must pay careful attention to the interactions and potential for shared services between the system under SolutionHealth, as well as how the dissolution may impact those services and the intentions of Elliot and SNHHS to continue providing current services should a costly dissolution occur. With this in mind, we offer the following questions for consideration as you review this dissolution:

- Does SNHHS use or have a preferred status regarding the 14 DRF beds at the Elliot? If so, do the parties anticipate an impact on ED boarding in the Nashua if there is a dissolution?
- Despite the cost of a dissolution and the fact that behavioral health services are generally not considered core health services for the hospitals, do the parties intend to continue offering all behavioral health services currently being provided by each hospital?

¹ Greater Nashua Public Health Region Data Dashboard, Community Health Assessment 2023, <https://dashboards.mysidewalk.com/gnphr-cha/community-health-assessment>

² Greater Manchester Community Health Needs Assessment 2022, <https://www.elliotohospital.org/application/files/9516/8746/2883/Manchester-Community-Health-Needs-Assessment-2022.pdf>

- If either or both hospitals seek or enter into another affiliation in the future, what assurances will they provide today that they will continue offering the full array of behavioral health services currently offered today?
- Are the hospitals willing to provide the following assurances regarding current and future behavioral health services:
 - Minimum maintenance of all 14 existing DRF beds at the Elliot for 10 years,
 - Minimum maintenance of all inpatient psychiatric beds at the Elliot and SNHH for 10 years,
 - Minimum maintenance of all outpatient behavioral health services for at least 5 years,
 - Continued active partnership with their respective CMHCs and other behavioral health providers/resources,
 - Should any behavioral health services, inpatient or outpatient, be discontinued, the hospital will provide a minimum 120-day notice and public comment on discontinuation of inpatient beds, and a minimum 120-day notice on discontinuation of outpatient services with coordinated transfer of patients to appropriate providers who take the patient's insurance.

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 dissolution, NAMI NH encourages the Charitable Trust Unit to evaluate, consider and prioritize the current and future needs of the entire community served by both Elliot and SNNHS. Thank you for the opportunity to comment, and please do not hesitate to reach out with any questions.

Sincerely,



Holly A. Stevens, Esq.
Director of Public Policy