



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

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KARYN E. POLITO
Lieutenant Governor

June 6, 2022

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Secretary

MARGRET R. COOKE
Commissioner

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Zachary Redmond
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BY EMAIL ONLY

Re: Review of Response Following Essential Services Finding
Facility: Tufts Medical Center
Services: 10 Pediatric Intensive Care Unit Beds
57 Pediatric Medical Surgical Beds
Ref. #: 2299-H25

Dear Zachary Redmond:

On May 26, 2022, the Department of Public Health ("Department") received from you, on behalf of Tufts Medical Center, a response to our May 13, 2022, letter indicating that Tufts Medical Center ("Hospital") must file a plan with the Department detailing how access to services will be maintained following the discontinuation of 10 Pediatric Intensive Care Unit ("PICU") Beds and 57 Pediatric Medical Surgical ("Pediatric Unit") beds, and outpatient chemotherapy services to pediatric oncology patients. 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. **Alternative Care Sites:** In your response dated May 26, 2022, you provided information on Boston Children's Hospital's capacity to care for additional patients after the closure of the Hospital's PICU and Pediatric Unit. However, you did not include any other alternate care sites. Due to the scope and impact of the discontinuation of services, the Department requests information on the steps taken by the Hospital to ensure alternative care sites other than Boston Children's Hospital have the capacity to care for additional patients once the PICU and Pediatric Unit have been closed.

2. **Pediatric Leadership Council:** In your response dated May 26, 2022, you noted that Tufts Medicine has created a Pediatric Leadership Council including both community-based and Tufts Medical Center providers. The Department requests the Hospital provide it with additional information on the makeup of this council and address whether it represents the diversity of the community represented by the Hospital.
3. **Transportation and Interpreters:** In your response dated May 26, 2022, you indicated the Hospital will plan to make rideshare opportunities available to patients who need transport Boston Children's Hospital. Additionally, you indicated the Hospital will continue to offer interpreter services and that Boston Children's Hospital has available interpreter services. The Department requests the Hospital provide information on how it plans to make patients aware of the services available to them at both the Hospital and Boston Children's Hospital. The Department also requests the Hospital provide information on how patients who need transportation to alternative care sites other than Boston Children's Hospital will be accommodated.
4. **Costs and Acceptance of Insurance Plans:** In your response dated May 26, 2022, you reported that while Boston Children's Hospital had joined Tufts Medicine MassHealth ACO, matters such as cost sharing were outside of either hospital's control. The Department requests that the Hospital provide a description of the process that Boston Children's Hospital and the Hospital will employ to work with the insurer or guarantor's employer to ensure that any out of pocket expenses such as co-payments or deductibles do not reasonably exceed costs for care at the Hospital.
5. **Trauma Designation Status:** In your response dated May 26, 2022, you reported that the Hospital will "operate like other hospitals in the Commonwealth that do not maintain pediatric trauma designation". As over half of pediatric trauma cases arrive via private transport in MA, the Department requests that the Hospital briefly describe the staffing, equipment and oversight that will be in place to ensure the Hospital can adequately respond to pediatric trauma cases.
6. **Continuity of Care:** In your response dated May 26, 2022, you indicated the Hospital intends to continue to operate outpatient clinics and that services delivered at the Hospital will remain in place. The Department requests that the Hospital provide detailed information on how it intends to mitigate coverage gaps due to the loss of outpatient service providers. Additionally, the Department requests detailed information on how the Hospital plans to communicate service changes due to provider loss including options available to affected patients.

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 "Step Davis". The signature is written in a cursive, flowing style with a large initial "S" and a prominent "D".

Stephen Davis
Division Director

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