

December 14, 2020



Via Email

Sherman Lohnes, Esq., Director  
Division of Health Care Facility Licensure and Certification  
Massachusetts Department of Public Health  
67 Forest Street  
Marlborough, MA 01752

Re: Formal 90-Day Notice of Reduction of Inpatient Pediatric Beds at Newton-Wellesley Hospital

Dear Attorney Lohnes:

We write on behalf of Newton-Wellesley Hospital, located at 2014 Washington Street, Newton, MA 02462 (the “Hospital”) in follow-up to the initial essential service reduction notice that the Hospital filed with the Department of Public Health (the “Department”) and the appropriate parties required by the Department’s regulations on November 13, 2020. Pursuant to 105 CMR 130.122(B), the Hospital hereby provides formal ninety (90) day notice to the Department of its decision to reduce the number of inpatient pediatric beds by twelve (12). The unit is currently licensed to operate twenty-four (24) beds and as a result of the proposed reduction, the unit will continue to operate with twelve (12) beds. In light of historical trends over the last four years, the Hospital determined that the pediatric inpatient unit would be best served by a 12-bed unit. The unit has experienced reduced patient volume which is an indicator that the patient population does not need the full unit at the Hospital. This change will serve to right-size the pediatric inpatient unit in accordance with historical and projected utilization for inpatient pediatric services.

In compliance with applicable requirements at 105 CMR 130.122(B), the Hospital provides this written notice of the planned reduction of inpatient pediatric beds. The following information regarding the discontinuation is hereby provided for your review.

1. Current Utilization Rates. The following tables represent the inpatient volume of the Hospital’s inpatient pediatric unit over the last several years, including year-to-date:

**A. Annual Data**

NWH Pedi	2017	2018	2019	2020	Trend
Average Daily Census	3.8	5.5	4.4	3.9	Declining Volume

**B. Year-to-Date**

NWH Pedi	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept	Oct	Nov	Avg.
ADC	6.2	6.8	3.2	2.0	3.3	2.9	3.7	3.0	2.3	5.0	3.9	3.9

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Over the last four years, the Hospital's inpatient pediatric unit has experienced a continued decline of Average Daily Census ("ADC") significantly below the licensed bed count. The low ADC and continued decline are evidence of insufficient demand for the full unit at the Hospital.

2. Impact of Discontinuance. The Hospital does not expect any negative impact on patient access following the reduction of the unit. Utilization of the unit for the past four years has been declining and through the proposed reduction, the unit will be right-sized to continue serving NWH's pediatric patient population.

Specifically, in the last 49 months ADC has never met or exceeded twelve (12) and only for six months, did ADC meet or exceed six (6). Therefore, the proposed reduction will not negatively impact pediatric services. Furthermore, the remaining 12 beds will maintain sufficient capacity well-above what is indicated by historical ADC.

3. Date Set of Discontinuation. Ninety (90) day notice is hereby given for a target implementation date of March 14, 2021.

4. Health Care Coalitions and Community Groups. The hospital does not anticipate any health care coalitions and/or community groups will have an interest in the reduction.

5. Community Engagement and Planning Activities Prior to the Notice. The Hospital has undertaken the following community engagement and planning activities:

- October 19, 2020
  - NWH hosted a phone call with members of the departments and teams impacted by the proposed reduction. A phone call was also held with MNA leadership and the hospital's Board of Trustees.
- October 20, 2020
  - A virtual meeting was held with Hospital Leadership as well as a phone call with Ron Kleinman, MD, Mass General Chair of Pediatrics, and Sandy Dodge Magee, VP MassGeneral Hospital for Children
- October 21, 2020
  - Virtual town hall meeting was held for all NWH Employees followed by an email communication to all employees.
- October 27, 2020
  - Virtual meeting with Rep. Lawn
  - Virtual meeting with Senator Creem
  - NWH provided notice of the planned reduction to Mayor Fuller (Newton)
- November 4, 2020
  - Virtual meeting held with Rep. Kahn



- November 6, 2020
  - NWH provided notice of the planned reduction to Mayor McCarthy (Waltham)
  - Phone call held with Newton City Council President Susan Albright
  - Virtual meeting held with Rep. Balser
  
- November 13, 2020
  - Email notice of the proposed reduction was provided to:
    - Mayors McCarthy and Fuller
    - Senator Creem
    - Representatives Balser, Lawn, and Khan
    - Newton City Council President Susan Albright
    - NWH Patient and Family Advisory Council
    - Massachusetts Nurses Association Leadership
    - All NWH Employees
  
- November 18, 2020
  - Virtual update was provided to the NWH Board of Trustees
  
- December 9, 2020
  - Virtual update was provided to the NWH Board of Trustees

If you require further information with respect to this matter, please do not hesitate to contact me.  
Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read 'ASL', written in a cursive style.

Andrew S. Levine

cc: S. Carlson, DPH  
S. Davis, DPH  
E. Gold, Esq., OAG  
W. Mackie, DPH  
E. Moloney, NWH  
A. Nardone, DPH  
C. Philbin, MGB  
R. Rodman, Esq., DPH

Health Policy Commission  
Office of the Attorney General (Massachusetts)  
Center for Health Information and Analysis  
Executive Office of Labor and Workforce Development