



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 & Certification
67 Forest Street, Marlborough, MA 01752

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Andrew Levine, Esq.
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BY EMAIL ONLY

Re: **Essential Services Finding**
Facility: Steward Satellite Emergency Facility - Quincy
Ref. #: 2QEQ-065

Dear Attorney Levine:

On September 1, 2020, the Department of Public Health (the "Department") held a public hearing in response to the notification received from you on behalf of Steward Carney Hospital, Inc. (the "Hospital") regarding their proposed plans to discontinue operation of Steward Satellite Emergency Facility – Quincy (the "SEF"), effective November 1, 2020. As a result of its review, the Department has made a finding that the services provided by the SEF are in fact necessary for preserving access and health status within the SEF's service area.

Accordingly, pursuant to 105 CMR 130.122(F), the Hospital is required to prepare a plan that details how access to SEF services will be maintained for the residents of the service area. The plan must be submitted to the Department no later than 15 calendar days of receipt of this letter. The Hospital's plan must include the elements specified in 105 CMR 130.122(F) as listed below:

- (1) Information on utilization of the services prior to proposed closure;

- (2) Information on the location and service capacity of alternative delivery sites. Include an explanation of the basis for the Hospital's determination that the alternative delivery sites **do** or **do not** have the capacity (necessary space, resources, etc.) to handle the increased patient volume at the identified sites. To support that assertion, please provide the following specific details:
 - (a) Current utilization at these alternative sites;
 - (b) Type of services available at the alternative sites;
 - (c) Type of medical diagnoses accepted; and
 - (d) Adequacy of space and resources at the alternative sites.
- (3) Travel times to alternative service delivery sites, for both peak and non-peak travel times, and an explanation as to the source for this information or what these estimates are based on;
- (4) An assessment of transportation needs post discontinuance and a plan for meeting those needs;
- (5) A protocol that details mechanisms to maintain continuity of care for current patients of the discontinued service; and
- (6) A protocol that describes how patients in the Hospital's service area will access the services at alternative delivery sites. The protocol should specifically address the following:
 - (a) The process that will be employed to effectively refer patients to other facilities or providers;
 - (b) The impact that this may have on the current occupancy rates at alternative delivery sites;
 - (c) The ability of the alternative delivery sites to meet the needs of these patients; and
 - (d) Other alternatives if medical needs cannot be accommodated at the proposed alternative sites.

In addition to the regulatory elements listed above, and in light of the Department's review of comments on the proposed closure, your plan must also address the following:

- (1) **Hours of Operation at Alternative Care Sites:** Based on testimony presented at the hearing on September 1, 2020, concern was expressed regarding the hours of operation of alternative care sites in Quincy, most of which are closed by 8pm. The plan which you are required to submit must include information on steps taken to ensure patients in the SEF's service area have access to emergency medical services 24 hours a day.
- (2) **Boarding Patients:** Based on testimony presented at the hearing on September 1, 2020, concern was expressed regarding the thousands of patients a year that have been boarding in the SEF while awaiting a mental health bed. The plan which you are required to submit must include

information on steps taken to ensure patients in need of a mental health bed will have access to an alternative care site that is open 24 hours a day while waiting for a bed.

- (3) **Patients without Insurance:** Based on testimony presented at the hearing on September 1, 2020, concern was expressed regarding homeless individuals not having access to services at urgent care centers that require some form of insurance. The plan which you are required to submit must include information on steps taken to ensure the uninsured homeless population of the SEF's service area have access to emergency medical services after the closure of the SEF.
- (4) **Cultural and Linguistic Needs of Population Served:** Your plan must include information on what the Hospital has done to assess the cultural and linguistic needs of the population it currently serves, what those needs have been determined to be; and to what extent the alternate sites identified as likely to provide care after the proposed closure will be able to address the needs identified.

Under the provisions of 105 CMR 130.122(G), the plan the Hospital submits to the Department will be reviewed to determine if it appropriately assures access to the essential services in question following the plans to discontinue operation of Steward Satellite Emergency Facility - Quincy.

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

Sincerely,



Sherman Lohnes
Division Director

cc: E. Kelley, DPH
S. Davis, DPH
R. Rodman, DPH
M. Callahan, DPH