

March 6, 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:

By letter dated February 25, 2020, the Department of Public Health (the “Department”) provided comments to the plan submitted by Cambridge Public Health Commission, d/b/a Cambridge Health Alliance (“CHA”), detailing how access to emergency services will be maintained for residents of the CHA Somerville Hospital campus service area following the conversion of CHA’s satellite emergency facility at its CHA Somerville Hospital campus (the “Somerville SEF”) to an urgent care center. This letter responds to the Department’s comments.

1. Information on Alternative Delivery Sites.

Sites and Addresses. In addition to CHA’s Cambridge Hospital campus Emergency Department, CHA has identified the following alternative delivery sites of emergency services for residents of the CHA Somerville Hospital campus service area:

1. Mount Auburn Hospital Emergency Department
330 Mt Auburn St, Cambridge, MA 02138
2. Massachusetts General Hospital Emergency Department
55 Fruit Street, Boston, MA 02114
3. Winchester Hospital Emergency Department
41 Highland Avenue, Winchester, MA 01890

Travel Times. Given the shape and geography of Somerville, the following table shows travel times to the alternative delivery sites from addresses in East Somerville, West Somerville (Davis-Teele Squares), and the Somerville Hospital campus in central Somerville.

AFFILIATED WITH:



	Travel Times*		
	115 Broadway (East Somerville)	230 Highland Avenue (Somerville Hospital)	167 Holland Street (West Somerville)
CHA Cambridge Hospital	12 minutes	12 minutes	14 minutes
Mount Auburn Hospital	20 minutes	14 minutes	12 minutes
Mass. General Hospital	16 minutes	20 minutes	28 minutes
Winchester Hospital	22 minutes	27 minutes	18 minutes

* Approximate times according to Google Maps at approximately 4:45 pm on March 3, 2020.

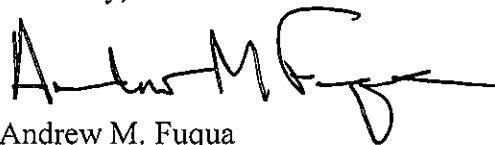
Service Capacity. Because industry-wide numbers regarding the service capacity of emergency departments are not available, CHA's Chief of Emergency Medicine has spoken directly with the incoming Chair of Emergency Medicine at Mount Auburn Hospital and the Executive Vice-Chair of the Department of Emergency Medicine at Massachusetts General Hospital and confirmed with each that their facilities have the capacity to take patients who might otherwise have gone to the Somerville SEF. CHA's Chief of Emergency Medicine has also attempted to contact the Chief of Emergency Medicine at Winchester Hospital, but the two have been able to speak directly yet. CHA will inform the Department of the results of this conversation once it happens.

2. Protocols for Emergent Patients

Attached please find a protocol* for assessing the level of care required for patients presenting at the new Somerville urgent care center and, if necessary, the related transfer, communication, and transport processes to be followed. To further inform the Department's review of this protocol, the new urgent care center at the CHA Somerville campus will be staffed by board-certified CHA emergency physicians. These physicians will rotate through the urgent care center in addition to practicing at CHA's Emergency Department locations at the CHA Cambridge Hospital and CHA Everett Hospital campuses.

CHA looks forward to its ongoing collaboration with the Department, CHA staff and the community to safely effect this transition.

Sincerely,



Andrew M. Fuqua
SVP and General Counsel

* This protocol remains subject to final approval and adoption. As with all such protocols, CHA will review and revise this protocol from time to time.

**Patient Transfer/Emergent Transport Policy
(Subject to Final Approval and Further Revision)**

Cambridge Health Alliance has an organized mechanism to respond and provide urgent/emergent medical attention for patients, visitors or staff who sustain minor injury or develop an acute medical condition at the CHA-Somerville Urgent Care. All staff must be familiar with this policy.

- 1) In the case of a patient/visitor presenting in severe distress (cardiac arrest, unconsciousness, active labor):
 - a. Staff should immediately call for help.
 - b. Staff should Immediately call 9-911. The emergency dispatcher will ask for the location of the emergency. The address of Cambridge Health Alliance-Somerville Campus, 33 Tower Street should be given. Staff are to identify exactly where the emergency is located, for example: 1st floor, Urgent Care Center.
 - c. During the hours of Urgent Care operations, the Urgent Care attending physician along with Urgent Care staff will respond until the EMS/911 team arrives and the patient/visitor may be transferred.
 - i. During the hours when Urgent Care is open, the response team will consist of the urgent care attending physician and nurse. The nurse will respond with the advanced emergency off-site kit, portable oxygen and AED.
 1. **Role of the urgent care attending physician in a Medical Emergency:**
 1. Functions as the Team Leader and clearly identifies him/herself as such.
 2. Works collaboratively with team members to assure that the best and most efficient care is provided to the patient.
 3. Assures that all delegated tasks are performed appropriately.
 4. Communicates with the 911 team.
 5. Communicates with the receiving hospital, as appropriate
 6. Documents event and response appropriately in patient's online medical record, if applicable.
 - ii. The staff person at the main reception desk will direct the EMS personnel.
 - iii. Once EMS personnel have arrived, the urgent care attending physician shall communicate relevant information to the EMS team.
 - iv. Patients will be transported to the nearest or most appropriate emergency department according to state OEMS protocols.
- 2) For a patient who arrives to Urgent Care with a high-risk complaint (e.g. chest pain, allergic reaction, weakness):
 - a. All patients who present to the urgent care center to be evaluated should be brought directly to an available room.

- b. Registration staff should immediately notify the nurse or physician for any patient who appears in distress (e.g. severe pain, difficulty speaking, difficulty breathing)
 - c. Patients will be immediately evaluated by the urgent care attending physician.
 - d. If the urgent care attending physician determines that the patient needs to be transported to an emergency department immediately, call Cataldo Ambulance at 617-XXX-XXXX and request a STAT transfer.
 - e. If the urgent care physician determines that the patient needs to be transported to an emergency department non-emergently, call Cataldo Ambulance at 617-XXX-XXXX and request a transfer with the appropriate level of ambulance (ALS vs BLS).
 - f. Location provided to the ambulance service should be CHA Somerville Campus, 33 Tower Street, 1st floor, Urgent Care.
 - g. Patients will be registered after physician evaluation.
- 3) Sometimes due to a change in a patient's status there requires a need to transport a patient from urgent care to an emergency department. The preference is to keep patients within the CHA system, however, safety of the patient and urgency of transfer will dictate where the patient is ultimately transported. The urgent care attending physician will assess the patient and this assessment will indicate if the patient needs to be transferred to the nearest institution that can provide the level of care needed.
- a. The urgent care attending physician will assess the patient. The assessment will determine the mode of transportation and recommended facility.
 - b. The urgent care physician or designated nurse will notify the receiving hospital of the potential referral transfer.
 - c. If the patient is unstable the staff will be directed to call the Somerville Fire Department at 9-911.
 - d. If the patient is stable, Cataldo Ambulance will be called at 617-XXX-YYYY.
 - e. The urgent care physician or designee is to notify family members.
 - f. Patient's belongings and valuables will be sent with the patient
 - g. A copy of relevant portions of the clinical record will be sent with the patient to the receiving facility.