

American Academy of Pediatrics

DEDICATED TO THE HEALTH OF ALL CHILDREN™



The Massachusetts Chapter

May 20, 2013

[Cheryl Bartlett](#)
[Acting Commissioner](#)
[Department of Public Health](#)
[250 Washington Street](#)
[Boston, MA 02108](#)

[Dear Commissioner Bartlett,](#)
[To Whom it May Concern:](#)

The Massachusetts Chapter of the American Academy of Pediatrics (MCAAP) represents over 1,800 pediatricians from across the Commonwealth. Our members work in diverse settings, from solo practices in small towns with small community hospitals to large multi-specialty groups in huge tertiary academic medical centers. Despite the demographic diversity of our members, we are all committed to the attainment of optimal physical, mental and social health for all infants, children, adolescents, and young adults across the state.

Healthcare is changing rapidly in our current era of healthcare payment reform, [creation of](#) large healthcare delivery systems, and the movement towards population-based medicine and Accountable Care Organizations (ACOs). As our medical system evolves ~~rapidly~~, it is important that we continue to ensure that the infants, children, adolescents, and young adults across the Commonwealth continue to have access to timely, high quality, inpatient hospital care.

Recently, there have been some well-publicized highly controversial closings of pediatric wards in community hospitals, [and now there is a proposal to close the pediatric ward at Morton Hospital in Taunton](#). The decision to close these hospital wards seems to be driven primarily by cost concerns. The MCAAP believes that ~~the any~~ decision to close the pediatric ward of a community hospital involves complex issues [and ought to take into consideration](#); ~~including~~ timely access to quality care in the communities where our patients live, and the burdens placed on patients and families by requiring travel to distant tertiary centers. The decision to close a pediatric ward should not be made based on bottom-line economic considerations alone.

We are concerned that community pediatrics is [disappearing](#). If this trajectory continues, timely access to Pediatric care is in jeopardy. [It is the role of DPH through its hospital licensure authority to ensure community access to all vital hospital services, even if it may be financially unproductive](#). It is imperative that the DPH develop metrics for determining how many pediatric beds are necessary in a community, and use ~~thoese~~ metrics to guide decisions on bed closure. Until such measures are in place, the MCAAP [believes would urge that no -that](#) no further closure of pediatric beds be permitted.

Comment [E1]: Do you mean community pediatrics (pediatrician offices) or hospital services?

Executive Director

Cathleen Haggerty
860 Winter Street
Waltham, MA 02454
781-895-9852
Fax 781-895-9855
chaggerty@mcaap.org

Immediate Past President

Gregory Hagan, M.D., FAAP
Cambridge, MA
617-665-3600
gnhagan@challiance.org

President

John O'Reilly, M.D., FAAP
Springfield, MA
413-794-7448
joreilly@mcaap.org

Vice President

Michael McManus, M.D., FAAP
Boston, MA
617-355-6000
mmcmanus@mcaap.org

Treasurer

Dmitry Dukhovny, M.D., FAAP
Boston, MA
617-355-6000
ddukhovny@mcaap.org

Secretary

Kathryn Brigham, M.D., FAAP
Boston, MA
617-355-6000
kbrigham@mcaap.org

District Representatives

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Fernando Catalina, M.D., FAAP

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The DPH is the regulatory agency responsible for ensuring that the health and well-being of the pediatric age patients is maintained despite economic pressures to close pediatric wards in community hospitals. The MCAAP and our partners in the national AAP are willing to work with DPH to ensure that decisions around hospital ward closings are done in a fair and deliberate manner, taking into consideration the many complex public health and economic implications involved. I believe that both our organizations strive to improve the health and well-being of the citizens of the Commonwealth, and this shared common goal will should allow us to work together to achieve timely quality care for all pediatric patients across this great state.

Sincerely,

A handwritten signature in cursive script, appearing to read "John O'Reilly".

John O'Reilly
President, the Massachusetts Chapter of the American Academy of Pediatrics