



December 9, 2022

Jan Malcolm, Commissioner
Minnesota Department of Health
625 Robert Street North
St. Paul, MN 55164

RE: Public Comment on the Children's Minnesota Public Interest Review

Dear Commissioner Malcolm,

The Minnesota Medical Association (MMA) appreciates the opportunity to comment on the Children's Minnesota Public Interest Review as it concerns the proposed addition of 22 hospital beds for children in need of mental healthcare. We support the additional beds and the role they will play in helping to alleviate a regional shortage in inpatient mental healthcare capacity for children.

This review comes at a time when Minnesota physicians report unprecedented emergency department (ED) boarding of patients experiencing mental health crises, especially among children. It is increasingly common for children to wait days or weeks in EDs, often without appropriate mental health treatment, as they await available beds. Most recent data indicate that there are no psychiatric hospital beds for children in any of the eight counties which border Hennepin and Ramsey Counties ([MDH, 2020](#)). While Hennepin County has 45.5 psychiatric beds for children per 100,000 children, and Ramsey County has 11.7 psychiatric beds for children per 100,000 children, they both fall short of the most commonly cited recommendation of adequate psychiatric beds per capita: 50 per 100,000 ([Treatment Advocacy Center, 2016](#)). Put simply, these beds are needed to support care needs in the Twin Cities metropolitan area.

The MMA strongly supports the Children's Minnesota bed expansion and recognizes that more work remains to be done to address the inadequate number and distribution of psychiatric hospital beds for children statewide. There are only 13.9 psychiatric hospital beds per 100,000 Minnesota children, and most of these beds are concentrated in Minnesota's largest cities. We look forward to working with the health department, health systems, and policy makers to further develop solutions to better serve the mental healthcare needs of all Minnesotans.

Sincerely,

William Nicholson, MD
President