

Determination of Need Program
MA Department of Public Health
250 Washington St.
Boston, MA 02108

Nov. 9, 2023

Re: The Children's Medical Center Corporation/Franciscan Hospital – Hospital/Clinic Substantial Capital Expenditure

Dear Determination of Need Program,

I am writing to support the Children's Medical Center/Franciscan Children's Determination of Need application to revitalize its facility in Brighton. Franciscan Children's is a critical institution to the health care and educational landscape, serving children with complex medical, mental health, and educational needs from neighborhoods across Boston, the state, and the New England region.

Through the proposed project, Franciscan Children's will construct a state-of-the-art, family friendly facility to meet both the existing and growing needs of children who require behavioral health and rehabilitative care. In addition, Franciscan Children's will expand services to children who require dental surgery through expansion of its existing operating room capacity.

My son spent eight months at Franciscan after being discharged from a NICU in Springfield, MA, where he spent the first six months of his life after being born extremely prematurely. When he was transferred to Franciscan, was much sicker than typical Franciscan patients. He required high levels of continual oxygen support and continua round-the-clock medical care. Had it not been for Franciscan, my son would have had to remain in an ICU setting for twice as long at least. We were told by our NICU neonatologist that there were only two rehabilitation facilities capable of taking my son, in all of his medical complexity, in the country.

As a medical writer for Boston Children's myself, I know that a busy, loud ICU setting is detrimental to a child's development for a long list of reasons, and I was grateful to bring him to the quieter, intimate space at Franciscans, where we could be with him at his bedside more easily, and where he could start to get the OT, PT, eating and speech therapy he desperately needed, and that isn't available in NICU settings. His Franciscan medical team – including several Boston Children's Hospital physicians – were able to easily coordinate several procedures for my son at Boston Children's and implement a care plan that rehabilitated him to the point where were at last able to take him home.

The proposed investment will help Franciscan Children's increase its impact and reach even more families and more patients, clearly demonstrating the hospital's commitment to the health and well-being of children throughout Massachusetts. This project will ensure that patients and families have access to a full range of high quality, integrated pediatric care services.

I am confident Franciscan Children's investment in children, families and communities will have a long-lasting impact and benefit future generations of children for many years.

Thank you for accepting this letter of support.

Sincerely,

Erin Graham



Potential Prompts for Letter

DPH is most concerned about whether the project

- 1) has demonstrated it will add measurable public health value in terms of improved health outcomes and quality of life of the Patient Panel, while providing reasonable assurances of health equity;
- 2) will meaningfully contribute to the Commonwealth's goals for cost containment, improved public health outcomes, and delivery system transformation;
- 3) Has proposed plans for fulfilling responsibilities set out in the Department's Community-based Health Initiatives Guideline. For example, does the Community Engagement Plan and processes, Advisory Board make up and decision making structure, and Community Health Initiative Narrative reflect a strong approach to meeting community health needs beyond the four walls of the project?

As such, it would be particularly helpful to comment on:

- 1) The need for additional mental and behavioral health services in Massachusetts. The proposed project:
 - Increases the number of inpatient beds and inpatient capacity at FC
 - Renovates the FC CBAT
 - Creates additional beds for IDD/ASD patients
 - Co-locates two partial hospitalization programs (med-psych and IDD/ASD)
 - Enhances outpatient services including community-based programs
 - Creates a more robust education/training and research infrastructure across disciplines
- 2) The need for improved rehabilitative and post-acute care services especially for medically complex children. The proposed project:
 - Increases the number of medical beds for these children
 - Creates a single bedded environment with improved family supports (eg ability for parents to stay with their children)
 - Enhances associated services like additional capability to provide dental care for children with special health needs
- 3) The track record of FC and/or BCH in engaging in thoughtful community health planning and grant making efforts, including work to convene grantees to better support the work in the community.

As always examples from your own experience as a patient family, provider, community member, or advocate is very helpful context.



Determination of Need Program
MA Department of Public Health
250 Washington St.
Boston, MA 02108

October 30, 2023

Re: The Children's Medical Center Corporation/Franciscan Hospital – Hospital/Clinic Substantial Capital Expenditure

Dear Determination of Need Program,

I am writing to support the Children's Medical Center/Franciscan Children's Determination of Need application to revitalize its facility in Brighton. Franciscan Children's is a critical institution to the health care and educational landscape, serving children with complex medical, mental health, and educational needs from neighborhoods across Boston, the state, and the New England region.

Through the proposed project, Franciscan Children's will construct a state-of-the-art, family friendly facility to meet both the existing and growing needs of children who require behavioral health and rehabilitative care. In addition, Franciscan Children's will expand services to children who require dental surgery through expansion of its existing operating room capacity.

As the oldest child welfare advocacy organization in the state and a founding member of the Children's Mental Health Campaign (CMHC), MSPCC views this project as an important part of the solution to address long-standing challenges with access to behavioral health treatment for youth in the Commonwealth. In 2021, the American Academy of Pediatrics, the American Academy of Child and Adolescent Psychiatry, and the Children's Hospital Association declared a National State of Emergency in child and adolescent mental health. This well documented problem led the U.S. Surgeon General to issue an advisory on youth mental health, calling for urgent action to address this public health crisis. Yet, accessing behavioral health care continues to be a challenge for youth and families in Massachusetts. For youth of color, LGBTQ+ youth, and other historically underserved youth, the crisis is even more acute. By increasing inpatient psychiatric capacity, renovating its Community-Based Acute Treatment program, and creating partial hospital programs for psychiatric patients with medical complexity and Autism Spectrum Disorder (ASD), the project fills a void in the continuum of care.

When the CMHC released its seminal report on emergency department boarding in 2017, it found that youth with ASD/IDD are at risk for longer durations of boarding, and that the typical seasonal variability in psychiatric boarding for youth without ASD does not exist for youth with co-occurring ASD. The consistent demand throughout the year, suggests the need for dedicated capacity for youth with ASD.

In 2020, the CMHC released an update to its report on pediatric behavioral health urgent care, which further cited the dearth of services designed to meet the unique needs of youth with ASD in particular. This project creates much needed inpatient and partial-hospital capacity for youth with ASD, who require care environments that are sensory informed and staffed by providers and personnel trained in how to work with these youth.

The proposed investment will help Franciscan Children's increase its impact and reach even more families and more patients, clearly demonstrating the hospital's commitment to the health and well-being of children throughout Massachusetts. This project will ensure that patients and families have access to a full range of high quality, integrated pediatric care services.

I am confident Franciscan Children's investment in children, families and communities will have a long-lasting impact and benefit future generations of children for many years.

Thank you for accepting this letter of support.

Sincerely,

A handwritten signature in black ink, appearing to read 'Nancy Allen-Scannell', with a long, sweeping horizontal line extending to the right.

Nancy Allen-Scannell
Executive Director, MSPCC
Vice President for Public Affairs, Eliot Community Human Services
nscannell@mspcc.org



11 November 2023

Determination of Need (DON) Program
Massachusetts Department of Public Health (DPH)
250 Washington Street
Boston MA 02108

Electronic Transmission

Re: The Children's Medical Center Corporation/Franciscan Hospital – Hospital/Clinic Substantial Capital Expenditure

To Whom It May Concern at the Massachusetts DPH Determination of Need Program,

I am writing to support the Children's Medical Center/Franciscan Children's Determination of Need application to revitalize its facility in Brighton MA. The DON application is submitted to support the construction of a new 278,000 square foot, seven story clinical building on the Franciscan Children's campus. The plan to develop this new clinical care building is in direct response to the unmet needs for intensive behavioral health treatment of children, particularly those with complex conditions.

Franciscan Children's serves children with complex medical, mental health, and educational needs from neighborhoods across Boston, the Commonwealth, and the New England region. Franciscan Children's is a critical institution to meeting needs in a behavioral health care system that is challenged by too few beds, particularly specialty beds, that are effectively embedded in the larger behavioral health and health care system serving children and families.

Through the proposed project, Franciscan Children's will construct a state-of-the-art, family friendly facility to meet both the existing and growing needs of children who require behavioral health and rehabilitative care. In addition, Franciscan Children's will expand services to children who require dental surgery through expansion of its existing operating room capacity.

Formed over a century ago in 1913, the Massachusetts Association for Mental Health (MAMH) is dedicated to promoting mental health and well being, while preventing behavioral health conditions and associated disability. Child mental health is our highest priority, and we are committed to advancing prevention, early intervention, effective treatment, and research for children and their families. MAMH has a demonstrated track record of furthering its mission by convening stakeholders across the behavioral health and public health communities; disseminating emerging knowledge; and providing subject matter expertise to inform public policy, service delivery, and payment methodologies.

We are, therefore, highly engaged with Children's Hospital and Franciscan Children's Hospital as part of our efforts to we well informed not only about the needs of children and their families but also about cutting edge solutions for children with complex conditions, such as those treated at Franciscan's including children who also have complex developmental disabilities and physical health conditions.



As a partner to Children's Hospital in the Children's Mental Health Campaign, we collectively promote public awareness, deepen policymakers understanding, and work to support commitments to implement sufficient and innovative services to improve the timeliness and effectiveness of care for children with high needs. Children and adolescents have been particularly vulnerable to poor mental health outcomes stemming from the COVID-19 pandemic. Isolation, changes in routine, anxiety and uncertainty associated with the virus, financial and food insecurity, and parental stress can all negatively impact child mental health. This, as you know, puts our children and youth at risk for mental health, substance use, social and learning challenges that left unaddressed can create lifelong difficulties.

We applaud Franciscan Children's Hospital and Children's Hospital Boston for stepping up to commit substantial effort and resources to responds to the unmet needs of children with behavioral health conditions. While Franciscan Children's Hospital is already a unique and leading resource for children and families, current capacity is insufficient to meet demand today and the requirements for a state of the art physical plant for the future. The institution has always extended itself to serve those patients who were otherwise passed over by other health care institutions as have needs to great to meet. Franciscan's always rises to the challenge, welcoming children and their families regardless of complexity of need or ability to pay. The project requested will greatly benefit the families who depend uniquely upon Franciscan's and will serve as a hub of intensive care and robust support linked to the larger child health and behavioral health system.

In short, the proposed investment will help Franciscan Children's increase its impact and reach even more families and more patients. The extraordinary investment and effective leadership demonstrated in their proposal to strengthen and expand care to children with complex behavioral, developmental, and medical conditions clearly demonstrates the hospital's commitment to the health and well-being of children throughout Massachusetts. This project will ensure that patients and families have access to a full range of high quality, integrated pediatric care services.

MAMH is please to support and is confident that the proposed investment by Franciscan Children's will net great lasting gains for children, families and our communities. This initiative's impact will sustain for future generations of children,

Thank you for accepting this letter of support.

Sincerely,

Danna Mauch, PhD