



May 12, 2022

Via Email

Stephen Davis, Director
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) – Closure of Infusion and Radiation Oncology at Framingham Union Campus

Dear Mr. Davis:

On behalf of VHS Acquisition Subsidiary Number 9, Inc. (d/b/a MetroWest Medical Center), which operates a licensed hospital (License No. VL8S) with a campus in Framingham, MA (the “Medical Center”), we write in follow-up to the initial essential services closure notice that the Medical Center filed on April 13, 2022 with the Department of Public Health (the “Department”) and the appropriate parties required by the Department’s regulations. Pursuant to 105 CMR 130.122(B), the Medical Center hereby provides the required ninety (90) day notice to the Department of the proposed closure of oncology infusion and radiation oncology services (“Services”) at MetroWest Medical Center Framingham Union Campus, located at 115 Lincoln Street, Framingham, MA 01702. The Medical Center will continue to provide medical oncology, cancer screening, as well as imaging services and cancer-related surgical procedures. We offer the following information in compliance with the Department’s regulations.

The Medical Center’s cancer service consists of medical oncology, oncology infusion services, and radiation oncology. Due to declining demand for its cancer services, the Medical Center determined that its resources should focus on expanding and enhancing programs on the MetroWest campuses including cardiac, behavioral health, surgical services, emergency care and obstetrical services to meet the needs of its patients. The Medical Center recognizes the need for continued access at its Framingham campus to medical oncology, cancer screening, imaging and cancer-related surgical procedures and will continue to provide these services. To facilitate continued access to oncology infusion and radiation therapy, the Medical Center will consolidate its oncology infusion and radiation oncology programs into existing programs at the Medical Center’s sister hospital, Saint Vincent Hospital (“SVH”). The transition will provide patients with access to a broader range of specialized services for their care at SVH. SVH is fully accredited by the Commission on Cancer and offers comprehensive care including medical oncology, oncology infusion, imaging, radiation oncology and rehabilitation. The Medical Center will develop a transition plan for each of its current patients based on patient preference in order to mitigate any disruption in services for patients currently receiving oncology care at the Framingham campus.

1. Current Utilization Rates. The following table details the Service for the last three calendar years (“CY”), including CY22 through April 2022. As detailed below, the Medical Center has experienced a decline in utilization for oncology infusion and radiation oncology services compared to the CY19, or prior to the pandemic. When annualized, utilization of the Medical Center’s oncology infusion

service for CY22 is expected to decrease 10.1% from CY19 and its radiation oncology service is expected to decrease 27.3% for the same time period.

| Total Unique Outpatient Visits | CY19 | CY20 | CY21 | CY22 through April 2022 | CY22 Annualized |
|---------------------------------------|-------------|-------------|-------------|--------------------------------|------------------------|
| Number of Radiation Oncology Visits | 5,294 | 4,312 | 4,512 | 1,283 | 3,849 |
| Number of Infusion Oncology Visits | 3,963 | 3,039 | 3,583 | 1,188 | 3,564 |

Impact of Discontinuance. Due to declining demand, the Medical Center does not anticipate a significant impact from the discontinuation of oncology infusion and radiation oncology services in Framingham. The Medical Center will continue to offer medical oncology, cancer screening, imaging and cancer-related surgical procedures. For current patients of the oncology infusion and radiation oncology services, the Medical Center will provide a seamless transition in care to ensure a smooth transition from the physicians at MetroWest Medical Center to the physicians at SVH or to another provider, based on individual patient choice. Many of the physicians currently providing the services to be discontinued will practice at SVH. As such, many of those patients who choose to transition their care to SVH can continue to receive care from their current physician. If patients decide not to continue their care at SVH, comparable services are available at other hospitals, such as: Milford Regional Hospital, Newton Wellesley Hospital and Dana-Farber Brigham Cancer Center. All relevant patient records will be transferred to the provider of the patient's choice.

2. Date Set of Discontinuance. This ninety (90) day notice is hereby provided for a target closure date of August 9, 2022 for infusion oncology service; however, the radiation oncology service is projected to close on October 31, 2022.
3. Health Care Coalitions and Community Groups.
The following community groups may have an interest in the discontinuation of the Service:
 - American Cancer Society
3 Speen Street, Framingham MA 01701
 - Joe Andruzzi Foundation
49 Plain St #500, North Attleborough, MA 02760
 - Ellie Fund for Breast Cancer
200 Reservoir St, Needham, MA 02494

- Team Cork, Inc.
22 Rosemary Ln, Brewster, MA 02631
- Runway for Recovery
29 Water St Suite 216, Newburyport, MA 01950
- Framingham Community Connections Coalition
88 Lincoln St, Framingham, MA 01702
- MetroWest Free Medical Program
110 Edgell Rd, Framingham, MA 01701
- Susan G Komen Foundation
13770 Noel Road, Suite 801889, Dallas, TX 75380

4. Community Engagement and Planning Activities. The Medical Center conducted the following community engagement and planning activities with respect to the closure of the Service:

- April 12, 2022: Virtual meeting with Representative David Linksy, Representative Carmine Gentile, Representative Jack Lewis, and Representative Maria Robinson regarding proposed essential service closure filing.
- April 12, 2022: Outreach call to Board Chair regarding proposed essential service closure filing.
- April 12, 2022: Outreach call to President of Medical Staff regarding proposed essential service closure filing.
- April 12, 2022: Meeting with the Medical Center's Oncology Services team regarding proposed essential service closure filing.
- April 12, 2022: Outreach call to the Medical Center's Chiefs and Chairs regarding proposed essential service closure filing.
- April 13, 2022: Electronic communication to the Medical Center's Patient Family Advisory Council.
- April 13, 2022: Electronic communication to MetroWest Medical Center's Board of Trustees regarding proposed essential service closure filing.
- April 13, 2022: Electronic communication to Medical Center's Medical Executive Committee, Managers and Directors, Medical Staff and Employees regarding proposed essential service closure filing.

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- April 13, 2022: Verbal notice to Radiation Oncology Affiliate Maryanne Stevenson of proposed essential service closure filing.
- April 13, 2022: Electronic Communication to Framingham and Massachusetts elected officials of proposed essential service closure filing.
- April 13, 2022: Electronic communication to Massachusetts Nurses Association, Mass Laborers, SEIU, and IUOE Local 877 of proposed essential service closure filing.
- April 13, 2022: Verbal notice to Charles River Medical Associates and Reliant Medical Group of proposed essential service closure filing.

Thank you for your attention to this matter. If you have any questions, please contact Crystal Bloom, Esq., Husch Blackwell LLP at 617-598-6783 (crystal.bloom@huschblackwell.com).

Sincerely,



Ava Collins
CEO, MetroWest Medical Center

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