

November 23, 2020



Via E-mail

Sherman Lohnes, Esq., Director  
Division of Health Care Facility Licensure and Certification  
Massachusetts Department of Public Health  
67 Forest Street  
Marlborough, MA 01752

Re: Steward Good Samaritan Medical Center, Inc. – Formal 90-Day Notice of Closure of Inpatient and Outpatient Substance Use Disorder Services at Norcap Lodge

Dear Attorney Lohnes:

We write on behalf of Steward Good Samaritan Medical Center, Inc. (“the Medical Center”) in follow-up to the initial essential service 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 October 23, 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 the operation of the Alcoholism Treatment Service (“ATS”) which includes both inpatient services and the intensive outpatient program (“IOP”) at the Medical Center’s inpatient satellite, Norcap Lodge (“Norcap”), located at 71 Walnut Street, Foxborough, MA 02035 (the “Services”). We offer the following comments with respect to this matter.

The Medical Center determined that the Services should be discontinued due to a steady decline in admissions over the past several years, indicating a decreased need for the Services at Norcap. 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 monthly volume at Norcap over the last year through August 2020.

<b>Norcap ATS Historical Utilization</b>			
<b>Month</b>	<b>Patient Days</b>	<b>ADC</b>	<b>Occupancy*</b>
Aug-19	1,073	34.6	80%
Sep-19	928	30.9	72%
Oct-19	1,013	32.7	76%
Nov-19	850	28.3	66%
Dec-19	778	25.1	58%
Jan-20	913	29.5	68%



Feb-20	746	25.7	60%
Mar-20	840	27.1	63%
Apr-20	558	18.6	43%
May-20	659	21.3	49%
Jun-20	584	19.5	45%
Jul-20	692	22.3	52%
Aug-20	550	22.9	53%
<b>TOTAL</b>	<b>10,184</b>	<b>26.1</b>	<b>61%</b>
<b>*(based on 43 licensed beds)</b>			

As evidenced by the above utilization data for the inpatient ATS service, there has been a significant decline in admissions at Norcap in the past year. The average daily census has decreased from 34.6 in August 2019 to 22.9 in August 2020, representing an occupancy rate decrease of nearly 30%. This decline is evidence of a decreased need for the ATS service at Norcap.

Importantly, Norcap has noticed a shift in the admission diagnosis in terms of severity. In recent years, there has been a shift from primarily opioid dependence admissions to primarily alcohol dependence admissions (70% in 2020). Alcohol dependence requires a significantly more complex treatment program due to the higher mortality risk associated with alcohol withdrawal. As such, a significant proportion of Norcap’s existing patient population will benefit from a facility that can offer a higher level of care.

Norcap also has experienced a decline in average daily census of its IOP service for both its daytime and evening programs.

<b>Norcap IOP Historical Utilization</b>			
	<b>2018</b>	<b>2019</b>	<b>2020 YTD<sup>1</sup></b>
Daytime ADC	7.9	8.0	7.0
Evening ADC	6.9	5.8	5.8

Accordingly, the IOP at Norcap will be discontinued when the inpatient services close.

2. Impact of Discontinuance. The Medical Center does not anticipate any negative impact on patient access following the closure of the Services.

<sup>1</sup> Year-to-date includes data through September 2020.



There are numerous Level 3.7 programs in the geographic area that provide sufficient access to meet current demand for the services currently offered at Norcap. This is evidenced by the fact that utilization at Norcap has steadily declined. However, there are no Level 4 beds in the region. Level 4 beds provide medically managed inpatient intensive substance use treatment. In accordance with these findings, on October 23, 2020, Steward Health Care System LLC filed a Determination of Need application for Morton Hospital (“Morton”) to open a 32-bed Level IV Medically Managed Intensive Inpatient Unit. In addition to the inpatient beds, Morton will provide a robust outpatient substance use disorder (“SUD”) service. Therefore, it is anticipated that the outpatient SUD services at Morton will serve as a replacement to the services currently offered at Norcap, while also providing a more intensive level of inpatient care for those who require such treatment. Accordingly, as a coordinated effort to meet the demands of its patient population, while ensuring efficiencies across Steward family hospitals, the Medical Center has decided to discontinue SUD services at Norcap Lodge.

Further, the Medical Center anticipates the new facility at Morton will increase access to SUD services due to its proximity to public transportation. Norcap is located in Foxborough and the IOP can be difficult to access for an individual without reliable access to an automobile for transportation. Morton Hospital, located in Taunton, provides a more comprehensive public transportation option for individuals in need of care. Therefore, the Medical Center anticipates a positive effect on access to the IOP following the transition to Morton Hospital.

3. Date Set of Discontinuance. Notice is hereby given for a target closure date of September 1, 2021. Specifically, discontinuance of the Services at Norcap is anticipated to coincide with the opening of SUD services at Morton pursuant to DoN approval for the proposed project.

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

- Shatterproof™ – is a newly founded non-profit agency focused on opioid addiction recovery. They founded Atlas™ which is a quality data collection group (like Press-Ganey). NORCAP has participated in the patient/family satisfaction survey pilot as directed by BSAS.
- The Friends of NORCAP, a non-profit group for NORCAP alumni.

5. Community Engagement and Planning Activities Prior to the Notice of Closure. The Medical Center has undertaken the following community engagement and planning activities:

- August 12, 2020, 3:00PM- Norcap staff meeting. All employees were invited and representatives from the Massachusetts Nurses Association (MNA) and Service Employees International Union (SEIU) were in attendance.

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- August 13, 2020, 7:00AM- Norcap staff meeting. All employees invited, in particular the nighttime staff who could not attend on the previous date. Labor unions were invited as well but did not attend.
- October 23, 2020,
  - 9:00AM- Norcap Staff Meeting. All Norcap employees were informed that notice of the closure was provided to the Department.
  - Email notice of closure provided to the Medical Center's medical staff, employees, Massachusetts Nurses Association (MNA), Service Employees International Union (SEIU), Massachusetts Senators and Representatives for Brockton and Foxborough, local officials of Brockton and Foxborough, Advisory Board, and the Patient Family Advisory Committee (PFAC).
- November 9, 2020, Virtual Meeting with Senator Feeney and Norcap and Morton leadership to review comprehensive plan for closure of Norcap and new Level 4 unit and outpatient services at Morton.
- As the date of discontinuance approaches, the Medical Center will make the appropriate filings with the DPH Bureau of Substance Abuse Services in accordance with applicable regulatory requirements.

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

Sincerely,

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

Andrew S. Levine

cc: D. Calvert, BSAS  
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