

HUSCH BLACKWELL

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June 27, 2025

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: Holy Family Hospital – 90 Day Notice of Closure of Certain Services

Dear Mr. Davis:

We write on behalf of Holy Family Hospital (“Hospital”) with respect to its campus located at 140 Lincoln Street, Haverhill, MA 01830 (“Haverhill Campus”). Pursuant to 105 CMR 130.122(B), the Hospital hereby provides ninety (90) days’ notice to the Department of Public Health (“Department”) of its decision to discontinue the Hospital’s 59-bed inpatient medical/surgical service, 10-bed intensive care unit (ICU), and emergency department (ED) at Haverhill Campus (the “Notice”). The inpatient psychiatric beds at Haverhill Campus will remain in service and are not impacted by this Notice.

As the Hospital is integrating fully into a new system that includes Lawrence General Hospital (LGH), the hospitals are working strategically to invest in and redeploy care and resources in a more thoughtful, unified manner that better meets the needs of the communities they serve. Planning related to this Notice has further been informed by state, regional, and local leaders.

To that end, the hospitals have determined that the community will be better served by the consolidation of acute medical inpatient services at the Hospital’s Methuen campus and at LGH. Accordingly, Haverhill Campus will close the underutilized inpatient medical/surgical service consisting of 59 beds, as well as the 10-bed ICU service which has been out of service since January 2024. The medical/surgical service’s current average daily census of nine (9) patients can be absorbed by the Hospital’s Methuen campus or by LGH. With the closure of the medical/surgical service, Haverhill Campus’s ED will be converted to a Satellite Emergency Facility (SEF) of the Hospital’s Methuen campus. The SEF will offer the same emergency care services to patients as the existing ED does currently. The Hospital’s SEF Application was submitted to the Department on May 29, 2025.

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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 noted above. 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 full Fiscal Year).

Table 1: HFH Haverhill Discharges

Service	FY2024 (10/1/23 – 9/30/24)	FY2025 YTD (10/1/24 – 5/31/25)
Med/Surg Beds	1,321	830 (1,245 annualized)
ICU Beds	50 (closed 1/1/2024)	n/a - closed
ED (Annual Visits)	20,246	12,647 (18,970 annualized)

Table 2: HFH Haverhill Average Daily Census

Service	FY2024 (10/1/23 – 9/30/24)	FY2025 YTD (10/1/24 – 5/31/25)
Med/Surg Beds	15.17	13.45
ICU Beds	3.4 (closed 1/1/2024)	n/a - closed

Table 3: FY2025 Occupancy (10/1/24 – 5/31/25)

Service	Haverhill	Methuen	Lawrence
Med/Surg Beds	15%	49%	90%
ICU Beds	0%	81%	64%

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

With the simultaneous opening of the proposed SEF, coupled with the availability of inpatient medical services at the Hospital's Methuen campus, the Hospital does not anticipate any negative impact on individuals. The Methuen campus, as well as LGH, will be able to provide a near seamless transition of care delivery. Currently, the majority of inpatients at Haverhill Campus are admitted through the ED. Patients will continue to receive emergency services at the SEF and may be transported to the Methuen campus, LGH, or a tertiary facility if a higher level of care or inpatient admission is needed. As noted in Table 3 above, the Methuen campus has significant capacity to accept the current average daily census of nine (9) patients from Haverhill Campus requiring an inpatient admission.

3. Date for the closure of the Services.

The date of the closure is October 1, 2025.

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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).

Benchmark at Haverhill Crossings
254 Amesbury Road – Rt. 110, Haverhill, Massachusetts 01830

Bethany Community Services
10 Phoenix Row, 4th Floor, Haverhill, MA 01832

Council on Aging
10 Welcome St., Haverhill, MA 01830

Haverhill Housing Authority Kennedy Circle
25 Washington Square # C, Haverhill, MA 01830

Haverhill Latino Coalition
P.O. Box 615, Haverhill, MA 01831

MeVa
85 Railroad Avenue, Haverhill, MA 01835

Wingate Residence of Haverhill
10 Residences Wy, Haverhill, MA 01830

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

The hospitals participated in the Eastern Merrimack Valley Work Group (“Work Group”) which was formed following LGH’s acquisition of the Hospital to help assess the region’s health care needs. It was charged with creating a roadmap for regional healthcare transformation that, among other goals, creates a system that (1) meets the community’s healthcare needs, (2) focuses on safe, high-quality, accessible, and value-based care and (3) is financially viable. Through the Work Group’s review of health care delivery and community needs, it recommended converting Haverhill Campus’s ED to a SEF in order to “concentrate inpatient capacity on Lawrence and Methuen campuses”.¹

¹ Specifically, the Work Group Eastern Merrimack Valley Working Group, “Meeting 15 – Recommendations”. February 6, 2025.

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To inform the community of the proposed changes, representatives of the Hospital communicated with the Hospital's patient and family council, hospital staff, labor organizations representing the Hospital's staff, and state and local representatives and officials. Additionally, the Hospital met with the following individuals regarding opportunities to collaborate in terms of preparing for the changes and sharing information with the community:

- Christina Minicucci, Development Director, MeVa (Merrimack Valley Transit Authority)
- Mary Connolly, City of Haverhill Public Health Director and Council on Aging
- Caeli Tegan Zampach, Director of Health, Human Services & Inspections, and Patrick McCarty, Director of the Human Services Division for the City of Methuen

The Hospital has planned and scheduled a Community Listening Session for Thursday, July 24, 2025 at the Haverhill Public Library. Notice of the Community Listening Session ran in the local paper, the *Lawrence Eagle-Tribune* on Monday June 23, 2025, was shared with 97.9 WHAV, Haverhill's public radio station and local news service, and is posted on HFH and LGH websites. Information related to the closures and proposed SEF are also available on the hospitals' websites². A separate email address³ was created for the community to ask questions about the closures.

The Hospital will communicate directly regarding its overall plans with its skilled nursing facility partners including:

- Penacook Place
- Aspen Hill Rehab & Health Center
- Baker-Katz Skilled Nursing & Rehab Center
- Haverhill Nursing and Rehab (Hannah Duston Healthcare Center)
- Oxford Nursing and Rehab
- Lakeview House Skilled Nursing

Over the coming months, the Hospital will continue to inform the community about the proposed changes through various channels including its website and 97.9 WHAV. Additionally, the Hospital is speaking about the proposed changes at the September meeting of Interface Network of Compassion (INC) in Haverhill, a collaborative group that brings together public, private, and faith-based organizations across the Merrimack Valley.

² https://www.lawrencegeneral.org/sef_faq; https://holyfamilyhospital.org/SEF_FAQ/

³ HaverhillCommunity@LawrenceGeneral.org

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

Sincerely,

HUSCH BLACKWELL LLP



Crystal M. Bloom

cc: T. Smith, DPH
W. Mackie, Esq., DPH
J. Gagne, DPH
J. Bernice, DPH
S. Carlson, DPH
B. McLaughlin, DPH
T. McNamara, DPH

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