

# Baystate Health

May 17, 2021

**VIA EMAIL ONLY**

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

**Re: Baystate Wing Hospital Corporation – Baystate Mary Lane Outpatient Center  
 Response to Review of Response Following Essential Services Finding  
 Ref. # 2PW2-008**

Dear Mr. Lohnes:

I am writing on behalf of Baystate Wing Hospital Corporation (“BWH”) in response to your letter dated May 7, 2021, which set forth comments by the Department of Public Health (the “Department”) concerning the access plan and related information submitted by BWH pursuant to 105 CMR 130.122 regarding the closure of the satellite emergency facility (“SEF”) and the transition of non-emergency hospital-based services currently located at Baystate Mary Lane Outpatient Center (“Mary Lane”). BWH’s response to the Department’s comments is set forth below.

**Emergency Services Utilization:** As expected, data retrieved for purposes of preparing this response show a decline in the total number of visits to the SEF and to the emergency departments at BWH and Baystate Medical Center (“BMC”) during the pandemic. During this time, there was a corresponding decrease in average wait times at each site (defined as the time the patient arrived at the emergency department to being moved to a treatment bed). BWH and BMC anticipate that when volumes return to pre-COVID levels, wait times will do so as well.

**Satellite Emergency Facility**

	2019 Visits	2019 Wait	2020 Visits	2020 Wait	2021 Visits	2021 Wait
<b>January</b>	1,007	0:09	1,112	0:11	810	0:07
<b>February</b>	927	0:10	1,067	0:11	598	0:06
<b>March</b>	1,022	0:10	807	0:08	701	0:07
<b>April</b>	962	0:09	508	0:08	705	0:08
<b>May</b>	1,018	0:10	609	0:07		
<b>June</b>	1,063	0:10	739	0:09		
<b>July</b>	1,056	0:10	910	0:09		
<b>August</b>	1,034	0:10	961	0:09		
<b>September</b>	1,079	0:10	802	0:08		
<b>October</b>	1,008	0:11	862	0:07		
<b>November</b>	883	0:09	772	0:07		
<b>December</b>	980	0:10	741	0:07		

**Baystate Wing Hospital Emergency Department**

	2019 Visits	2019 Wait	2020 Visits	2020 Wait	2021 Visits	2021 Wait
<b>January</b>	1,964	0:14	2,259	0:21	1,742	0:17
<b>February</b>	1,851	0:15	2,046	0:21	1,483	0:12
<b>March</b>	1,952	0:15	1,618	0:13	1,797	0:15
<b>April</b>	1,825	0:12	1,081	0:09	1,870	0:20
<b>May</b>	2,045	0:13	1,393	0:09		
<b>June</b>	1,981	0:13	1,619	0:12		
<b>July</b>	2,143	0:12	1,835	0:14		
<b>August</b>	2,008	0:12	1,879	0:14		
<b>September</b>	2,092	0:14	1,758	0:16		
<b>October</b>	2,016	0:14	1,688	0:14		
<b>November</b>	1,843	0:12	1,713	0:15		
<b>December</b>	2,016	0:12	1,701	0:16		

**Baystate Medical Center Emergency Department**

	2019 Visits	2019 Wait	2020 Visits	2020 Wait	2021 Visits	2021 Wait
<b>January</b>	10,867	0:26	12,068	0:30	7,555	0:15
<b>February</b>	9,462	0:23	10,001	0:22	7,130	0:16
<b>March</b>	10,529	0:23	7,649	0:09	8,249	0:16
<b>April</b>	10,148	0:18	5,103	0:06	8,459	0:19
<b>May</b>	10,681	0:21	6,563	0:08		
<b>June</b>	9,914	0:20	7,347	0:11		
<b>July</b>	10,314	0:18	7,943	0:15		
<b>August</b>	10,236	0:16	7,927	0:16		
<b>September</b>	10,211	0:21	7,944	0:17		
<b>October</b>	10,085	0:17	7,661	0:16		
<b>November</b>	9,785	0:21	7,282	0:15		
<b>December</b>	10,704	0:23	7,290	0:14		

Due to the fact that emergency department visit data for calendar years 2019 and 2020 are not available, BWH contacted representatives from each of the other alternative sites regarding the Department's questions. A representative from Harrington Hospital indicated that the number of emergency department visits fell during the pandemic, and although volume has fluctuated, emergency department visits are currently 8-10% below pre-COVID levels. Harrington noted that wait times are typically low, and it does not anticipate significant increases in wait times should volume return to, or exceed, pre-COVID levels. BWH is awaiting responses from the other alternative sites and will update the Department on any additional responses it receives.

**Signage:** BWH will conduct an inventory of current signage to ensure that once emergency services are closed at the SEF, all signage referencing the SEF and emergency services is removed. Given that outpatient rehabilitation and outpatient radiology and imaging services are not expected to transition to BWH's Palmer site for approximately two years, it would be premature at this stage to include references on signage at Mary Lane to the eventual discontinuation of these hospital-based services. BWH will ensure that as non-emergency hospital-based services are transitioned away from Mary Lane, appropriate changes are made to signage to avoid confusion to patients and members of the public.

**Outreach to Local Emergency Medical Services:** As noted in BWH's access plan dated April 30, 2021, BWH has a history of close collaboration with local EMS providers that predates the closure announcement, including regular meetings to address issues related to the delivery of EMS services. Since the announcement, representatives of the Baystate Health Division of Pre-Hospital and Disaster Medicine have met at least once with the leadership of the seven EMS providers in the service area, including three meetings with Ware, two with Warren, and three with West Brookfield. BWH is committed to continuing its collaboration with EMS providers in the service area through the transition and beyond and to ensuring that these providers have up-to-date information about emergency services in the Baystate Health Eastern Region.

#### **Engagement with Community Groups:**

To the extent they were not made clear in its earlier filings with the Department, BWH would like to reiterate its communications with members of the public and local officials concerning the changes at Mary Lane, which included the following between the initial public notice of the changes on January 26, 2021 and notice to the Department on February 26, 2021:

- **January 26, 2021:** WebEx for community stakeholders, including the Baystate Health Eastern Region Patient Family Advisory Council and Community Benefits Advisory Council ("CBAC"), local legislators, Ware and Palmer Town Managers, EMS directors and police chiefs from communities in the Eastern Region, and key community partners, including Quaboag Hills Community Coalition, Quaboag Hills Substance Use Alliance, and Common Goal Seeds of Hope Committee.
- **January 26, 2021:** Launch of website landing page, [Baystatehealth.Org/EasternRegion](http://Baystatehealth.Org/EasternRegion), which includes a letter to the community, Q&A, and an email link to solicit input.
- **February 11, 2021:** Direct mailing to 52,559 households in the service area sharing plans for the Eastern Region.
- **February 23, 2021:** Community Town Hall via Zoom attended by 115 individuals, including 72 community members and 16 town/government representatives; promotion began via radio, print media, and Baystate Health website on February 1, 2021.

Communication with the public and local officials regarding the planned changes at Mary Lane has continued since the notice to the Department in February. The CBAC – which has strong representation from the Ware community and Mary Lane service area, including the Town Manager, the Executive Director of the Quaboag Valley CDC, the Superintendent of the Ware Public Schools, and the Ware Council on Aging – meets monthly. At each meeting, including the most recent one on May 14, 2021, Molly Gray, President & Chief Administrative Officer of BWH and the Baystate Health Eastern Region, provides an update on Mary Lane and an opportunity for questions and input. These monthly meetings will continue to provide a setting

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in which to engage community members about the changes at Mary Lane and plans to ensure access to services.

Baystate Health representatives met today with local officials, including State Senator Anne Gobi, State Representative Todd Smola, and Ware Town Manager Stuart Beckley. A key goal for this meeting was to establish channels for regular communications between Baystate Health and local officials to ensure ongoing opportunities for dialogue about access to services to patients in the communities they represent.

Please contact me in the event you have any questions regarding this letter or need any additional information.

Very truly yours,

A handwritten signature in black ink that reads "Vanessa L. Smith". The signature is written in a cursive, flowing style.

Vanessa L. Smith, Esq.  
Senior Vice President & Chief Legal Officer  
Baystate Health, Inc.