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5. Standards: NICU
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Edward B. Goldman, J.D., Chairperson
Certificate of Need Commission
Michigan Department of Community Health
Lansing, Michigan

Dear Mr. Goldman:

Trinity Health would like to request a thorough review of the NICU CON review standards, to include the establishment of a Standard Advisory Committee (SAC). As part of the continued post-merger clinical consolidations at Mercy Health Partners in Muskegon, there is a pending consolidation of the Mercy/Hackley birth centers. The consolidated program, located on the Mercy Health Partners Hackley campus, will be one of only two hospitals in the state with over 2,500 births and no NICU. Neonatology has been identified as one of the services with the most out-migration in an analysis of Muskegon County.

The threshold to initiate a NICU is currently 2,000 live births - which will be easily met by the consolidated obstetrical program. However, the current bed need formula suggests that there is not an unmet need in the planning area.

The care of critically ill newborns has changed significantly over the years and is now very family-centered where the maximum involvement with parents is highly encouraged. Most NICU staffs encourage parents and grandparents to be involved in each step of their baby's care with 24-hour access in most cases.

It is clear that there is an access problem for residents in Muskegon County and surrounding areas. Access to NICU services only in Grand Rapids restricts the ability of families to be part of the care team for their ill newborns.

Thank you for your consideration,

Mary Boyd
Vice President, Regional Network and System Development
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