

June 29, 2020



Via Email

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

Re: Holyoke Medical Center, Inc. – Formal 90-Day Essential Service Notice –
Closure of Inpatient Obstetrics/Maternity Services and Well Infant Nursery

Dear Attorney Lohnes:

We write on behalf of Holyoke Medical Center, Inc. (the “Medical Center” or “HMC”). Pursuant to 105 CMR 130.122(B), the Medical Center hereby provides ninety (90) day notice to the Department of Public Health (“Department”) of its decision to discontinue its operation of its Inpatient Obstetrics/Maternity Service and its bassinet Well Infant Nursery service (the “Services”). This letter is in follow-up to the required initial notices that were filed with the appropriate parties on May 29, 2020. We offer the following comments with respect to this matter.

The Medical Center has determined that the Services should be closed due to low utilization for the past several years. Without a higher caseload of obstetric/maternity and infant patients, the professional skills and competence of the Medical Center’s physicians and staff have the potential to not be sufficiently preserved or developed, particularly in matters involving complications such as emergency C-sections. In addition, without a critical volume, further investments in the Services are financially not feasible. A hospital cannot maintain clinically thriving and financially sound obstetrical/maternity and nursery services if few patients choose to use them and, instead, obtain care from other providers.

Patient choice in the service area is the main driver of these considerations. Without a NICU and the specialists who staff it, many parents choose to give birth elsewhere. Importantly, the patient community is able to access equivalent services in the Medical Center’s service area. Due to the COVID-19 pandemic emergency, on April 4, 2020, the Department gave the Medical Center approval to change the use of the obstetrical/maternity unit to meet community needs and treat residents from the Soldiers’ Home in Holyoke. Thus, due to this change in function, births at the Medical Center have stopped and births in the service area have been shifted to the other three area hospitals. The pandemic remains ongoing and it is expected that the Medical Center will continue to use the unit to treat Soldiers’ Home patients into the Fall of this year. Therefore, the Medical Center has determined that the permanent closure of the Services does not present any risk to patient access or health, particularly where the use of the unit has already changed to meet community health needs without adverse effects.

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In compliance with applicable requirements at 105 CMR 130.122(B), the Medical Center provides this written notice of the planned discontinuance of the Services. The following information regarding the discontinuation is hereby provided for your review:

1. Current and historical utilization rates (volume) for each of the Services (YTD and last 3 years).

	2019	2018	2017	2016	2015	2014	2013	2012
<i>City of Holyoke Births at HMC</i>	173	178	157	172	177	188	188	171
<i>Total Births at HMC</i>	368	457	448	455	441	421	438	435
<i>Avg. births per day</i>	1	1.25	1.23	1.25	1.21	1.15	1.2	1.19

The Medical Center has, and has had for many years, only thirty-eight percent (38%) of the obstetrical/maternity market share with respect to patients from the City of Holyoke (the “City”); meaning, only about 1/3 of mothers living in the City choose to deliver at the Medical Center. The remaining sixty-two percent (62%) or approximately 2/3 of patients from the City choose to deliver at other hospitals outside the City as follows: Baystate Medical Center 40%, Mercy Medical Center 18% and Cooley Dickinson Hospital 4%. This data means that about twice as many patients from the City do not choose or rely on the Medical Center for the Services, but rather seek other providers outside of Holyoke. In the wider service area, including Holyoke, South Hadley and Chicopee, the Medical Center has had a market share of approximately twenty-four percent (24%) with respect to the Services.

The table above shows a low utilization and decline in births at the Medical Center and presents the number of births at the Medical Center from patients residing in the City and the number of births at the Medical Center in total over the past eight (8) years. For many years, the Medical Center has endeavored to market the Services, to seek and receive a “Baby-Friendly” designation, and to implement innovative techniques, including the use of nitrous oxide. However, it has been unable to grow the number of births at its facility.

Since 2012, the births at the Medical Center from patients residing in the City have remained constant, with 171 births in 2012 and 173 births in 2019. However, total births at the Medical Center have declined, with only 368 births in 2019 compared to 435 births in 2012. This decline constitutes a significant fall in volume of over fifteen percent (15%) compared to 2012. The



FY2020 volume for 7 months is also low at 163 births (October 1, 2019 until April 4, 2020 when the Services changed to care for Soldiers' Home residents).

Furthermore, with only 368 births at the Medical Center in 2019, the Medical Center's average daily census in the Obstetrics/Maternity unit for the year was at its lowest with only one (1) patient on average. However, average patients per day annually has been less than two (2) patients since 2012. As a result, for years there have been times when the Medical Center was required to staff the Services when there were no patients in the unit.

2. A description of the anticipated impact on individuals in the Medical Center's service area following the closure of the Services.

The Medical Center does not anticipate a negative impact to patients in the service area. Expectant mothers have the benefit of numerous other choices of hospitals for care and deliveries. Obstetric/Maternity services are available at Mercy Medical Center, Baystate Medical Center and Cooley Dickinson Hospital.

In addition, the majority of patients in the Medical Center's service area already seek prenatal and maternity services from other clinical providers. Since deliveries at the Medical Center stopped in April of this year due to the COVID-19 emergency, there has been no documented or reported access issues or capacity issues. Rather, the patient community has continued to access equivalent services at other providers and has otherwise adjusted to the Services being taken offline at the Medical Center.

The Medical Center recognizes that some individuals may have difficulty accessing pre-natal services outside of the City. Accordingly, the Medical Center will continue to provide pre-natal services at the same location and with the same access as before the closure. Also, the Medical Center's OB physicians will be working with Mercy Medical Center to take on-call rotations at its birthing unit and deliver patients at that location. The Medical Center and Mercy Medical Center are working to finalize an agreement for such an arrangement. The Medical Center is also working with the Holyoke Health Center (FQHC) to ensure that the needs of their patient population are met.

3. Date for the closure of the Services.

- Thursday, October 1, 2020

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4. Names and addresses of any organized health care coalitions and community groups known to the Medical Center when the notice is issued to DPH that would have an interest in the closure of the Services. (Please list).

- Holyoke Health Center: 230 Maple Street, Holyoke, MA 01040

5. A detailed account of any community engagement and planning which has occurred prior to filing notice of the closure of the Services.

The Medical Center has engaged in planning with Mercy Medical Center for the transition of care of expectant mothers. It continues to engage with local stakeholders such as City Councilors and other local representatives. The purpose of such community engagement is to identify concerns with the closure of the Services and determine how they will be addressed. The Medical Center has also engaged with the local FQHC, Holyoke Health Center, to ensure that the population it serves continues to have access to pre-natal services.

Thank you for your attention to this matter. If you have any questions, please feel free to contact me or Andrew Ferrer, Esq.

Sincerely,

A handwritten signature in black ink, appearing to read "ASL", is positioned below the word "Sincerely,".

Andrew S. Levine

cc: A. DeMarco
S. Hatiras
K. Haynes, Esq., DPH
W. Mackie, DPH
A. Nardone, DPH

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

Holyoke Health Center