

Springfield, MA Pediatric Specialty Care

September 1, 2022

BY EMAIL ONLY:

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Stephen Davis
Division Director
Division of Health Care Facility Licensure & Certification
Massachusetts Department of Public Health
67 Forest Street,
Marlborough, MA 01752

Re: Essential Services Finding

Facility: Shriners Hospital for Children - Springfield **Services:** Discontinuation of Hospital Services

Ref. #: 2152-021

Dear Mr. Davis:

On August 4, 2022, the Department of Public Health (the "Department") held a public hearing in response to a notification on behalf of The Shriners' Hospital for Children ("Shriners") regarding proposed plans to close Shriners Hospital for Children – Springfield (the "Hospital") (the "Hospital Services"), effective October 31, 2022, subject to receipt of all necessary permits and approvals. By letter dated August 18, 2023 (the "Letter"), the Department notified the Hospital that it found the Service necessary for preserving access and health status within the Hospital's service area and that the Hospital is required to prepare a plan that details how access to hospital services will be maintained for the residents of the service area, pursuant to 105 CMR 130.122(F).

Accordingly, this letter details how access to pediatric hospital services currently provided at the Hospital will be maintained for the residents of the Hospital's service area. The Hospital's plan includes the elements specified in the Letter as set forth below.

(1) Information on utilization of the Hospital Services prior to proposed closure.

The Hospital originally opened on February 25, 1925; the current Hospital opened on the same site on September 29, 1990 providing inpatient and outpatient pediatric specialty care to children from across the northeast. Shriners Children's has proposed to permanently close the Hospital Service effective October 31, 2022 due to low utilization. Since the opening of the current hospital in 1990, the number and duration of inpatient stays for pediatric specialty care has decreased because of changes in how pediatric care is delivered. Over the past 10 years, the average daily census ("ADC") has averaged 1.6 patients. From January 1, 2021 through December 31, 2021, 79 children were discharged from inpatient stays at the Hospital and the ADC ("ADC") was 0.4 with an additional 529 outpatient surgeries and 13,234 non-surgical outpatient encounters. The bed utilization rate for this 20 bed Hospital was less than 2% in 2021 and is projected to be approximately 1% in 2022.

Utilization	2018	2019	2020	2021	
Inpatient Discharges	144	121	70	79	
Outpatient Surgeries	586	581	314	529	
Outpatient Encounters	15,780	15,251	9,589	13,234	
Average Daily Census	2.0	3.0	0.9	0.4	
Patient Days	736	1,085	362	134	

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

Shriners plans to continue to deliver all non-surgical outpatient services currently being delivered using an outpatient clinic model. Currently, patients who require inpatient or outpatient surgical care are admitted to the Hospital for care by Hospital-employed physicians. These physicians typically have medical staff privileges, including surgical privileges as applicable, at one or more nearby hospitals. In the planned model, pending Department plan approval and licensing to open an outpatient clinic in portions of the premises currently used for the Hospital's non-surgical outpatient services, patients who require inpatient or outpatient surgical care will be admitted to a nearby acute care hospital with pediatric critical care and other supportive services for care by Shriners physicians, who will now be providing outpatient services at the proposed clinic., or by other physicians of their choice. Care through this model will be provided in the right setting at hospitals with intensive care and other supportive pediatric services that are not currently available at the Hospital. This will result in an overall enhanced quality of care provided to patients receiving inpatient and outpatient surgical care. All outpatient services would continue at the current location.

During 2021, the Hospital provided Hospital Services to patients from Massachusetts, Connecticut, Maine, Vermont, New Hampshire, Rhode Island, Florida and eastern New York. The number of inpatient discharges and outpatient surgeries during 2021 from the Service by state is shown in the table below:

State	Inpatient Discharges	Outpatient Surgeries
Massachusetts	44	383
New York	18	93
Connecticut	6	20
Maine	6	20
Vermont	4	6
Florida	1	2
New Hampshire	0	3
Rhode Island	0	2
Total	79	529

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¹ Note to Shriners: Please confirm.

Within these regions, based upon publicly available information, including hospital websites, there are alternative delivery sites with adequate space, skill, and resources to handle the increased patient volumes from patients who would be eligible for admission to the Hospital for inpatient services or ambulatory surgery services ("Patients").

Alternative Care Delivery Sites

Massachusetts	Boston Children's Hospital Boston, MA https://www.childrenshospital.org/	With more than 40 clinical departments and 258 specialized clinical programs, Boston Children's is one of the largest pediatric medical centers in the United States.
	UMass Memorial Medical Center Worcester, MA https://www.ummhealth.org/umass-memorial- medical-center/services-treatments/childrens- medical-centerpediatrics	More than 200 medical and surgical experts in more than 30 specialties devote their expertise to the care of infants, children and adolescents.
	Baystate Children's Hospital Springfield, MA https://www.baystatehealth.org/locations/childrens- hospital	Provides a broad range of pediatric specialty care.
New York	Albany Medical Center Albany, NY https://www.amc.edu/patient/pediatric.cfm	Provides a broad range of pediatric specialty care.
Connecticut	Connecticut Children's Medical Center Hartford, CT https://www.connecticutchildrens.org/	Provides a full range of pediatric specialty care.

Maine	The Barbara Bush Children's Hospital at Maine Medical Center Portland, ME https://www.mainehealth.org/Barbara-Bush-Childrens-Hospital/About	Maine's only full- service children's hospital offers everything from well-child visits to specialized medical and surgical treatment of complex pediatric illnesses and injuries.
Vermont	The University of Vermont Children's Hospital Burlington, VT https://www.uvmhealth.org/childrens-hospital/pediatric-specialties	Provides a full range of specialties offered at the University of Vermont Children's Hospital. Pediatric surgical
New Hampshire	I shanon NH	
Rhode Island	Hasbro Children's Hospital Providence, RI https://www.lifespan.org/locations/hasbro-childrens-hospital https://www.lifespan.org/locations/hasbro-childrens-hospital	A team of more than 200 physicians and 130 nurses provides expertise in more than 40 pediatric specialty areas including cardiology, orthopedics, oncology, gastroenterology, neurology, surgery and many more.

Other specific information requested regarding alternative sites (utilization, medical diagnosis, space) is not publically available, but Shriners presumes that each alternative site is capable of providing the services for which it is licensed in accordance with applicable requirements.

(3) Travel times to alternative delivery sites.

The table below shows approximate travel times from Shriners Hospitals for Children – Springfield to alternative care delivery sites during peak and non-peak travel times. All travel times (hours: minutes) were calculated using Google Maps.

Alternative Care Delivery Site	Travel Time to Springfield Area	
	Non-Peak	Peak
Baystate Children's Hospital – <1 mile Springfield, MA	0:05	0:05
Boston Children's Hospital – 89 miles Boston, MA	1:20	2:00
UMass Memorial Medical Center – 53 miles Worcester, MA	0:50	1:05
Connecticut Children's Medical Center – 29 miles Hartford, CT	0:30	0:45
Children's Hospital at Dartmouth – 129 miles Lebanon, NH	2:00	2:40
Albany Medical Center – 86 miles Albany, NY	1:25	1:50
Hasbro Children's Hospital – 84 miles Providence, RI	1:25	2:00
The University of Vermont Children's Hospital – 208 miles Burlington, VT	3:00	3:40
The Barbara Bush Children's Hospital at Maine Medical Center– 190 miles Portland, ME	2:50	3:40

(4) Assessment of transportation need post discontinuance.

Discontinuance of the Hospital's inpatient and ambulatory surgery Hospital Services will not put additional burden for transportation on most patients. Inpatient and outpatient surgical services may be performed at a local acute care hospital such as Baystate Children's Hospital, less than 1 mile from the current location of Shriners Children's. 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 Children's location in Boston, Philadelphia or another Shriners inpatient hospital location. Shriners provides transportation and housing assistance based on financial need through Shriners International, the fraternal organization that supports Shriners Hospitals. All outpatient services, other than surgery services, will continue in their current location.

- (5) Under the outpatient clinic model, current patients will be able to continue to receive outpatient services, other than surgery services, at the current location from Shriners providers. Whenever possible, inpatient and outpatient surgical care will be provided at another local acute care hospital by Shriner's surgeons and follow-up care, as appropriate, will be available under the clinic model at the current location.
- (6) Patients within the Hospital's service area will access inpatient and outpatient surgical services at alternative delivery sites through the assistance of Shriners' care managers. Most of the inpatient and outpatient surgical care will take place at a local acute care hospital in the Springfield area by the patient's current Shriners surgeon. Care managers will schedule the date, time and location of the surgery to take place. Given the Hospital's low inpatient volume, and the distribution of originating Patients across several states, occupancy rates at alternative delivery sites should be immaterial and other sites should be

able to meet the needs of Patients. To our knowledge, all of the alternative sites have adequate space, staff and expertise to meet the needs of these Patients.

Specialty Services

In addition to the regulatory elements listed above, the Department requested a list of current outpatient services provided by the Hospital and indicate whether any of these services will be discontinued or changed in any way after Shriners has completed the transition to a clinic model.

The Hospital plans to continue all outpatient services currently provided once it transitions to an outpatient clinic, subject to receipt of all necessary licenses, permits and approvals.²

Service	Description	Plan
Outpatient Medical Clinical Practice	Outpatient specialty visits with physicians or other advanced practice providers	Continue in current location under clinic license; no change in service level
Rehabilitation services	Physical, occupational and speech therapy outpatient services	Continue in current location under clinic license; no change in service level
Motion Analysis Center	Outpatient assessment of movement for documentation, treatment planning and treatment effectiveness	Continue in current location under clinic license; no change in service level
Imaging Services	Outpatient radiology services	Continue in current location under clinic license; no change in service level

Shriners remains committed to our mission of providing the highest quality care for children with neuromusculoskeletal conditions, and other special healthcare needs within a compassionate, family-centered and collaborative environment, to provide for the education of physicians and other healthcare professionals, and to conduct research to discover new knowledge that improves quality of care and quality of life of children and families regardless of the ability of a patient or family to pay.

² Although not a Hospital Service under the Hospital license, Pediatric Outpatient Prosthetic Services (POPS), a Shriners affiliate that provides outpatient orthotic and prosthetic services to Shriners patients, will continue to provide such services to Shriners outpatients in its current space when Shriners transitions to a clinic model. POPS is a durable medical equipment supplier that is not subject to hospital or clinic licensure.

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We welcome any questions you might have and will continue work with the Department of Public Health throughout the process.

Sincerely,

Edward Geoffrion

Chairman, Board of Governors

Frances Marthone PhD, RN

James Man Ghane

Hospital Administrator