

The Commonwealth of Massachusetts  
Executive Office of Health and Human Services  
Department of Public Health  
Division of Health Care Facility Licensure and  
Certification  
99 Chauncy Street, Boston, MA 02111

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August 16, 2018

Andrew S. Levine  
Barrett & Singal  
One Beacon Street, Suite 1320  
Boston, MA 02108

BY EMAIL ONLY

Re: UMass Memorial HealthAlliance - Clinton Hospital, Essential Service Finding

Dear Attorney Levine:

On July 2, 2018, the Department of Public Health (the "Department") received notification from you of UMass Memorial HealthAlliance – Clinton Hospital's, ("HealthAlliance") intent to close its inpatient pediatric unit at its Leominster campus ("Pediatric Services"). Pursuant to 105 CMR 130.122 (D), the Department held a public hearing on August 1, 2018. As required under 105 CMR 130.122(E), the Department considered the information available to it, including testimony presented at the hearing, and determined that the Pediatric Services provided by HealthAlliance at its Leominster campus are necessary for preserving access and health status in HealthAlliance's service area.

Accordingly, pursuant to 105 CMR 130.122(F), HealthAlliance is required to prepare a plan for assuring access to the essential service(s) post closure. The plan must be submitted to the Department within 15 calendar days of receipt of this letter. HealthAlliance's plan must include the elements specified in 105 CMR 130.122(F) as listed below:

- (1) Information on utilization of the service(s) prior to proposed closure;
- (2) Information on the location and service capacity of alternative delivery sites;
- (3) Travel times to alternative service delivery sites;
- (4) An assessment of transportation needs post closure and a plan for meeting those needs;
- (5) A protocol that details mechanisms to maintain continuity of care for current patients of the discontinued service; and

- (6) A protocol that describes how patients in HealthAlliance's service area will obtain the services at alternative delivery sites.

In addition to the regulatory elements listed above, and in light of the Department's review of testimony on the proposed Pediatric Services closure, please include within your submitted plan the following:

- (1) **Emergency Department (ED) Use:** Information regarding HealthAlliance's plans to treat pediatric patients in the ED, and if any pediatric patients will be held for observation, please provide information on the following specific details:
  - a. How the safety of pediatric patients will be ensured and their needs will be met in light of the anticipated flow of adult patients into and out of the ED;
  - b. How HealthAlliance will evaluate competency of ED staff to meet the needs of pediatric patients who present at the ED; and what will be done to ensure trained and competent ED staff will be available at all times to respond to the needs of such patients in the future.
- (2) **Transportation:** Based on testimony submitted to the Department and presented at the August 1, 2018 hearing, concern was expressed about the impact closing the Pediatric Services will have on children and families who will need to be served at other facilities that are further away from their homes, substantially limiting the ability of many families to provide comfort and support to a hospitalized child. The plan which you are required to submit must address alternate methods of transportation to facilities outside the Leominster community, and an assessment of the associated transportation costs, including parking.
- (3) **Continued Service Operation:** Based on testimony presented at the hearing held on August 1, 2018, concern was expressed that HealthAlliance had closed the Pediatric Services sometime in April 2018. The plan you are required to submit must provide details indicating that the Pediatric Services remains open and HealthAlliance continues to comply with the requirements of 105 CMR 130.000, including but not limited to 105 CMR 130.122.
- (4) **Cultural and Linguistic Needs of Populations Served:** Due to the diverse cultural and linguistic needs of the populations served by HealthAlliance's Leominster campus, your plan must include information as to what HealthAlliance has done or will do to assess the cultural and linguistic needs of the populations it currently serves; what needs have been identified; and to what extent the alternate delivery sites, identified as likely to provide care after the proposed closure, will be able to address those needs.
- (5) **Engagement with Community Groups:** Based on testimony submitted to the Department and presented at the August 1, 2018 hearing, concern was

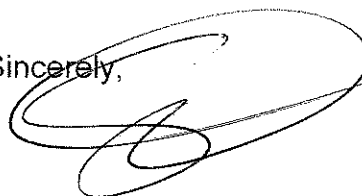
expressed that HealthAlliance failed to appropriately communicate with the local community and hospital staff, and engage the community and hospital staff in its planning when changing how services are delivered. The plan which you are required to submit must address how HealthAlliance intends to initiate ongoing engagement with the local community and staff to ensure they are aware of the impact of the discontinuance of the service and a plan to ensure access in the future. The plan must address:

- a. Community and staff engagement regarding the impact of elimination of the Pediatric Services on patient and families, and alternatives to the elimination of the Pediatric Services.
- b. Concerns expressed that some residents of Fitchburg view the Urgent Care Center at the HealthAlliance Burbank campus as the continuation of the Burbank Hospital Emergency Department, and how HealthAlliance will provide community education, in the primary language of the affected resident population, to ensure people with emergent conditions are not brought to the HealthAlliance Burbank campus after the closure of the Urgent Care Center.
- c. Concerns expressed regarding the additional distance cardiac/pulmonary rehabilitation patients will have to travel for care after the closure of the program at HealthAlliance's Leominster campus, including an assessment of transportation needs following closure, and options available or which will be made available to meet those needs.

Under the provisions of 105 CMR 130.122(G), the plan HealthAlliance Leominster submits to the Department will be reviewed to determine if the plan appropriately ensures access to the services following the closure of Pediatric Services at HealthAlliance's Leominster campus.

Thank you for your continued cooperation in this process. If you have any questions, please contact me at (617) 753-8134.

Sincerely,



Stephen Davis  
Licensure Unit Manager

cc: E. Chen, DPH  
S. Lohnes, DPH  
R. Rodman, DPH  
H. Hoefler, DPH