

December 31, 2019

BY EMAIL and FEDEX

Stephen Davis MBA
Division of Health Care Facility Licensure and Certification
Massachusetts Department of Public Health
67 Forest Street
Marlborough, MA 01752

Re: **Cambridge Public Health Commission (License No. VVA5)**
Conversion of Somerville Emergency Department to Urgent Care

Dear Mr. Davis:

Pursuant to and in accordance with 105 CMR 130.122(B), licensee Cambridge Public Health Commission, d/b/a Cambridge Health Alliance (“CHA”), hereby notifies the Department of Public Health (the “Department”) that CHA plans to convert the Emergency Department at its CHA Somerville Hospital campus (the “Somerville ED”) to an urgent care center (the “Conversion”) on or about, but not before, April 2, 2020.

A. About the Conversion.

CHA is committed to providing services to meet the evolving needs of the Somerville community and the other communities we serve. The new CHA Somerville Urgent Care Center has been designed and planned to meet these needs and will provide a broader and deeper range of services than traditional urgent care clinics. Open daily from 9 a.m. to 9 p.m., the CHA Somerville Urgent Care Center will offer X-rays, lab services/blood tests and IV medications and fluids, all of which are generally not available at other area urgent care clinics.

The CHA Somerville Urgent Care Center will be staffed by emergency medicine physicians and registered nurses. The physicians will rotate between this site and CHA’s two Emergency Departments. CHA will provide patients the full-range of its extensive cultural, language and other support services that it provides at its Emergency Departments and other sites. CHA will care for all patients who present at the CHA Somerville Urgent Care Center, regardless of ability to pay.

As further explained in Sections C and E below, patients requiring higher-level care will have access to such care at the nearby CHA Cambridge Hospital campus Emergency Department

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Beth Israel Deaconess
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HARVARD MEDICAL SCHOOL
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PUBLIC HEALTH



School of
Medicine

(the “Cambridge ED”) located within two miles of the CHA Somerville Hospital campus on the Somerville/Cambridge city line. The new CHA Somerville Urgent Care Center will support access to health care services by providing a lower cost option for low acuity patients.

B. Somerville ED Utilization Has Steadily Declined.

The decision to convert the Somerville ED into the CHA Somerville Urgent Care Center is driven by changes in patient behavior and the utilization of the service, which has been steadily dropping as shown in the following table.

Year:	FY 2013	FY 2014	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019
Visits:	19,288	17,849	17,701	18,138	17,334	16,256	15,959

Tellingly, in fiscal year 2018 the Somerville ED averaged 6.2 registrations per night between 11:00 pm and 7:00 am (less than one visit per hour.) In addition, Emergency Severity Index (ESI) data for the last four-plus years shows that approximately 60 percent of Somerville ED patients present with conditions that could be treated in an urgent care setting (*i.e.*, ESI 4 or ESI 5.)

	FY16		FY17		FY18		FY19		7/1 –10/31/19	
ESI-1	49	0%	38	0%	25	0%	30	0%	9	0%
ESI-2	1,119	6%	1,040	6%	939	6%	1,026	6%	565	7%
ESI-3	5,201	29%	5,136	30%	5,281	33%	5,545	35%	2,940	37%
ESI-4	10,310	58%	10,067	58%	9,070	56%	8,508	54%	4,070	51%
ESI-5	1,217	7%	988	6%	859	5%	789	5%	366	5%
Total*	17,896	100%	17,269	100%	16,174	100%	15,898	100%	7950	100%

* Does not include visits where ESI not reported. Hence the apparent discrepancy with utilization data.

C. CHA Will Continue to Provide Emergency Services at the Cambridge ED While Also Making Urgent Care Services Available to the Communities It Serves.

After the Conversion, the Somerville community will continue, without interruption, to have access to emergency services at CHA’s nearby Cambridge ED while providing a new, more affordable option for patients with lower acuity conditions. Located on the Somerville/Cambridge city line, the Cambridge ED has more than sufficient capacity to care for all current Somerville ED patients and certainly all current Somerville ED patients with an ESI of 1, 2, or 3. CHA expects to serve approximately 11,000 patients per year at the CHA Somerville Urgent Care Center. CHA anticipates that many low acuity patients will seek care at the CHA Somerville Urgent Care Center because it will be a lower cost alternative than an emergency department.

Shifting to urgent care fills a gap in care for underserved populations, offering an innovative and lower-cost option for patients who currently use the Somerville ED to address urgent health issues. It will also increase access by providing a lower cost option for those patients who do not currently seek care at the Somerville ED because of the higher co-pay requirements mandated by third party payors.

D. CHA's Extensive Community Engagement and Planning.

CHA has communicated with community and internal stakeholders through an extensive engagement process. In February 2018, the City of Somerville and CHA jointly convened the Somerville/ CHA Health Care Advisory Group comprised of representatives from CHA, the City of Somerville, and the community at-large facilitated by an independent consultant. The advisory group holistically assessed the health priorities for the City of Somerville and how CHA could meet these needs. As part of its assessment process, the advisory group held five listening sessions in various Somerville neighborhoods. The advisory issued its report in June 2019, recommending, among other things, that CHA establish an urgent care center at the CHA Somerville Hospital campus "to address issues of access, convenience, and affordability and to support the continuity of care."

On June 26, June 27 and July 1, 2019 CHA held open community meetings at the East Somerville Community Center, the Somerville Public Library, and the VFW George Dilboy Post 529 in Davis Square. At the community meetings CHA presented its overall plan for meeting the needs of the Somerville community and, specifically, the proposed Conversion. Community members, representatives of labor organizations at CHA, and CHA trustees attended the community meetings and were provided the opportunity to speak during the open comment sessions at each meeting. On July 16, 2019 at a meeting that was publicly posted and open to the public, the CHA Board of Trustees voted to approve an overall plan, including the Conversion, for meeting the health care needs of the Somerville community. Most recently, on December 16, 2019, at one of its periodic meetings for neighbors of the CHA Somerville Hospital campus CHA discussed the Conversion as one of the meeting topics.

E. Conversion Meets the Criteria of 105 CMR 130.122(D)(2).

The Conversion meets the criteria of 105 CMR 130.122(D)(2). Upon the Conversion, CHA will continue, without interruption, to provide the emergency services currently provided at the Somerville ED at a new site for such services, the Cambridge ED, to the same patient population served by the Somerville ED. CHA will also provide, without interruption, urgent care services at the CHA Somerville Urgent Care Center to meet the clinical needs of a majority of the patients currently served by the Somerville ED. The Cambridge ED, both on its own and in tandem with the new CHA Somerville Urgent Care Center, has sufficient physical capacity and resources to serve the patient volume currently served by the Somerville ED.

1. Cambridge ED Location, Capacity and Resources.

The Cambridge Hospital campus is located on the Somerville/ Cambridge city line and within a five mile radius of the Somerville Hospital campus. Depending on the specific route

taken, the driving distance from the Somerville Hospital campus to the Cambridge Hospital campus is between 1.5 and 2.1 miles.

Even if the entire patient population currently served by the Somerville ED were to be served by the Cambridge ED, the Cambridge ED has sufficient physical capacity and resources to serve the same patient volume as is currently served by the Somerville ED. In 2016, CHA expanded the licensed bed capacity of the Cambridge ED by 44 percent from 18 beds to 26 beds. As the following utilization data demonstrates, visit volume at the Cambridge ED has essentially remained flat since the expansion. Visit volume for the Somerville ED has decreased.

Year	Cambridge ED Visits	Somerville ED Visits
FY2103	30,822	19,288
FY2014	29,670	17,849
FY2015	32,909	17,701
FY2016	32,263	18,138
FY2017	31,905	17,334
FY2018	32,131	16,256
FY2019	32,015	15,959

Measured by “bed time” capacity¹, the expanded Cambridge ED will have more than enough capacity to serve all of the current Somerville ED patients as shown in the following table.

Year	Cambridge ED Occupancy	Somerville ED Occupancy	Cambridge ED Occupancy if Entire Somerville ED Volume Added
FY2017	62%	37%	81%
FY2018	68%	37%	86%
FY2019	65%	38%	84%

In addition to having the physical capacity, the Cambridge ED is staffed with sufficient resources to serve the patient volume coming to it from the Somerville ED. A key measure for emergency department access is wait times. By this measure the Cambridge ED will be readily able to absorb the additional volume of Somerville ED patients. The current average door to room time at the Cambridge ED is only two minutes, with the current average door to provider time being approximately 15 minutes.

¹ CHA totaled the time from ED check-in to ED check-out for all of its patients at the Cambridge and Somerville EDs for fiscal years 2017 – 2019. It then divided this total time that patients were in ED beds by the total bed availability (Beds x 24 hrs/day x 365 days.)

2. CHA Somerville Urgent Care Capacity and Resources.

The Cambridge ED has the capacity and resources to serve all the current Somerville ED patients, but CHA does not anticipate that the entire Somerville ED patient volume will seek care (or need to seek care) at the Cambridge ED. Instead, the new CHA Somerville Urgent Care Center will be able to serve many of the same patients who currently go to the Somerville ED. As shown in Section B above, approximately 60 percent of Somerville ED patients present with conditions that could be treated in an urgent care setting.

CHA expects to serve approximately 11,000 patients per year at the CHA Somerville Urgent Care Center. CHA anticipates that many low acuity patients, both current Somerville ED patients and new patients, will seek care at the CHA Somerville Urgent Care Center because it will be a lower cost alternative than an emergency department.

In terms of resources, the CHA Somerville Urgent Care clinic will be better resourced than traditional urgent care clinics. It will be staffed by CHA Emergency Department physicians and registered nurses. The physicians will rotate between this site and CHA's two Emergency Departments. CHA will provide the full-range of cultural, language and other support services to patients that it provides at its EDs and other sites.

F. CHA is Sending All Required Parties a Copy of This Notice.

CHA is sending a copy of this notice to the Health Policy Commission, the Office of the Attorney General, the Center for Health Information and Analysis, and the Executive Office of Labor and Workforce Development. CHA is also sending a copy of this notice to each of the health care coalitions and community groups identified on Exhibit A.

CHA recognizes that the Conversion is subject to its meeting all applicable Department Plan Review and licensure requirements for CHA Somerville Urgent Care Center and the CHA Somerville Hospital campus.

CHA looks forward to working with the Department, CHA staff and the community to effect this conversion and continue its efforts to improve access to care for Somerville and all the communities it serves.

Sincerely,



Andrew M. Fuqua
SVP and General Counsel

Exhibit A

Health Care Coalitions and Community Groups

VNA of Eastern Mass
259 Lowell Street
Somerville, MA 02144
Attn: Linda Cornell, President and CEO

Immigrant Service Providers Group
c/o Somerville Community Corporation
337 Somerville Ave, 2nd floor
Somerville, MA 02143
Attn: Alex Pirie

Riverside School Based Services (formerly the Guidance Center)
111 South Street
Somerville, Ma 02143

Community Action Agency (CAAS) of Somerville
66-70 Union Square
Suite 104
Somerville MA 02143
Attn: J David Gibbs, Executive Director

Baycove Human Services (CASPAR)
66 Canal Street
Boston MA 02114
Attn: Bill Sprague, President/CEO

Somerville Council on Aging
Tufts Administration Building
167 Holland Street
Somerville, MA 02144
CIndy Hickey, Director

Somerville/Cambridge Elder Services
61 Medford Street
Somerville, MA 02143
Paul Hollings Executive Director

The Welcome Project
530 Mystic Ave #111
Somerville, MA 02145
Ben Echevarria, Executive Director

Massachusetts Association of Portugese Speakers (MAPS)
1046 Cambridge St.
Cambridge, MA 02139
Attn: Paulo Pinto, Executive Director

Somerville Homeless Coalition
1 Davis Square
Somerville, MA 02141
Attn: Michael Libby Executive Director

Connexion
149 Broadway Street
Somerville, MA 02145
Attn: Pastor Jordan Harris

Catholic Charities
270 Washington Street
Somerville, MA 02143
Attn: Sister Donna Markham, President and CEO