

April 1, 2022

Via Email

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

Re: Tufts Medical Center, Inc. – Tufts Medical Center– Closure of Pediatric Intensive Care Unit Beds and Pediatric Medical Surgical Beds

Dear Mr. Davis:

This letter is submitted on behalf of Tufts Medical Center, Inc. (the “Medical Center”), which owns and operates Tufts Medical Center, located at 800 Washington St., Boston Massachusetts 02111, in follow-up to the initial essential services closure notice that the Medical Center filed on February 18, 2022 with the Department of Public Health (the “Department”) and the appropriate parties required by the Department’s regulations. Pursuant to 105 CMR 130.122(B), the Medical Center hereby provides the required ninety (90) day notice to the Department of the proposed closure of ten (10) licensed pediatric intensive care unit (“PICU”) beds and fifty-seven (57) licensed inpatient pediatric medical surgical (“Pediatric Unit”) beds. As you may be aware, due to the level of patient demand, the Pediatric Unit has operated at thirty-one (31) beds. Included in the closure are the Pediatric Unit bone marrow transplant (“BMT”) beds, which are a subset of the Pediatric Unit. In addition, when the Pediatric Unit closes, the Medical Center will no longer provide outpatient chemotherapy services to pediatric oncology patients. This active treatment component of the pediatric oncology service treats on average 35 patients annually and is inextricably related to the operation of Pediatric Unit. All services will remain open to new and existing patients throughout the closure process. During this period the Medical Center will actively work with patient families to facilitate each patient’s transition to the alternative providers that are available.

The PICU and Pediatric Unit (collectively, the “Service”), are underutilized at the Medical Center. In compliance with 105 CMR 130.122(B), the following information regarding the discontinuation is provided for the Department’s review.

1. Current Utilization Rates. The following table details the Service for the last three fiscal years (“FY”), including FY22 through February.



| PICU | FY19 | FY20 | FY21 | FY22 through February |
|--|-------------|-------------|-------------|------------------------------|
| Number of Cases | 676 | 536 | 683 | 368 |
| Patient Days | 2,070 | 1,532 | 1,998 | 792 |
| Average Daily Census | 6 | 4 | 5 | 5 |
| Pediatric Unit | FY19 | FY20 | FY21 | FY22 through February |
| Number of Cases | 2,103 | 1,859 | 2,289 | 1102 |
| Patient Days | 5,616 | 5,200 | 7,363 | 3262 |
| Average Daily Census | 15 | 14 | 20 | 21 |
| <p>As illustrated in the table above, the Average Daily Census (“ADC”) in the PICU ranges between 40-60% of available capacity and ADC in the Pediatric Unit ranges between 45-67% of available capacity. Utilization rates for FY21 and FY22 are impacted by the COVID-19 pandemic, which explains the increase in bed use. Additionally, these data include adult patients in the PICU and Pediatric Unit during FY20, FY 21, and FY22. During FY21 and FY22, 8% of utilization in the units was for adults, and in FY 20, 11% of utilization was for adults. Also note that a single admission may result in multiple Cases in the event that the patient occupies beds in multiple units during the course of the admission.</p> | | | | |

2. Impact of Discontinuance. The Medical Center understands the concern and inconvenience it creates for some patients and their families, however it does not anticipate significant impact. Comparable services are available at other hospitals, including but not limited to, Boston Children’s Hospital. Boston Children’s Hospital is located approximately 2.7 miles away from the Medical Center and is scheduled to open additional inpatient services in 2022. In recent years, the neighborhood in which the Medical Center is located, Chinatown in Boston, accounts for on average only 15 inpatient discharges per year.
3. Date Set of Discontinuance. This ninety (90) day notice is hereby provided for a target closure date of July 1, 2022.
4. Health Care Coalitions and Community Groups.
The following community groups may have an interest in the discontinuation of the Service:



Gavin Foundation,
675 E 4th St, South Boston, MA 02127

Josiah Quincy Elementary School,
885 Washington St, Boston, MA 02111

Chinese Progressive Association,
28 Ash St, Boston, MA 02111

Asian Community Development Corporation,
38 Oak St, Boston, MA 02111

Boston Chinatown Neighborhood Center,
38 Ash St, Boston, MA 02111

Boston Center for Youth and Families - Quincy School site.
885 Washington St, Boston, MA 02111

5. Community Engagement and Planning Activities. Tufts Medical Center conducted the following community engagement and planning activities with respect to the closure of the Service.

Communicated with representatives of the following coalitions and community groups regarding the inpatient closure: Gavin Foundation, Josiah Quincy Elementary School, Chinese Progressive Association, Asian Community Development Association, Boston Chinatown Neighborhood Center, Boston Center for Youth and Families - Quincy School site, South Boston Community Health Center, South Cove Community Health Center.

Tufts Medical Center sent direct communication to approximately 140 local community members and groups, including bilingual information.

On multiple occasions, Tufts Medical Center sent email notices to pediatric patients regarding the closure of the Service. The emails were sent to nearly 27,000 patient addresses.

Communicated with Sampan community newspaper.

Communicated with elected and appointed statewide leaders

Communicated with Boston elected officials including city council, state legislators and congressional delegation

Communicated with legislative officials representing area of MelroseWakefield Hospital

Communicated with legislative officials representing area of Lowell General Hospital

Met with staff from members of Massachusetts Congressional delegation

Tufts Medical Center established a dedicated phone line for questions related to the Service closure. Questions about the service closure can be directed to (866) 978-2399.



Thank you for your attention to this matter. If you have any questions, please contact Zachary Redmond, SVP and Deputy General Counsel at (617) 636-8058.

Sincerely,



Michael Tarnoff, M.D.
President and CEO, Tufts Medical Center

cc: E. Kelley, DPH
W. Mackie, Esq., DPH
R. Rodman, Esq., DPH
K. Fillo, DPH

Health Policy Commission
Office of the Attorney General (Massachusetts)
Center for Health Information and Analysis
Executive Office of Labor and Workforce Development

