



The Commonwealth of Massachusetts
Executive Office of Health and Human Services
Department of Public Health
Bureau of Health Care Safety and Quality
Division of Health Care Facility Licensure and Certification
67 Forest Street, Marlborough, MA 01752

CHARLES D. BAKER
Governor

KARYN E. POLITO
Lieutenant Governor

September 12, 2022

MARYLOU SUDDERS
Secretary

MARGRET R. COOKE
Commissioner

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Daria Niewenhous
Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C.
One Financial Center
Boston, MA 02111
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BY EMAIL ONLY

Re: Review of Response Following Essential Services Finding
Facility: Shriners Hospital for Children - Springfield
Services: Discontinuation of Hospital Services
Ref. #: 2152-021

Dear Attorney Niewenhous:

On September 1, 2022, the Department of Public Health (the "Department") received from you, on behalf of The Shriners' Hospital for Children ("Shriners"), a response to our August 18, 2022, letter indicating Shriners must file a plan with the Department detailing how access to services will be maintained following the closure of Shriners Hospital for Children – Springfield (the "Hospital") and subsequent transition of the Springfield location to a clinic model. Thank you for responding to our request in a timely and comprehensive manner.

Pursuant to 105 CMR 130.122(G) the Department has completed its review of the submitted access plan. As a result of this review, the Department has prepared the following comments:

- 1. Timing of Transition to Clinic Model:** In your response dated September 1, 2022, you noted that, pending Department plan approval and licensing to open an outpatient clinic, patients who require inpatient or outpatient surgical care will be admitted to a nearby acute care hospital with pediatric critical care and supportive services for care by Shriners physicians, who will now be providing outpatient services at the proposed clinic. The Department requests that Shriners provide information on whether the Hospital will be able to close simultaneously with the opening of the proposed clinic and what the plan is if there is a delay in licensure of the proposed clinic.

2. **Assessment of Transportation Need Post Discontinuance:** In your response dated September 1, 2022, you noted that inpatient and outpatient surgical services may be performed at a local acute care hospital. Additionally, you noted in some cases, such as uninsured or out-of-state Medicaid plans for which the participating hospital is not in network, the Hospital *may* make arrangements with the family to provide care at another Shriners inpatient hospital location. The Department requests that Shriners provide additional information on the criteria which informs whether these arrangements will nor will not be made post discontinuance.

Under the provisions of 105 CMR 130.122(G), the Hospital must submit a timely response to the comments of the Department. Please submit your comments within 10 days of your receipt of this letter to my attention, in order that we may complete our review of the pending closure.

Thank you for your continued cooperation in this process. If you have any questions, please contact me at Stephen.Davis@Mass.Gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Stephen Davis". The signature is fluid and cursive, with the first name "Stephen" written in a larger, more prominent script than the last name "Davis".

Stephen Davis
Division Director

cc: E. Kelley, DPH
J. Bernice, DPH
A. Mehlman, DPH
R. Rodman, DPH
M. Callahan, DPH
K. Fillo, DPH