

January 20, 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: Steward Health Care System LLC – Norwood Hospital – Closure of Obstetrics Services

Dear Mr. Davis:

This letter is submitted on behalf of Steward Health Care System LLC, which owns and operates Norwood Hospital located 800 Washington Street, Norwood, Massachusetts 02062 (the "Hospital") in follow-up to the initial essential services closure notice that the Hospital filed on December 22, 2021 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 Hospital hereby provides the required ninety (90) day notice to the Department of the proposed closure of obstetrics services in its hospital. The obstetric services ("Services") include nineteen (19) beds and sixteen (16) bassinets. We offer the following information.

The deliveries will primarily occur at St. Elizabeth's Medical Center ("SEMC") and other hospitals, as needed, which has occurred since the temporary closure of the Hospital in June 2020. This has been a seamless transition made possible by SEMC's capacity. The Hospital also determined that the Services should be discontinued because of the decrease in rate of deliveries. In compliance with 105 CMR 130.122(B), the following information regarding the discontinuation is provided for the Department's review.

1. <u>Current Utilization Rates</u>. The following table details the Services for the last three calendar years ("CY"), including CY21 through November.

Norwood Obstetric Deliveries	CY17	CY18	CY19	CY20	CY21 through November
Norwood Hospital	459	463	433	192	0
St. Elizabeth's Medical Center (performed by Norwood Doctors)	0	0	0	177	317

The table above illustrates the number of deliveries at Norwood Hospital and number of deliveries performed by Norwood Hospital Doctors at SEMC after June 2020.

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- Impact of Discontinuance. The Hospital does not anticipate any impact. Prenatal care for expectant
 mothers will continue locally in Norwood, and deliveries will continue to primarily occur at SEMC and
 other hospitals as needed.
- 3. <u>Date Set of Discontinuance</u>. This ninety (90) day notice is hereby provided for a target closure date of April 20, 2022.
- 4. Health Care Coalitions and Community Groups. Not applicable.
- 5. <u>Community Engagement and Planning Activities</u>. The Hospital has undertaken the following community engagement and planning activities:
 - December 22, 2021: Meeting with Representative Rogers and Senator Rush regarding Department of Public Health filings pertaining to the decision that obstetrical services would no longer be offered at the Hospital.
 - December 22, 2021: Meeting with Hospital's Patient Family Advisory Council.
 - December 20, 2021: Meeting with representatives of the Massachusetts Nurses Association.
 - October 12, 2021: Meeting with Representative Rogers and Senator Rush to discuss maternity transitioning to St. Elizabeth's Medical Center and Good Samaritan Medical Center during closure period.
 - September 22, 2021: Meeting with Steward Medical Group OB/GYN physicians regarding changes to Norwood Hospital services.
 - August 16, 2021: Outreach call to Town of Norwood Select board Chair regarding emergency Determination of Need ("DoN") filing.
 - August 9, 2021: Meeting with Representative Rogers to discuss Norwood Hospital DoN emergency filing and services listed in the DoN.
 - July 28, 2021: Meeting with Massachusetts Executive Office of Health and Human Services and MassHealth to discuss Norwood Hospital rebuild plan and Emergency DoN.

Thank you for your attention to this matter. If you have any questions, please contact Andrew S. Levine, Esq. at Husch Blackwell LLP at (617) 598-6758 (Andrew.levine@huschblackwell.com).

Salvatore Perla, DrPH

Sincerely

President, Norwood Hospital

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cc:

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