August 27, 2021



Via E-Mail

Sherman Lohnes, Esq., Director Division of Health Care Facility Licensure and Certification Massachusetts Department of Public Health 67 Forest Street Marlborough, MA 01752

> Re: <u>Anna Jaques Hospital – Second Response to DPH Regarding Inpatient Pediatric</u> Service Closure

Dear Attorney Lohnes:

On behalf of Anna Jaques Hospital ("the Hospital"), please find a response to the Department of Public Health's (the "Department") correspondence, dated August 18, 2021, concerning the Hospital's plan for closure of its inpatient pediatric service. In compliance with the regulatory requirements at 105 C.M.R. 130.122(G), the Hospital offers the following response to the Department's additional questions below.

1. Pediatric Advisory Committee: In your response dated August 10, 2021, you noted that the Pediatric Advisory Committee (the "PAC") included pediatricians, ENT surgeons and emergency physicians who are familiar with the diversity of the community served by the Hospital. The Department requests the Hospital clarify whether it has considered the feasibility of including individuals who reflect the diversity of the Hospital's service area as PAC members.

As the PAC is newly formed and has only held two preliminary meetings, the committee's development is still underway. The PAC is currently comprised of providers from several specialties areas and professions who work directly with the diverse members of the community. The Hospital is seeking to add at least one community representative as a member of the PAC who is representative of the diversity of the community the Hospital serves.

2. Pediatric Patients in the Emergency Department: Based on opening remarks given by the Hospital at the July 20th hearing, it is the understanding of the Department that the Hospital will continue to serve pediatric patients who present to the Emergency Department and will arrange transfers for pediatric patients who require inpatient admission. The Department requests additional information on the Hospital's ability to take care of pediatric patients in the Emergency Department, including those in need of a behavioral health evaluation.

The Hospital's Emergency Department ("ED") will continue to provide high quality care to pediatric patients following existing pediatric-specific policies and guidelines. All ED

Sherman Lohnes, Esq., Director Division of Health Care Facility Licensure and Certification Massachusetts Department of Public Health August 27, 2021 Page 2

physicians and nurses are required to have current education and certifications on pediatric resuscitation and trauma care, including Pediatric Advanced Life Support (PALS) and Trauma Nurse Core Curriculum (TNCC) which has a section focusing on pediatric trauma. The ED is equipped with pediatric-specific equipment, such as a Breslow Resuscitation Cart and pediatric video airway management devices. The Hospital's level 1B Neonatal Care Center is available for all pregnant and newborn emergencies and consultations.

As a level III Trauma Center accredited through the American College of Surgeons, the Hospital's Trauma Manager oversees the continuity of care provided for all Emergency Medical Services (EMS) transports including Advance Life Support (ALS) and Basic Life Support (BLS) for the pediatric and adult population. The ED Leadership Providers are involved in the Massachusetts Pediatric Emergency Care Coordinator Network (MPECC), a resource that provides best pediatric practices in emergency medicine. The resource has guided the department by using a National Pediatric Readiness Assessment. With the help of MPECC, the ED developed a pediatric psychiatry activity box. The box contains an activity guide for various age groups along with supplies to support the activity.

Pediatric and adolescent patients who present to the Hospital's ED will be triaged in the ED for behavioral health needs in accordance with existing policies and procedures. For example, once the patient has obtained a medical screening exam and is medically cleared by the treating clinician, and the clinician has determined the patient needs a mental health screening, the Emergency Screener for Psychiatry will be notified. If the patient requires placement at an inpatient facility, the patient will be prioritized for placement in the Hospital's child and adolescent psychiatric inpatient satellite located in Amesbury. Given the continued need for inpatient psychiatric beds in the Commonwealth, the Hospital has received approval to expand its existing 12-bed child and adolescent inpatient unit to 16 beds. This increased capacity will improve access to inpatient psychiatric care for patients ages 4-17 and will reduce wait times in the ED for patient requiring transfer to the facility.

In accordance with the above, the Hospital remains committed to emergency treatment of pediatric patients who present to the ED, including those with behavioral health needs.

We thank you for your attention to this matter. Please do not hesitate to contact me or Andrew S. Levine, Esq. at (781) 898-4379 if you have any questions or require additional information.

Mark Goldstein

President

Anna Jaques Hospital

Sherman Lohnes, Esq., Director Division of Health Care Facility Licensure and Certification Massachusetts Department of Public Health August 27, 2021 Page 3

cc:

- S. Boyd, Esq., AJH
- M. Callahan, Esq., DPH
- S. Carlson, DPH
- S. Davis, DPH
- R. Kaye, Esq., DPH
- E. Kelley, DPH
- A. Levine, Esq.
- W. Mackie, DPH
- R. Maki, AJH
- D. Perry, AJH
- R. Rodman, Esq., DPH
- M. Schuyler, AJH
- M. Smith-Mady, Esq.
- M. Taberner, Esq., AJH