Springfield, MA Pediatric Specialty Care

**®**

 September 22, 2022

BY EMAIL ONLY:

Stephen.Davis@state.ma.us

Stephen Davis

Division Director

Division of Health Care Facility Licensure & Certification

Massachusetts Department of Public Health

67 Forest Street,

Marlborough, MA 01752

**Re: DPH Review of Response Following Essential Services Finding**

**Facility:** Shriners Hospital for Children - Springfield

**Services:** Discontinuation of Hospital Services

**Ref. #:** 2152-021

Dear Mr. Davis:

By letter dated September 12, 2022 (the “DPH Review Letter”), the Department of Public Health (the "Department") notified The Shriners’ Hospital for Children (“Shriners”) that the Department had completed its review of the access plan, submitted to the Department on September 1, 2022, detailing how access to services (the “Hospital Services”) will be maintained following the closure of Shriners Hospital for Children – Springfield (the “Hospital”). Pursuant to 105 CMR 130.122(G), the DPH Review Letter included two comments prepared by the Department and required that the Hospital submit a timely response to such comments.

The Hospital respectfully provides the following responses.

1. **Timing of Transition to Clinic Model:** As the Department is aware, Shriners desires to close the Hospital simultaneously with the opening of the proposed clinic, so that transition of the delivery of the current Hospital outpatient services (other than outpatient surgical care) to the clinic model is seamless for our outpatients and their parents, guardians and family members. If there is a delay in licensure of the proposed clinic, the Hospital plans to delay closure of the Hospital until such clinic licensure is in place and the transition may occur in an orderly manner.
2. **Assessment of Transportation Need Post Discontinuance:** The Department requested that Shriners provide additional information on the criteria which informs whether the Hospital may make arrangements with the family to provide care at another Shriners inpatient hospital location. Shriners Hospital for Children and its affiliated hospitals and health care facilities, including the Hospital (collectively, the “Shriners System”), may provide or coordinate the provision of transportation to patients and patient family members or guardians as appropriate in support of its mission of providing high quality healthcare to its patients, including in accordance with financial need (established through a means test). The Shriners System does not guarantee free transportation, though such services may be provided or arranged for without cost pursuant to the standards from time to time established in applicable policies, subject to availability and applicable law.

In making arrangements for transportation, a preference will be made first for commercially-donated transportation. Several airlines, bus and train companies have donated travel assistance to the Shriners System for use by its patients, patient family members or guardians. Each hospital in possession of commercially-donated transportation makes such donated travel available to all patients and family members in need of such transportation regardless of the patient’s health insurance status. Financial need may be taken into account.

Many members of the Shrine Fraternity volunteer their time to provide free local transportation to Shriners System patients. For example, volunteers transport children (and their parent, guardian, or other persons accompanying the patient) to and from the airport, or to off-site medical appointments. A showing of financial need is not necessary prior to coordinating local transportation with these volunteers; however all such transportation must be within the facility’s catchment area. (This type of transportation does not involve ambulance transportation.)

Hospital funded transportation of patients and parents, legal guardians, or other persons accompanying the patients to and from a hospital, clinic or other location where medical services are required is limited to local transportation, unless there is a showing of financial need, in which case additional transportation may be paid by the Hospital or the Shriners System. The following additional criteria will be considered in whether to approval an exception to the financial need requirement: (i) the exigent circumstances of a case; and

(ii) the availability of hospital funds.

Thank you for the opportunity to provide additional information. We appreciate the Department’s diligent attention to this process.

Sincerely,

 

Edward Geoffrion Frances Marthone PhD, RN

Chairman, Board of Governors Hospital Administrator

cc: E. Kelley, DPH

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