

February 18, 2020

BY EMAIL

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:

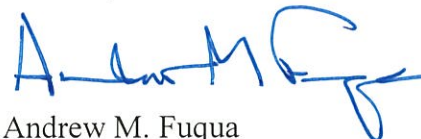
In response to notification provided by Cambridge Public Health Commission, d/b/a Cambridge Health Alliance ("CHA"), the Department of Public Health (the "Department") held a public hearing regarding CHA's plans to convert the satellite emergency facility at its CHA Somerville Hospital campus (the "Somerville SEF") to an urgent care center (the "Conversion"). The Department has determined that the satellite emergency facility services provided by CHA at the Somerville SEF are necessary for preserving access and health status within the CHA Somerville Hospital campus service area.

In accordance with 105 CMR 130.122(F), CHA hereby submits to the Department the attached plan detailing how access to emergency services will be maintained for residents of the CHA Somerville Hospital campus service area.

By this letter, CHA also formally informs the Department that the scheduled date of the Conversion has been moved from April 2, 2020 to April 30, 2020.

CHA looks forward to continuing its work with the Department, CHA staff and the community to safely effect the Conversion

Sincerely,

A handwritten signature in blue ink, appearing to read "Andrew M. Fuqua".

Andrew M. Fuqua
SVP and General Counsel

AFFILIATED WITH:



Beth Israel Deaconess
Medical Center



Mass General Hospital
for Children



HARVARD MEDICAL SCHOOL
TEACHING HOSPITAL



HARVARD
SCHOOL OF
DENTAL MEDICINE



HARVARD
SCHOOL OF
PUBLIC HEALTH



School of
Medicine

CAMBRIDGE HEALTH ALLIANCE
CONVERSION OF SOMERVILLE SEF TO CHA SOMERVILLE URGENT CARE CENTER
PLAN FOR CONTINUED ACCESS TO EMERGENCY SERVICES

A. Elements Specified in 105 CMR 130.122(F).

1. Information on utilization of the Somerville SEF prior to the Conversion.

Driven by changes in patient behavior, utilization of the Somerville SEF has been steadily declining as shown in the following table.

Year:	FY 2013	FY 2014	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020*
Visits:	19,288	17,849	17,701	18,138	17,334	16,256	15,959	9,035

* FY 2020 data is for the seven month period ended January 31, 2020.

Emergency Severity Index (ESI) data for the last four-plus years shows that approximately 60 percent of Somerville SEF patients present with conditions that could be treated in an urgent care setting (*i.e.*, ESI 4 or ESI 5.)

	FY16		FY17		FY18		FY19		7/1/19 – 1/31/19	
ESI-1	49	0%	38	0%	25	0%	30	0%	14	0%
ESI-2	1,119	6%	1,040	6%	939	6%	1,026	6%	661	7%
ESI-3	5,201	29%	5,136	30%	5,281	33%	5,545	35%	3,411	38%
ESI-4	10,310	58%	10,067	58%	9,070	56%	8,508	54%	4,600	51%
ESI-5	1,217	7%	988	6%	859	5%	789	5%	349	5%
Total*	17,896	100%	17,269	100%	16,174	100%	15,898	100%	9,035	100%

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

2. Information on the location and service capacity of alternative delivery sites.

After the Conversion, CHA will continue, without interruption, to provide access to emergency services for the patient population served by the Somerville SEF at CHA's nearby CHA Cambridge Hospital campus Emergency Department (the "Cambridge ED") while providing a new, more affordable option for patients with lower acuity conditions at the new CHA Somerville Urgent Care Center.

The Cambridge ED is located at 1493 Cambridge Street, Cambridge on the Somerville/Cambridge city line. According to Google Maps, the Cambridge ED is located between 1.7 and 1.9 miles driving distance from the Somerville SEF, depending on the route taken.

The Cambridge ED has more than sufficient capacity to care for all current Somerville SEF patients and certainly all current Somerville SEF patients with an ESI of 1, 2, or 3. Even if the entire patient population currently served by the Somerville SEF 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 SEF. 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 SEF has decreased.

Year	Cambridge ED Visits	Somerville SEF 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 SEF patients as shown in the following table.

Year	Cambridge ED Occupancy	Somerville SEF Occupancy	Cambridge ED Occupancy if Entire Somerville SEF 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 SEF. 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 SEF 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.

CHA does not anticipate that the entire Somerville SEF patient volume will seek care (or need to seek care) at the Cambridge ED. Instead, the new CHA Somerville Urgent Care

¹ CHA totaled the time from ED check-in to ED check-out for all of its patients at the Cambridge and Somerville SEFs 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.)

Center will be able to serve many of the same patients who currently go to the Somerville SEF. As shown above, approximately 60 percent of Somerville SEF 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 SEF 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.

3. Travel times to Cambridge ED.

According to Google Maps, the travel time from the Somerville SEF to the Cambridge ED is approximately 10 minutes, depending on the route taken. This time may vary based on ordinary course traffic factors and construction.

4. An assessment of transportation needs post discontinuance and a plan for meeting those needs.

Upon the Conversion, CHA will continue to provide emergency services without interruption at the nearby Cambridge ED. Like the Somerville SEF, the Cambridge ED is located on or near several MBTA bus lines. Given the geography of Somerville and the layout of streets in Cambridge and Somerville, patients who drive to the Somerville SEF will have either longer or shorter drives depending on their starting point. Finally, the Cambridge ED receives ambulances, and, as discussed below, CHA is collaborating with ambulance companies to ensure they bring patients to the Cambridge ED instead of the Somerville SEF.

5. A protocol that details mechanisms to maintain continuity of care for current patients of the discontinued service.

By its nature, emergency care is episodic. As more fully described in Section A.2 above, upon the Conversion, CHA will continue to provide emergency services at the Cambridge ED and urgent care services at the CHA Somerville Urgent Care Center to the patient population presently served by the Somerville SEF. CHA will care for all patients who present at the Cambridge ED or the CHA Somerville Urgent Care Center, regardless of ability to pay.

6. A protocol that describes how patients in CHA's service area will access the services at Alternative Delivery Sites.

As more fully described in Section A.2 above, upon the Conversion, CHA will continue to provide emergency services at the Cambridge ED and urgent care services at the CHA Somerville Urgent Care Center to the patient population presently served by the Somerville SEF. Public education about the Conversion, therefore, will be essential informing the public about (1) the continuing availability of emergency services at the Cambridge ED, (2) the new urgent care services at the CHA Somerville Urgent Care Center, and (3) the differences

between emergency and urgent care, including when it is appropriate to go to an emergency department or call “911”. CHA’s public education plan is set forth in Part B below.

B. Public Education; Cultural and Linguistic Needs of Population Served.

1. Public Education.

a. Plan to provide accurate and appropriate road signage in the Hospital’s service area.

Upon the Conversion, the CHA Somerville campus will convert from a hospital campus to a satellite location of CHA. CHA is currently working with the Somerville Department of Public Works to identify and remove all street signage directing people to this location as a hospital site with emergency services.

b. Public information campaign about the remaining services available at the Hospital, modifications in preexisting services, and the circumstances under which it is appropriate to call “911”.

CHA will be conducting an extensive multi-media public information campaign to educate the public about the Conversion and how to access emergency services. CHA’s messaging will initially focus on informing the public the Somerville SEF is closing. This initial messaging will remind the community to call “911” in an emergency and that emergency services are available at the Cambridge ED. The public education campaign will then shift focus to educating the public about urgent care services and the continuum of care while reinforcing that patients should call “911” or go to an emergency department in an emergency.

The campaign is designed to have a broad reach and frequency. It will include direct outreach to community and municipal organizations; traditional media advertising; social media; digital and traditional advertising; direct patient communications; and banners, posters, and other physical signage at the CHA Somerville Hospital campus. Of specific note, CHA will send letters to all senior households in Somerville and to any patient with more than two visits to the Somerville SEF in the last 18 months.

Set forth below are the different vehicles through which CHA plans to conduct the public education campaign.

- **Outreach**

- CHA newsletter, CHAC (see below), clinical partners (e.g., VNA), advocacy groups (e.g., NAMI)
- CHA’s Patient Family Advisory Council
- Grassroots through VNAs/CHI
- Banners, posters/flyers in community
- Chamber of Commerce
- Schools
- Police, Fire, EMTs, nearby EDs and Urgent Care

- **Advertising**

- Billboards (starting in March)
- Porter Square (bulletin)
- Broadway (poster)
- McGrath Highway (bulletins)
- Digital advertising (geo-targeted)
- Portuguese, Spanish and Haitian media
- Targeted direct mail
- Inside bus cards (starting in March)
- T-Station posters at Davis and Porter Sq.

- **Media**
 - Somerville Journal
 - Somerville News Weekly
 - SMC Somerville Neighborhood News
 - Somerville Patch
 - Somerville Scout (story once UC opens)
- **Social Media**
 - Facebook, Instagram, Twitter, LinkedIn
 - Boosted posts/sponsored content
 - City and other listservs
- **CHA**
 - CHA Website and non-CHA sites (SEO)
 - MyChart banner
 - Patient Newsletter and emails
 - Digital signage
 - Banners, posters/flyers
 - Vinyl window banners
 - External building banners (pending permits)

The following two examples illustrate how CHA anticipates members of the public will be informed and educated about the Conversion;

Carol is a CHA primary care patient living in Somerville. She is the mother of two young children, including one with asthma. She works in Boston and sometimes has trouble finding sick visit appointments that work with her busy schedule so she relies on evening walk-in visits to the Somerville SEF. She will learn about the changes from:

- Letter to frequent Somerville SEF users from Chief/ACNO
- MyChart message/banner
- CHA Patient Newsletter
- Digital ads on sites she frequently visits
- Ad cards inside buses she rides to get around town
- Boosted/sponsored social media posts

John is a 72 year old Medicare patient living at the Somerville VNA in an assisted living apartment. Although he has a PCP outside CHA, he prefers to make his own choices about where to seek care. He no longer drives and relies on the VNA and other service for rides. He doesn't know much about CHA and has never been to the Somerville SEF, but likes knowing there is a hospital emergency department nearby if needed. He will learn about the changes from:

- Articles in the Somerville Journal
- Communications from VNA leaders/staff
- Flyers/posters at senior gathering sites and events in Somerville
- Vinyl signs in windows of the Highland Building²
- Billboards he passes while traveling around town
- SMC/Neighborhood News and CHA appearances on local programs

CHA is also implementing safety measures. CHA has increased safety and security systems at the Somerville campus. It has installed blue light phones around the facility so that in an emergency, a person can press a button and be connected directly to CHA's

² The Highland Building is attached to, and architecturally part of, the CHA Somerville campus. It fronts on Highland Avenue while the rest of the campus is set back from this major thoroughfare.

24/7 security operations center. CHA will also be updating its wayfinding and external signage. This will include signage informing the public to call “911” or go to the Cambridge ED in an emergency.

- c. Written notification to ambulance services and regional councils, of the services to be provided at the Hospital and a description of the type of ambulance transport that is appropriate for the Hospital.

CHA holds regular meetings with the ambulance services serving CHA’s service area, including Cataldo Ambulance which provides EMS services for the City of Somerville, and has informed them of the Conversion.

CHA will send all such ambulance services written notice informing them that the Conversion will occur on April 30, 2020 and, effective that date, ambulance transport to the CHA Somerville campus for emergency services will no longer be appropriate. The notice will also reaffirm that CHA is continuing to provide emergency services, without interruption, at its nearby CHA Cambridge Hospital campus Emergency Department.

CHA will also send such a notice to the Metro Boston EMS Council.

- d. List of meetings to be held with public officials and the affected parties listed in 105 CMR 130.823.

Over the period between the date of this plan and April 30, 2020, CHA will hold meetings with parties listed below:

- Somerville Fire Department
- Somerville Police Department
- Metro Boston EMS Council
- Cataldo Ambulance
- Pro Ambulance
- Armstrong Ambulance Service
- the Somerville Board of Health
- the Public Health and Safety Committee of the Somerville City Council
- the Mayor of Somerville and representatives of his office.

- e. A clear and understandable description of the services that will remain at the Hospital and any changes in services currently provided at the Hospital; a plan for the dissemination of the description of services remaining at the Hospital, providing copies to the affected parties listed in 105 CMR 130.823 and including it in a public information campaign using local print and electronic media.

The Somerville SEF is located at the CHA Somerville Hospital campus. In addition to the SEF, the following services, all of which are ambulatory services, are currently provided at the campus:

- Medical, surgical, and women’s health specialty clinics in the campus’s North Building;
- GI and endoscopy services;
- Laboratory services;
- Imaging services; and
- Sleep lab and pulmonary function testing services.

In addition, CHA operates the Somerville Hospital Primary Care clinic and the CHA Eye Center in the adjoining Highland Building satellite.

Upon the Conversion, CHA will discontinue providing emergency services at the Somerville SEF space and will provide urgent care services in that space which will be renamed the CHA Somerville Urgent Care Center. Laboratory and imaging services will no longer operate on a 24/7 basis and will operate during daytime healthcare hours. There will be no other changes in services.

CHA will include the foregoing information regarding the changes in, and continuity of, services in the written notices it will be providing to the affected parties listed in Section B.1.c above.

The focus of CHA’s public information campaign will be on the conversion of the Somerville SEF to the CHA Somerville Urgent Care Center and is described more fully in Section B.1.b above.

- f. A plan to continue the ongoing exchange of information regarding emergency services with the community network created when the SEF was established.

CHA maintains ongoing communication with municipal emergency services providers and participates in Metro Boston EMS Council meetings. CHA holds regular meetings with the ambulance companies that transport patients to its Emergency Department locations. These activities serve as invaluable forums for sharing information regarding the services that CHA provides and for CHA learn about community health needs. They will continue after the Conversion.

In addition, CHA’s Community Health Advisory Council (“CHAC”) serves as a key forum for exchanging information. CHAC’s purpose is “to further ensure that stakeholders in the communities will have a vehicle through which to provide input to the CHA Board and management regarding community and public health issues.” CHAC members collaborate with assessing current community health gaps and needs, are involved with identification of community and public health priorities across CHA service areas and helps develop strategies for community health improvement. CHAC members include representatives of social service and advocacy organizations; representatives of community coalitions; resident leaders; and representative from the cities of Cambridge, Somerville, Malden and Everett.

2. Cultural and Linguistic Needs of Population Served: Information on what CHA 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.

CHA is committed to meeting the cultural and linguistic needs of its patients. CHA serves one of the most linguistically and culturally diverse patient populations in the United States. Over half of its patients speak a language other than English at home. Approximately 43% of patients at CHA have limited English proficiency and require the services of a professional medical interpreter. Addressing health inequities arising from cultural and linguistic barriers to care and meeting the cultural and linguistic needs of its populations is a priority for CHA across all services it provides.

CHA provides extensive cultural and linguistic support to its patients through its Multicultural Affairs and Patient Services department ("MAPS"). MAPS regularly provides interpreter services in more than sixty languages to all CHA sites. Interpreter services also handle requests for the deaf or hard of hearing, including American Sign Language and CDI services. To help bridge cultural and linguistic gaps, MAPS provides professional medical interpreters via face-to-face, telephonic and video conference; professional written translation services for forms, signage, and patient materials; cultural and linguistic education for clinical and non-clinical staff; and language proficiency testing for bilingual providers. In FY2019 alone, MAPS provided interpreter services to over 54,000 unique patients in over 351,000 encounters.

CHA will continue to provide the full-range of its cultural, linguistic and other support services to patients presenting at the Cambridge ED and will provide these same services at the new CHA Somerville Urgent Care Center.