



August 3, 2020

Via Email

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

Re: Steward Carney Hospital, Inc. – Formal 90-Day Essential Service Notice –  
Closure of Satellite Emergency Facility

Dear Attorney Lohnes:

On behalf of Steward Carney Hospital, Inc. (the “Hospital”) and 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 operation of its Satellite Emergency Facility in Quincy, MA (the “SEF”). This letter is in follow-up to the required initial notices that were filed with the appropriate parties on July 3, 2020. We offer the following comments with respect to this matter.

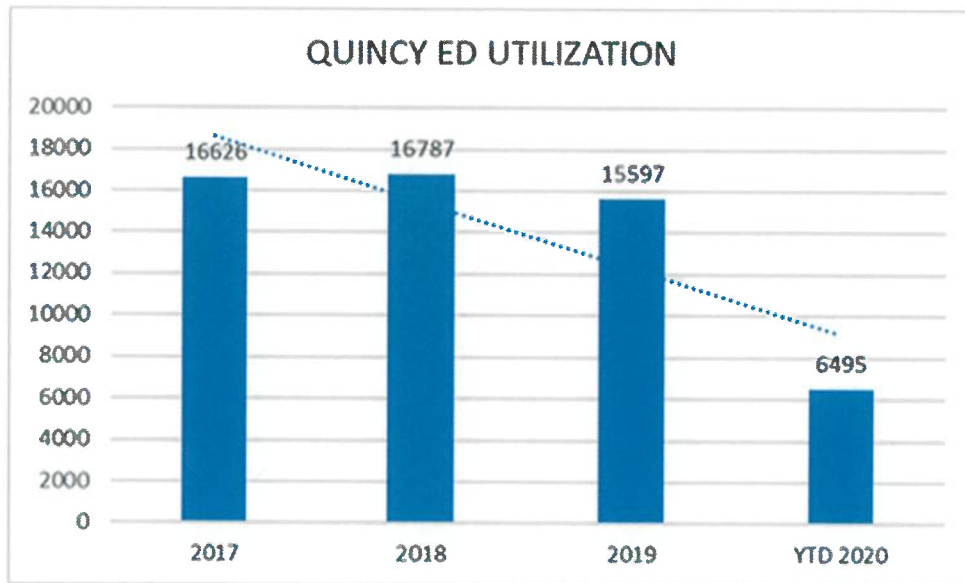
The Hospital opened the SEF in 2014 within the emergency department of the former Quincy Medical Center (“QMC”) at the time of QMC’s closure and has continued to operate the facility beyond the timing originally mandated in an agreement with the Attorney General’s Office. However, due to a variety of factors, the Hospital has determined that it will discontinue operating the SEF. The owner of the real estate exercised an early termination clause of the Hospital’s lease within the building where the SEF is located, which will now expire in December of this year. While the Hospital was disappointed to learn of this decision, the Hospital recognizes that the SEF has been underutilized by the patient population over the past several years. The SEF is located in an area where there are numerous alternative providers that offer similar services, including hospitals and urgent care centers. In the last year, a significant proportion of the SEF’s volume consists of patients presenting with lower acuity medical conditions rather than emergency needs. These patients can be better served in urgent care settings that are specifically designed to accept and treat such cases and which offer convenient walk-in hours and low wait times. In light of these circumstances, the Hospital determined that it will proceed to close the SEF.

In compliance with applicable requirements at 105 CMR 130.122(B), the Hospital provides this written notice of the planned discontinuance of the Services. The following information regarding the discontinuation is hereby provided for your review.

**1. Current and historical utilization rates (volume) for each of the Services (YTD and last 3 years).**

The SEF’s utilization data for the past several years demonstrates that the facility has experienced both underutilization and declining volume.

2017	2018	2019	YTD (through July 9, 2020)
16,626	16,787	15,597	6,495



Since 2017, the SEF has taken in less than 20,000 visits. By the end of 2019, annual visits had dropped over six percent (6%) to under 16,000 visits. The downward trend has continued into YTD 2020 (about 6.5 months), with only 1,000 average monthly visits. By comparison average monthly visits to the SEF across 2017, 2018, and 2019 ranged from approximately 1,300 visits to 1,400 visits. The drop in average monthly visits from 2017 through YTD ranges from a minimum of approximately twenty-three percent (23%) to approximately twenty-nine percent (29%). Consequently, at the current 2020 rate of utilization, the Hospital expects that the SEF would treat an annualized 12,990 visits, which would fall below

prior year 2019 visits by approximately 2,600 visits, i.e. by twenty percent (20%), and which would correspond to a twenty-two percent (22%) drop in visit performance since 2017.

The SEF's 2019 utilization data also shows that a large percentage of patients who present to the SEF for care have lower acuity conditions, which are better suited for urgent care settings.

<b>ESI</b>	<b>YTD Reg Dec-2019</b>	<b>% of total visits</b>
-	58	0.4%
<b>1</b>	136	0.9%
<b>2</b>	2,685	17.2%
<b>3</b>	7,508	48.1%
<b>4</b>	4,707	30.1%
<b>5</b>	530	3.4%
	<b>15,624</b>	<b>100%</b>

Patients having a higher acuity with an ESI of 2 or less totaled 2,879, or less than 20% of all visits to the SEF (18.5%). By contrast, patients having lower acuity with an ESI of 3 or more totaled 12,745, or 81.6% of all visits to the SEF.

**2. A description of the anticipated impact on individuals in the Hospital's service area following the closure of the Services.**

The Hospital does not anticipate that closing the SEF will have a negative impact on patients in the service area. The low and declining utilization of the SEF demonstrates that patients are not choosing to use the SEF for their emergency medical needs and are doing so in lesser numbers. Therefore, closing the SEF will not have an adverse effect on the patient community's access to care. Instead, patients will continue to have access to numerous other providers offering similar services. These providers operate within a short distance from the SEF and include the following:

- Carney Hospital Emergency Department – 3.9 Miles
- Beth Israel Deaconess Hospital-Milton Emergency Department – 3.9 Miles
- South Shore Hospital Emergency Department – 7.6 Miles
- Manet Community Health Center – 2.5 Miles
- South Cove Community Health Center – 2.4 Miles
- At least six (6) Urgent Care Centers located within in Quincy or Braintree

**3. Date for the closure of the Services.**

- November 1, 2020 at 7:00 a.m.

**4. Names and addresses of any organized health care coalitions and community groups known to the Hospital when the notice is issued to DPH that would have an interest in the closure of the Services.**

- Manet Community Health Center, 110 W Squantum Street, Quincy, MA 02171 (Cynthia Sierra)
- South Cove Community Health Center, 435 Hancock Street, Quincy, MA 02171 (Eugene Welch)
- Quincy Asian Resources, 1509 Hancock Street, Quincy, MA 02169 (Philip Chong)
- Brewster Ambulance Services, 639 Hancock Street, Quincy, MA 02170 (Mark Brewster)
- YMCA, 79 Coddington Street, Quincy, MA 02169 (Patrick Murphy)
- Health Express, 119 Parkingway, Quincy MA 02169
- Compass Medical Center, 54 Miller Street, Quincy, MA 02169 (Jamie Barber)
- Convenient Medical, 479 Washington Street, Quincy, MA 02169 (Andrea Bell)
- AFC Urgent Care Braintree, 485 Granite Street, Braintree, MA 02184 (Dr. Phyllis Fine)
- Minute Clinic, 626 Southern Artery, Quincy, MA 02169
- Atrius Health, 1250 Hancock Street, Quincy, MA 02169 (Dr. Steven Strongwater)

**5. A detailed account of any community engagement and planning which has occurred prior to filing notice of the closure of the Services.**

The Hospital has undertaken community engagement and planning since beginning this closure process. Such engagement includes sponsorship of community health education groups; for example, events held by Quincy Asian Resources. To enhance awareness of the availability of emergency services, it has also been marketing its Emergency Department to the patient community through local newspaper and billboard advertisements. In addition, the Hospital has conducted outreach activities with Manet Community Health Care and undertaken care coordination with Brewster Ambulance and skilled nursing facilities (SNFs) in the area. The Hospital has also begun a program of recruitment of Primary Care Providers

Sherman Lohnes, Esq., Director  
Division of Health Care Facility Licensure and Certification  
Massachusetts Department of Public Health  
August 3, 2020  
Page 5

(PCPs) to increase primary care access in the patient service area/market, and continues to engage with local elected officials.

Thank you for your attention to this matter. If you have any questions, please contact Andrew Levine, Esq., Barrett & Singal, P.C. at 617-598-6700 (alevine@barrettsingal.com).

Sincerely,



Tom Sands, MBA, MHA, FACHE  
President  
Steward Carney Hospital, Inc.

cc: N. Hibble, Esq., Steward  
W. Mackie, DPH  
A. Nardone, DPH  
J. Pierro, Steward  
J. Polanowicz, Steward  
R. Rodman, Esq., DPH

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

Manet Community Health Center  
South Cove Community Health Center  
Quincy Asian Resources  
Brewster Ambulance Services  
YMCA  
Health Express  
Compass Medical Center  
Convenient Medical  
AFC Urgent Care Braintree  
Minute Clinic  
Atrius Health