

August 28, 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: VHS Acquisition Subsidiary Number 9, Inc. (d/b/a MetroWest Medical Center) – Formal 90-Day Notice of Closure of Inpatient Pediatric Service at Framingham Union Campus

Dear Attorney Lohnes:

We write on behalf of VHS Acquisition Subsidiary Number 9, Inc., d/b/a MetroWest Medical Center (the “Medical Center”) in follow-up to the initial essential services closure notice that the Medical Center filed with the Department of Public Health (the “Department”) and the appropriate parties required by the Department’s regulations on July 29, 2020. Pursuant to 105 CMR 130.122(B), the Medical Center hereby provides formal ninety (90) day notice to the Department of its decision to discontinue its operation of inpatient pediatric services, consisting of 21 beds, (“the Service”) at the Medical Center’s, Framingham Union Campus located at 115 Lincoln Street, Framingham, MA 01702. We offer the following comments with respect to this matter.

Over the course of the last year, the Medical Center determined that the Service should be discontinued because of insufficient patient volume, which is an indicator that the patient population does not need the Service at the Medical Center. 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 Service. The following information regarding the discontinuation is hereby provided for your review.

1. Current Utilization Rates. The following represents the inpatient volume of the Service at the Medical Center over the last several years, including year-to-date (YTD).

FUH Pedi	2016	2017	2018	2019	Jan-Jun 2020	Trend
Pedi Unit Average Daily Census	1.9	1.4	1.1	1.1	0.6	Declining Volume

The Medical Center’s inpatient pediatric unit has experienced a continued decline to less than one-third of the already low census in 2016. In 2020 year-to-date, more than half of the days



experienced zero pediatric inpatients at the Medical Center. This significantly low Average Daily Census and continued decline year over year is evidence that there is insufficient demand for the Service at the Medical Center.

2. Impact of Discontinuance. The Medical Center does not expect any negative impact on patient access following the closure of this Service. Pediatric coverage will still be provided in the emergency department, post-partum units, and outpatient clinic to meet the community need. Moreover, most of the pediatric patients presenting to the Medical Center that require an inpatient hospital stay involve severe illness warranting specialized care provided at a tertiary care facility.

3. Date Set of Discontinuation. Ninety (90) day notice is hereby given for a target closure date of November 27, 2020.

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

- 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 Medical Center has undertaken the following community engagement and planning activities:

- July 29, 2020 – Email notice of closure provided to the Medical Center’s governing board, medical staff, employees, Massachusetts Nurses Association (MNA), Local 877 Union, IBEW 103 Union, Service Employees International Union (SEIU), Massachusetts Senators and Representatives for Natick and Framingham, local officials of Natick and Framingham, and the Patient Family Advisory Committee (PFAC).
- July 29, 2020 – Communicated with local newspapers concerning announcement of closure of Inpatient Pediatric Services, including MetroWest Daily News, Framingham Source, and Massachusetts Patch.
- July 28, 2020 through August 25, 2020 – The Medical Center held numerous conference calls and open forums with various stakeholders to discuss rationale for changes, timeline, community resources, plans for affected employees, and plan for the Medical Center’s Framingham Union Campus, including:
  - Medical Staff Leadership
  - Hospital Directors
  - Hospital Managers
  - Framingham Union Hospital Employees and Pediatric Unit Staff
  - Leonard Morse Campus Employees

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- Wellness Center Employees
- Board of Trustees
  
- July 29, 2020 through August 19, 2020 – Conference Calls between Medical Center CEO and leaders of 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, Mass Bay 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, MetroWest Health Foundation, Framingham YMCA, Latino Health Insurance Program, Kennedy Community Health Center, and Brazilian American Center.
  
- July 31, 2020 – Conference Call between Medical Center CEO and officials from the City of Framingham concerning the rationale for changes, timeline, community resources, and plan for Framingham Union Hospital. Participants included Mayor Yvonne Spicer, Representative Maria Robinson, Representative Carmine Gentile, Representative Jack Lewis, and other city leaders.

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

Sincerely,

A handwritten signature in black ink, appearing to read "ASL", is positioned above the name Andrew S. Levine.

Andrew S. Levine

cc: S. Davis, DPH  
E. Gold, Esq., OAG  
A. Harding, MWMC  
W. Mackie, DPH  
A. Nardone, DPH  
R. Rodman, Esq., 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