

HUSCH BLACKWELL

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June 26, 2023

VIA EMAIL

Stephen Davis, Director
Division of Health Care Facility Licensure and Certification
Bureau of Health Care Safety and Quality
Department of Public Health
67 Forest Street
Marlborough, MA 01752

Re: UMass Memorial HealthAlliance-Clinton Hospital – 90 Day Notice of Closure of
Maternity Inpatient Services

Dear Mr. Davis:

We write on behalf of UMass Memorial HealthAlliance-Clinton Hospital's Leominster Campus, located at 60 Hospital Road, Leominster, MA 01453, (the "Hospital"). 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 its Level I maternity service comprised of nineteen (19) licensed antepartum, labor and delivery, and postpartum beds, twenty-one (21) well-infant nursery beds and an operating room (the "Services"). This letter is in follow-up to the required initial notices that were filed with the appropriate parties on May 26, 2023. We offer the following comments with respect to this matter.

Like other health care organizations in the state, we are carefully examining how we deliver care to the patients and communities we serve, as well as determining how to best allocate our resources to support high-risk patients across the region. Maternity care is highly specialized and requires continuous and consistent coverage. In light of the existing labor shortages, the hospital has ongoing challenges in staffing the Services, including nurses and surgical technicians, as well as a developing shortage of physicians. In addition, for a number of years, the volume of deliveries has decreased. Given the above, the Hospital has determined that the Services should be closed.

The closure of the Services will not leave patients without alternative inpatient maternity service providers. To our knowledge, UMass Memorial Medical Center, St. Vincent Hospital, Henry Heywood Hospital and Emerson Hospital, appear to have the capacity to serve these patients.

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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 the Service (Fiscal Year YTD and last 6 Fiscal Years).

FY=October 1-September 30	2023 FY YTD March	FY2022	FY2021	FY2020	FY2019	FY2018	FY2017
<i>Total Births at Hospital</i>	230	511	572	557	564	634	762
<i>Avg. births per day</i>	1.3	1.4	1.6	1.5	1.5	1.7	2.0

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

Pregnant patients have the benefit of numerous other choices of hospitals for inpatient obstetrics care including deliveries. Obstetric/Maternity services are available at Emerson Hospital, UMass Memorial Medical Center, St. Vincent Hospital and Henry Heywood Hospital.

The Hospital does not currently offer ambulatory pre-natal and post-natal care and therefore is not closing this type of service. It is anticipated that most expectant patients will continue to see their care giver in their current community setting but will deliver in one of the other hospitals in the service area. Once the maternity service is closed, the Hospital will continue to provide emergent and walk in care and follow existing protocols to guide the transfer of patients requiring services not routinely offered at the Hospital. The Hospital will also work with other hospitals to ensure that the needs of their patient population are met.

3. Date for the closure of the Services.

Saturday, September 23, 2023.

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. (Please list).

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HealthAlliance-Clinton Hospital Patient and Family Council (PFAC)
Chair, Mary Lotze
349 Pearl Hill Road
Fitchburg MA, 01420

The Health Equity Partnership of North Central Massachusetts (CHNA 9)
Chelsey Patriss, Executive Director
chna9northcentral@gmail.com

United Way of North Central MA
Kory Eng, President and CEO
649 John Fitch Highway
Fitchburg MA 01420

Spanish American Center
Neddy Latimer, Executive Director
112 Spruce St
Leominster MA 01453

Making Opportunity Count (MOC)
Kevin Reed, Executive Director
601 River Street
Fitchburg, MA 01420

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

At the time of our initial announcement regarding closure of the Services, we reached out to the local community and public officials. The Office of the Attorney General and the Governor's office were provided notice in addition to local municipal leaders of Leominster and Fitchburg including the respective City Council Presidents, the mayors, police, and fire department leaders (detailed below). We have also had discussions with the Patient and Family Council (PFAC) and with members of our Board of Trustees, which represent the community and have diverse backgrounds within the community. We have had ongoing discussion with the staff who work in the unit, as well as all caregivers, and the unions that represent these staff, as well as medical staff at the hospital through the medical staff leadership structure. After May 26, 2023, we continued to inform our hospital

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staff through our leadership structure and weekly information huddles. This information is dispersed to all Hospital employees. The Hospital has had and continues to have significant dialogue with Hospital leaders and staff, including ED personnel, to evaluate the impact of closure of the Services.

In addition, the hospital has met with, or has scheduled meetings with, the following individuals and organizations:

- May 25, 2023: Notified 9 organizations by email and phone (including those referenced above in Question 4) serving the target populations identified in the Hospital's CHNA
- June 7, 2023: Meeting with North Central Massachusetts legislative delegation. Attendees included Representatives Natalie Higgins, Michael Kushmerek, Meghan Kilcoyne, Jonathan Zlotnik, and Margaret Scarsdale, and Kimberly Ferguson.
- June 15, 2023: Meeting held with Leominster Mayor Dean Mazarella, Police Chief and Fire Chief
- June 15, 2023: Discussion at Hospital PFAC monthly scheduled meeting (agenda item)
- June 15, 2023: Attended Joint Coalition on Health
- June 15, 2023: Meeting with Tomaso Caliccio, Director of Specialty Provider Networks at EOHHS
- June 20, 2023: Meeting with Fitchburg Mayor Stephen DiNatale, Police and Fire Chief
- June 22, 2023: Meeting with Montachusett Transit Authority
- June 30, 2023 (scheduled): Follow up meeting with North Central legislative delegation, along with Congressman McGovern and a representative of Congresswoman Trahan.
- Community Partner Information and Listening sessions:
We are focused on continuing to support women's health and access to pre- and post-natal care, based on the needs identified in our Community Health Needs Assessment and in the listening sessions we are scheduling in the community. To help us identify the needs in the community, we are engaging in a series of listening sessions with over 15 community organizations and coalitions.
 - June 13 and June 22, 2023: organizations represented include: North Central Chamber of Commerce, North Central MA Faith Based Coalition, LUK, Inc., Community Health Connections, Spanish American Center, Care Central VNA & Hospice; RCAP, Health Equity

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Partnership of North Central Massachusetts (CHNA 9), New Vue Communities.

- There is a third session scheduled for June 30, 2023: Anticipated participants include United Way of Central MA; Community Foundation of Central MA; Ahmadiyya Muslim Community, WHEAT, and Making Opportunity Count

Thank you for your attention to this matter. If you have any questions, please feel free to contact me.

Sincerely,



Andrew S. Levine

cc: J. Bernice, DPH
M. Bramanate, DPH
S. Carlson, DPH
R. Kaye, Esq., DPH
E. Kelley, DPH
W. Mackie, Esq., DPH
Health Policy Commission
Office of the Attorney General (Massachusetts)
Center for Health Information and Analysis
Executive Office of Labor and Workforce Development