



November 15, 2019

Via Email Only

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

Dear Mr. Davis:

This letter is submitted on behalf of Southcoast Health System, Inc., a not-for-profit, integrated health system and its licensed acute care hospital Southcoast Hospitals Group, Inc., which comprises three licensed campuses: Charlton Memorial Hospital in Fall River, St. Luke’s Hospital in New Bedford, and Tobey Hospital in Wareham (collectively, “Southcoast Health”).

In response to your letter dated November 1, 2019 and pursuant to 105 CMR 130.122(F), Southcoast Health hereby provides the elements of its plan, along with the additional information requested in the letter.

Information on utilization of the service prior to proposed discontinuance

The following represents the volume of deliveries at Tobey Hospital for each fiscal year since FY2014:

Year	# of Deliveries
FY2014	468
FY2015	427
FY2016	427
FY2017	399
FY2018	371
FY2019	375

The following represents the number of deliveries at Tobey Hospital in FY18 by city/town of patient origin:

City/Town	# of Deliveries	% of Total
Wareham	83	22.4%
New Bedford	53	14.3%
Middleboro	26	7.0%
Fairhaven	24	6.5%
Buzzards Bay	17	4.6%
Rochester	16	4.3%
Dartmouth	14	3.8%
Acushnet	11	3.0%
Plymouth	10	2.7%
Other Communities (<10 Deliveries)	117	31.5%
Total	371	100%

Information on the location & service capacity of alternative delivery sites

As part of Southcoast Health’s plan, expecting mothers and families will be contacted and referred and/or transferred to a facility of their choice that has the capacity to provide maternal and newborn care. Southcoast Health does not anticipate any adverse impact on the service area or access to care as a result of the planned changes, as there are a number of other hospitals in the area that provide similar services. It is anticipated that patients will primarily choose to deliver at the St. Luke’s Hospital Campus, which is less than 20 miles away from the Tobey Hospital Campus and offers a comprehensive set of services for mothers, newborn children, and families. Other area hospitals include the Charlton Memorial Hospital Campus in Fall River, MA, Beth Israel Deaconess Hospital - Plymouth in Plymouth, MA, Falmouth Hospital in Falmouth, MA, Cape Cod Hospital in Hyannis, MA, Brockton Hospital in Brockton, MA, Good Samaritan Medical Center in Brockton, MA, Sturdy Memorial Hospital in Attleboro, Newport Hospital in Newport, RI, and Woman & Infants Hospital in Providence, RI.

Hospital	City	State	Distance (Miles)	Births
St. Luke’s Hospital	New Bedford	MA	18.2	*1,449
BI Deaconess – Plymouth	Plymouth	MA	18.3	*771
Falmouth Hospital	Falmouth	MA	23.2	*408

CHARLTON MEMORIAL HOSPITAL
363 Highland Avenue, Fall River, MA 02720
508-679-3131

ST. LUKE’S HOSPITAL
101 Page Street, New Bedford, MA 02740
508-997-1515

TOBEY HOSPITAL
43 High Street, Wareham, MA 02571
508-295-0880

Charlton Memorial Hospital	Fall River	MA	28.6	*1,474
Cape Cod Hospital	Hyannis	MA	31	*797
Good Samaritan Med Ctr.	Brockton	MA	35	*1,064
Brockton Hospital	Brockton	MA	35	*1,006
Sturdy Memorial Hospital	Attleboro	MA	37.9	*704
South Shore Hospital	Weymouth	MA	41.8	*3,449
Women & Infants Hospital	Providence	RI	44.5	**9,344
Newport Hospital	Newport	RI	46.3	**450

*Massachusetts Data: Massachusetts Births 2016 (Published May 2018) *<https://www.mass.gov/lists/birth-data>

**Spotlight Analytics: FY16 Births

Travel Times to Alternative Delivery Sites

The following represents the distance and approximate travel times to alternative delivery sites:

Hospital	City	State	Distance (Miles/Minutes)
St. Luke's Hospital	New Bedford	MA	18.2 / 28
BI Deaconess – Plymouth	Plymouth	MA	18.3 / 35
Falmouth Hospital	Falmouth	MA	23.2 / 32
Charlton Memorial Hospital	Fall River	MA	28.6 / 35
Cape Cod Hospital	Hyannis	MA	31 / 46
Good Samaritan Med Ctr.	Brockton	MA	35 / 49
Brockton Hospital	Brockton	MA	35 / 49
Sturdy Memorial Hospital	Attleboro	MA	37.9 / 48
South Shore Hospital	Weymouth	MA	41.8 / 59
Women & Infants Hospital	Providence	RI	44.5 / 60
Newport Hospital	Newport	RI	46.3 / 60

Assessment of transportation needs post closure and plan for meeting those needs:

- a. If a pregnant woman arrives at the Emergency Department (ED) at Tobey Hospital for services after office hours or in active labor, they will undergo a medical screening exam by a trained provider. If assessed to be actively contracting, but not near delivery, the patient will be transported by ambulance to St. Luke's Hospital in New Bedford, MA or another local delivering hospital of their choice.
- b. If a pregnant woman arrives for services in the Tobey ED in active labor and assessed by a trained Emergency Provider to be near delivery, she will be delivered by trained ED Providers and Staff. After delivery, the patient and baby will be transported to St. Luke's Hospital via appropriate EMS transportation.

Protocol detailing mechanisms to maintain continuity of care for current patients of discontinued service:

- a. The offices of Triad OB/GYN located in Wareham, MA will remain open. Current patients can continue to be cared for by the medical providers and staff at this practice. All providers at this practice have privileges to perform deliveries at the St. Luke's Hospital in New Bedford, MA. In addition, Louise Bastarache, CNM will continue to see patients and has privileges to perform deliveries at St. Luke's Hospital.
- b. Southcoast Physicians Group (SPG) OB/GYN will continue to operate practices in New Bedford and patients have the option to transfer care to this group of providers.
- c. All three practices (Triad OB/GYN, Louise Bastarache CNM, and SPG OB/GYN) will provide antenatal, perinatal, and post-partum care.

Protocol describing how patients in the Hospital's service area will obtain services at alternative delivery sites:

As stated above, the OB/GYN practices of Triad OB/GYN, Louise Bastarache CNM, and SPG OB/GYN will continue to see patients in the Wareham and New Bedford areas.

If a pregnant woman arrives at the Emergency Department (ED) at Tobey Hospital for services they will undergo a medical screening exam by a trained Emergency Room provider. If the trained medical provider determines the patient to be actively contracting, but delivery is not imminent and there is adequate time for a safe transfer, the ED provider will initiate the interfacility transfer process. This process includes:

- Determining method and urgency of transfer based on patient condition, patient preference, and travel time to accepting facility.
- Discussing the plan with the patient, including explanation of rationale, risks and benefits and obtaining the patient's consent to treatment.
- Notifying the Southcoast Transfer Center to assist with the transfer process.
- Obtaining acceptance for transfer and care at the receiving facility.
- Completing a discharge summary report that includes demographic patient information, reason for transfer, patient status, name of accepting facility and provider, means of transport and level of emergency service personnel is accompanying the patient.
- Completing EMTALA paperwork.
- Communicating the plan to the entire patient care team.

Tobey Hospital has an agreement of first preference with Brewster Ambulance and has infrastructure in place to quickly move to an alternative emergency medical transport service in the event of a delay. The hospital has access to basic Life Support (BLS), Advanced Cardiac Life Support (ACLS), and Critical Care/ Med Flight. Southcoast has informed local and regional emergency service providers (CMED) of the proposed discontinuance.

If a pregnant woman arrives for services in the Tobey ED in active labor and assessed by a trained Emergency Room provider to be near delivery, she will be delivered by trained ED providers and staff. After delivery, the patient and baby will be transported to a hospital of the patient's choice, based on the level of care needed, via appropriate EMS transportation. If the newborn requires transfer to a tertiary center or NICU, the ED provider will work through the Transfer Center to notify the receiving hospital, so they can send a team to safely manage the transport process.

Training and Competency of Staff

At Southcoast we take the safety of our patients seriously. This is why we have developed a comprehensive plan to care for laboring Mothers who present to the Tobey ED

Prior to the unit discontinuance:

- Emergency providers and ED leadership will attend an off-site day-long simulation training conducted by University of Massachusetts Medical School, Worcester.
- Neonatal Resuscitation Program (NRP) classes will be completed by ED Registered Nurses.
- NRP classes and additional education will also be held on site and provided by clinical nurse experts in obstetrics, family centered care, and neonatal care, including emergency obstetric and neonatal care. This training will include a comprehensive review of neonatal and maternal care, including emergencies and use of equipment needed in the event of an emergent delivery. At the end of the training, participants will complete an evaluation to assess learning and future educational needs.

On-going:

- ED staff and leadership will be required to complete 4 computer based learning modules annually:
 - OB hemorrhage
 - Shoulder dystocia
 - Precipitous vaginal delivery
 - Immediate care of the Mother and Newborn after delivery
- ED Registered Nurses will attend one STABLE course annually. STABLE is the most widely used and distributed evidence-based program focused exclusively on post resuscitation/pre-transport stabilization care of infants.
- ED staff will also attend an annual Obstetrical skills training taught by clinical nurse experts in obstetrics, family centered care, and neonatal care, including emergency obstetric and neonatal care. This skills training will include competency assessment and validation via skills demonstration and test completion.
- Mock emergent delivery drills will be conducted which will include a competency assessment of the response team, timed response and actions, and debriefing to understand areas for improvement and to identify future learning needs.

Pre-Labor Evaluations

Triad OB/GYN will continue to see patients in Wareham and will continue to provide the same level of prenatal care they are currently providing. Louise Bastarache, CNM will also continue to see patients. Those patients who present to the Tobey Hospital ED will be assessed by trained ED personnel. If deemed obstetrical services are needed and it is safe to transport, patients will be transported by local EMS providers to a facility that provides obstetrical services. If delivery is imminent, the baby will be delivered in the Tobey Hospital ED and baby and Mother will be transported by local or regional EMS to a facility providing Obstetrical and post-partum services.

Transportation Needs of Populations Served

Transportation vouchers will be offered to patients and family members of patients, who would have delivered at Tobey Hospital, but now deliver at St. Luke's Hospital, post delivery.

Impact on Staff

There are 24 staff members, 22 part time and 2 per diem (14.1 FTEs) affected by the service change. Several staff have already secured full time or part time employment. The remaining staff will have the opportunity to bump into a position they are qualified for at Tobey hospital, select an open position within Southcoast or select a position with equivalent control hours at St. Luke or Charlton Memorial Hospital.

Associated Community Services

Southcoast Health, in collaboration with the community providers and Southcoast employed resources will continue to provide ambulatory office-based services and educational

opportunities for expectant mothers as well as new mothers. Triad OB/GYN, a private practice group in the Wareham Community, employs 3 physicians, a nurse practitioner and a licensed midwife to provide comprehensive women's care including prenatal care, fetal monitoring, and post-partum services. Triad will continue to provide OB deliveries for their patient panel but will move their delivery location from Tobey Hospital to St. Luke's Hospital on January 1, 2020. Triad has already notified existing and new patients of this change in deliver location. Similarly, Louise Bastarache, CNM intends to move her delivery location from Tobey Hospital to St. Luke's Hospital on 1/1/20 and has notified her patients accordingly.

Southcoast Health will continue to offer expectant parents educational resources in Wareham. Childbirth educators and certified lactation counsellors will teach Prepared Childbirth, Birthing Bootcamp, Breastfeeding Basics, and Breastfeeding Support Group at Tobey Hospital and the Rosebrook office building. The Prepared Childbirth Series will cover the changes occurring in the third trimester, processes of labor and birth, comfort measures and labor support. Instruction on infant care and car seat safety are included. The series will be offered every other month in the Stillman Library at Tobey Hospital. The Birthing Boot Camp is a condensed version of the Prepared Childbirth Series. It is all-day class that covers labor and birth as well as infant care and car-seat safety. It will be offered on alternating months on Saturdays in the Stillman Library at Tobey Hospital. Breastfeeding Basics will be offered to families that are planning to breastfeed or are exploring their options regarding infant feeding choices. Topics include the benefits of breastfeeding, techniques and positions. This class is intended for expectant families and will meets every other month in the Stillman Library at Tobey Hospital. Breastfeeding Support will continue to meet on the first and third Fridays of every month at the Rosebrook Office Building in Wareham. Mothers and their babies are welcomed to attend drop-in sessions to learn more about breastfeeding. Peer support and one-on-one help from specially trained health professionals is available, including professional lactation support. The childbirth education resources offered in Wareham will be supported by registered nurses employed by Southcoast Health. Public transportation (gatra.org) via the Wareham/Onset Link (OWL) is available to the residents of Onset, Wareham, Bourne, and Buzzards Bay.

Cultural and Linguistic Needs of Populations Served

Data collected from patients who self-attested to their race and ethnicity found in FY15, 85 percent of patients treated at Southcoast hospitals identified as Caucasian, 6 percent identified as Hispanic, and 4 percent identified as Black or African-American. In FY16, 82 percent identified as Caucasian, 7 percent identified as Hispanic, and 5 percent identified as Black or African American. In FY17, 82 percent identified as Caucasian, 8 percent identified as Hispanic, and 5 percent identified as Black or African-American. It is important to note that patients are grouped in these categories based upon how they self-attested. Each year, between 3 and 5 percent of the patient population either declined to identify or identified as other/not specified or unknown.¹ As such, it is important to note that the racial composition of Southcoast's patient panel may be understated. While we find that the majority of our patients, presenting at the Tobey Hospital, speak English as their primary language, Southcoast Health employs certified interpreters who

¹ Patients were grouped into the following categories based upon their responses: White or Caucasian, Hispanic, Black or African America, Other/Not Specified, Unknown, Asian, Patient Refused, American Indian or Alaska Native, or Native Hawaiian or Other Pacific Islander.

are available 24/7 and are further supported by vendors who provide video and telephone conferencing capabilities. These services are available across the health system, including Tobey Hospital and St. Luke's Hospital (alternate delivery site) and will continue to be available for any/all patients that would present to either facilities and for any level of service.

Thank you for your attention to this matter. If you have any questions, or require any additional information, please do not hesitate to contact me.

Sincerely,



Renee Clark
Executive Vice President & Chief Operating Officer
Southcoast Health

Cc: E. Kelley, MBA, MPH, DPH
S. Lohnes, Esq., DPH
W. Mackie, Esq., DPH
R. Rodman, Esq., DPH