

February 20, 2020

Via Email and FedEx

Sherman Lohnes, Esq.
Division of Health Care Facility Licensure and Certification
Department of Public Health
67 Forest Street
Marlborough, MA 01752



Re: VHS Acquisition Subsidiary Number 9, Inc. (d/b/a MetroWest Medical Center) – Formal 90-Day Notice of Closure of Medical/Surgical Service, Intensive Care Unit, Emergency Department, Operating Rooms, and Outpatient Rehab at Leonard Morse Campus

Dear Mr. Lohnes:

This letter is submitted on behalf of VHS Acquisition Subsidiary Number 9, Inc., d/b/a MetroWest Medical Center (the “Medical Center”). Pursuant to 105 CMR 130.122(B), the Hospital hereby provides ninety (90) day notice to the Department of Public Health (“Department”) of its decision to discontinue its operation of all medical hospital services at its Leonard Morse Campus located at 67 Union Street, Natick, MA 01760 (“LMC”). These services include a 64-bed Medical-Surgical unit, 10-bed Intensive Care Unit, all Operating Rooms, its Emergency service, and its Outpatient Rehabilitation Service, collectively referred to as the “Services.” As a result, only LMC’s inpatient Psychiatric Service, its Sleep Lab Service, outpatient laboratory phlebotomy, electroconvulsive therapy and its CT Service will remain open. We offer the following comments with respect to this matter.

The Medical Center has determined that the Services should be discontinued because of insufficient patient volume, which is an indicator that the services are not needed and redundant in light of other alternative sites providing similar services. In compliance with applicable requirements at 105 CMR 130.122(B), the Medical Center provides this written notice of the planned discontinuance of the above described services. The following information regarding the discontinuation is hereby provided for your review:

1. Current Utilization Rates. The following represents the patient volume of the Services at the Medical Center over the last several years. Each of the Services has experienced a declining volume trend over this time period.



Since 2015, LMC has experienced a significant drop in emergency department volume. During this time period, emergency department visits dropped twenty-four (24%) or almost one quarter (1/4) of its volume.

LMH	2015	2016	2017	2018	2019	Trend
Emergency Department	14,087	13,115	12,065	11,454	10,778	Declining volume

The declining emergency visit trend correlates with a sharp decline in the other acute care services. For example, the Average Daily Census (“ADC”) for LMC’s medical/surgical unit dropped from 19.3 patients in 2016 to 13.6 patients in 2019, which represents an almost thirty percent (30%) drop in ADC, or about one third (1/3) in admissions to the unit on an ADC basis. The decline in ADC volume in the intensive care unit (“ICU”) was even more significant during the same time period, dropping over thirty-six percent (36%).

	2016	2017	2018	2019	Trend
Med Surg Unit ADC	19.3	16	15.2	13.6	Declining Volume
ICU ADC	4.4	3.8	3.3	2.8	Declining Volume

Both inpatient and outpatient surgery services had a similar decline in volume. Since 2016, inpatient surgeries dropped twelve (12%) percent. Outpatient surgeries dropped almost six percent (6%). Accordingly, the average decline in total surgeries at LMC dropped 8.5% percent from 2016 through 2019. In other words, almost one out of ten patients is no longer obtaining surgery at LMC.

	2016	2017	2018	2019	Trend
IP Surgery Cases	625	561	526	552	Declining Volume
OP Surgery Cases	2,064	2,106	1,961	1,947	Declining Volume
Total Surgery	2,689	2,667	2,487	2,459	Declining Volume

LMC’s outpatient rehabilitation services have also been impacted by changes in patient volume. Since 2016, there has been an over fifteen percent (15%) drop in patient utilization of LMC’s Physical Therapy Service. Over the same period, the volume of Occupational Therapy declined by almost ten percent (10%). In both cases, and like the other Services being closed, volume dropped year after year. Accordingly, total outpatient rehabilitation utilization dropped eleven percent (11%) since 2016. This significant and consistent decline in outpatient rehabilitation volume in the last few years is evidence that patients are not choosing LMC for these services in greater numbers.



		2016	2017	2018	2019	Trend
Physical Therapy		652	723	564	551	Declining Volume
Occupational Therapy		1,896	1,865	1,722	1,718	Declining Volume
Total Rehab		2,548	2,588	2,286	2,269	Declining Volume

2. Impact of Discontinuance. The Medical Center does not expect a significant impact, if any, on patient access following the closure of these Services. Its Framingham Union Hospital campus is capable of taking on any and all additional volume that may result from the closing of the Services at LMC. In addition, it is geographically close to LMC and its patient community, as it is under six (6) miles away and is near main roads, such as Route 9 and Route 135, both of which run through Natick. There are other health care providers which offer these Services within the same geographic area, as well. For example, the following is a list of alternative hospital sites where patients may obtain ED and Surgical care:

- MWMC Framingham Union Hospital (5.7 Miles) – 147 Beds; 45,000 ED Visits
- Beth Israel-Deaconess Needham (6.1 Miles) – 58 beds; 19 bays
- Newton-Wellesley Hospital (7.5 Miles) – a 286 beds; 60,000 ED Visits in 36 bays

There are also numerous urgent care sites in the Town of Natick and City of Framingham which can serve as a substitute for the ED setting at LMC where appropriate. Likewise, Physical Therapy and Occupational Therapy is offered in other settings operated by the Medical Center that are geographically close and accessible to the patient community, and that offer similar outpatient rehab services. These sites include:

- MWMC Framingham Union Hospital (5.7 Miles)
- MWMC Wellness Center (6.5 Miles)

3. Date Set of Discontinuation. Ninety (90) day notice is hereby given for a target closure date of May 20, 2020.

4. Health Care Coalitions and Community Groups. The Hospital anticipates that the following community group may have an interest in the discontinuation of the Services:

- MetroWest Health Foundation - 161 Worcester Rd #202, Framingham, MA 01701, 508-879-7625 (Contact: Martin Cohen)

5. Community Engagement and Planning Activities Prior to the Notice of Closure. The Hospital has undertaken the following community engagement and planning activities:



- January 20, 2020 – Conference call with CEO and officials from local health care and community organizations concerning the rationale for changes, timeline, community resources, and plan for Framingham Union Hospital. Participants included MetroWest Chamber of Commerce, Framingham State University, MassBay Community College, New England Quality Care Alliance (NEQCA), Tenet Physician Resources (TPR), Charles River Medical Associates (CRMA), Reliant Medical Group, Brewster Ambulance Service, Fallon Ambulance Service, and MetroWest Health Foundation.
- January 21, 2020 – Notice of closures provided to the Medical Center’s governing board, medical staff, Massachusetts Nurses Association, Local 877 Union, IBEW 109 Union, Massachusetts Senators and Representatives for Natick and Framingham, local officials of Natick and Framingham, PFAC, and EMS providers from Natick, Framingham, Ashland, Holliston, Hopkinton, Marlborough, Millis, Sudbury, and Wayland, as well as Brewster Ambulance Service, Fallon Ambulance Service, and Lifeline Ambulance Service.
- January 21, 2020 – Employees were notified of the closures through open forums held by the Medical Center.
- January 21, 2020 – Meeting with CEO and EMS providers concerning the rationale for changes, timeline, community resources, and plan for Framingham Union Hospital.
- January 27, 2020 – Conference call with CEO and YMCA concerning the rationale for changes, timeline, community resources, and plan for Framingham Union Hospital.
- January 29, 2020 – Meeting with CEO and Latino Health Insurance Program concerning the rationale for changes, timeline, community resources, and plan for Framingham Union Hospital.
- February 4, 2020 – Local health providers were notified of the proposed closures by mail:

Food Pantries

- A Place to Turn
- Natick Service Council, Inc.
- Daniels Table Food Pantry
- The Salvation Army Framingham Corps Community Center



Health Centers

- AFC Urgent Care
- Eliot Center for Health & Rehabilitation
- Natick Urgent Care

Behavioral Health Centers

- DCS Mental Health, Inc.
- The TRAINOR Center

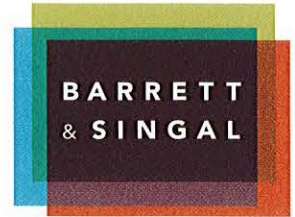
Senior Centers

- Natick Community-Senior Center
- Framingham Callahan Center

Veterans Services

- Natick Town Veterans Services
 - AMVETS Post 79
 - Veterans of Foreign Wars
 - Framingham Veterans Services
 - VA Framingham Clinic
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- February 5, 2020 – Office meeting between Medical Center officials and Hon. David Linsky (Rep.) and Hon. Rebecca Rausch (Sen.) concerning rationale for changes, timeline, community resources, plans for affected employees and plan for Framingham Union Hospital.
 - January 20, 2020 through January 30, 2020 – Held numerous open forums with various stakeholders to discuss rationale for changes, timeline, community resources, plans for affected employees and plan for Framingham Union Hospital, including:
 - Hospital Directors and Trustees
 - Medical Staff Leadership
 - Hospital Managers
 - Leonard Morse Campus Employees and Perioperative Staff
 - Framingham Union Hospital Employees
 - Wellness Center Employees
 - Board of Trustees

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- Communicated with local television news stations and newspapers concerning announcement of closures at Leonard Morse Campus.

If you require further information with respect to this matter, please do not hesitate to contact me.
Thank you.

Sincerely,

A handwritten signature in blue ink, appearing to read "ASL", is written over the word "Sincerely,".

Andrew S. Levine

cc: A. Harding, MWMC
K. Haynes, Esq., DPH
A. Nardone, DPH
W. Mackie, DPH
T. Williams, Esq., MWMC

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

MetroWest Health Foundation