



The Commonwealth of Massachusetts
Executive Office of Health and Human Services
Department of Public Health
Bureau of Health Care Safety and Quality
Division of Health Care Facility Licensure and Certification
67 Forest Street, Marlborough, MA 01752

MAURA T. HEALEY
Governor

KIMBERLEY DRISCOLL
Lieutenant Governor

KATHLEEN E. WALSH
Secretary

ROBERT GOLDSTEIN, MD, PhD
Commissioner

Tel: 617-624-6000
www.mass.gov/dph

May 19, 2025

Lianne Ankner, Esq.
Ankner & Levy, P.C.
10 High Street, Suite 1003
Boston, MA 02110
kla@anknerlevy.com

BY EMAIL ONLY

Re: Review of Response Following Essential Services Finding
Facility: MetroWest Medical Center – Framingham Union Campus
Services: Level IIB Special Care Nursery
Ref. #: VL8S-026

Dear Attorney Ankner:

On May 9, 2025, the Department of Public Health (the "Department") received from you, on behalf of VHS Acquisition Subsidiary Number 9 (d/b/a MetroWest Medical Center), a response to our April 24, 2025 letter indicating that MetroWest Medical Center – Framingham Union Campus (the "Hospital") must file a plan with the Department detailing how access to services will be maintained following the discontinuation of its Level IIB Special Care Nursery. Thank you for responding to our request in a timely and comprehensive manner.

Pursuant to 105 CMR 130.122(G) the Department has completed its review of the submitted access plan. As a result of this review, the Department has prepared the following comments:

1. **Transitioning from Level IIB to IB:** In your response dated May 9, 2025, you stated the Hospital is currently working toward a clinical affiliation model that would provide the required advanced neonatal practitioner coverage, enabling it to sustainably maintain a level IB designation. The Department requests additional information on the steps being taken to transition from Level IIB to IB. Specifically, what needs to happen to enable this transition and what is the timeline.

2. **Census at or Below 25%:** In your response dated May 9, 2025, you stated that the current census of the Level IIB Special Care Nursery is zero neonates, and the census is consistently at or below 25% capacity. Additionally, you stated the demand for the service has been low and is associated with high operating expenses. The Department requests information on what the Hospital has done to staff and market the Level IIB Special Care Nursery in order to evaluate the factors driving the decreased use.
3. **Transfer Agreements:** In your response dated May 9, 2025, you noted the Hospital had entered into detailed clinical transfer agreements with Saint Vincent Hospital and St. Elizabeth's Medical Center (now Boston Medical Center Brighton) which clearly outline care continuity protocols. The Department requests the Hospital provide it with information on what these care continuity protocols are and how/when are they used. Additionally, the Department requests information on the dedicated transfer lines the Hospital has established with Saint Vincent Hospital and Boston Medical Center Brighton. Specifically, how do these transfer lines work and what are the mechanisms that drive the process.
4. **Meetings with Public Officials:** In your response dated May 9, 2025, you stated the Hospital has enhanced its community engagement framework to include monthly meetings with Framingham and Natick public health officials. The Department requests information on when these meetings will take place, what the agenda will be, and for how many months will the meetings be held.
5. **Cultural / Linguistic Needs:** In your response dated May 9, 2025, you stated the Hospital has confirmed with the four primary alternative sites that they have established multilingual education materials and interpreter availability. Additionally, you stated that Hospital staff is undergoing additional cultural competency training. The Department requests additional information on what the four primary alternative sites are doing to accommodate the cultural needs of patients from the Hospital's service area. The Department also requests additional information on the curriculum for the cultural competency training Hospital staff is currently undergoing.

Under the provisions of 105 CMR 130.122(G), the Hospital must submit a timely response to the comments of the Department. Please submit your comments within 10 days of your receipt of this letter to my attention, in order that we may complete our review of the pending changes.

Thank you for your continued cooperation in this process. If you have any questions, please contact me at Stephen.Davis@Mass.Gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Stephen Davis". The signature is fluid and cursive, with the first name "Stephen" written in a larger, more prominent script than the last name "Davis".

Stephen Davis
Division Director

cc: T. Smith, DPH
A. Sousa, DPH
J. Bernice, DPH
K. Fillo, DPH
J. Gagne, DPH
M. Callahan, DPH