

# Encompass Health Corporation

DoN #23050511-HE

## APPLICANT RESPONSES

Responses should be sent to DoN staff at [DPH.DON@State.MA.US](mailto:DPH.DON@State.MA.US)

While you may submit each answer as available, please

- List question number and question for each answer you provide
- Submit responses as a separate word document, using the above application title and number as a running header and page numbers in the footer
- We accept answers on a rolling basis however, when providing the answer to the final question, submit all questions and answers in order in one final document.
- Submit responses in WORD or EXCEL; only use PDF's if absolutely necessary. **Whenever possible, include a table in data format (NOT pdf or picture) with the response.**

In order for us to review this project in a timely manner, please provide the responses by November 13, 2023.

### Factor 1a.ii. – Patient Panel Need

1. **Pages 20-21 in the Narrative states that the additional 17 beds will allow timely admission to the IRF and facilitate the timely discharge of patients from general acute care hospitals. Please provide data on the average wait patients have been experiencing for admission to Encompass Western Mass from CY2020-CY2022.**

Encompass Western Mass does not track wait times because it would only be able to capture data on those patients who are admitted at Encompass Western Mass. As a result, the Hospital would not be able to capture patients who chose another facility or another post-acute discharge option, limiting the value of the data, and as further discussed below, there are limited options for IRF beds in Western Massachusetts.

2. **Page 19 of the narrative states that “Absent a sufficient number of beds at Encompass Western Mass, patients will have to travel outside of their local community to receive care for the wide array of complex medical conditions treated at the Hospital.” Please provide details on how far patients would need to travel for IRF services if unable to gain admission to Encompass Western MA.**

Patients and families must travel significant distances to receive the comprehensive array of services provided at an Encompass owned or affiliated Massachusetts facility, as shown below. The nearest Encompass facility, as well as the nearest IRF hospital, is in Worcester.

**Table 1: Distances from Encompass Western Mass to Other Encompass-affiliated MA Facilities<sup>1</sup>**

<b>Encompass Rehab Hospital</b>	<b>Main Campus</b>	<b>Driving Distance</b>	<b>Time</b>
Fairlawn Rehabilitation Hospital	Worcester	44.7 miles	53 minutes
Encompass Health Rehab Hospital of New England	Woburn	85.0 miles	1 hour, 28 min
Encompass Health Rehab Hospital of Braintree	Braintree	91.4miles	1 hour, 29 min

<sup>1</sup> Source: Google Maps. Note: times and distances reflect the shortest travel time for mid-morning travel Monday, November 13, 2023.

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Though there may be geographically closer options for patients in need of IRF services, the alternative IRF providers predominantly care for stroke and orthopedic patients, as shown below. Moreover, the nearest IRF options are units of acute care hospitals and therefore serve a more limited number of patients annually.

**Table 2: Encompass Western Mass Provides a Comprehensive Array of Services<sup>2</sup>**

Conditions Treated	Weldon Center for Rehab	Noble Hospital	Encompass Western Mass
Stroke	84	53	184
Hip or knee replacement, amputation or other bone or joint condition	38	27	279
Hip or femur fracture	22	31	118
Brain injury (traumatic)	17	13	49
Nervous system disorder (excluding stroke)	14	11	143
Spinal cord disease or condition (non-traumatic)	14	<11	22
Brain disease or conditions (non-traumatic)	<11	<11	70
Spinal cord injury (traumatic)	<11	<11	<11
All Other Conditions	37	55	318
<b>Total</b>	<b>246</b>	<b>220</b>	<b>1,193</b>

## Factor 5: Relative Merit

3. **The Narrative (pages 37-38) details that only one alternative option to the Proposed Project was considered. Please provide information about any additional methods that may have been considered to manage the high rate of referrals to Encompass Western Mass and details on why those options were rejected.**

An additional alternative that was considered was the establishment of a satellite facility in Western Massachusetts. However, that alternative was rejected because it would have been a more costly alternative that required either new construction or a long-term lease of space rather than minor renovation and use of existing vacant space in the Hospital. Moreover, the construction or lease of additional space to house the 17-bed expansion would result in the Hospital continuing to operate less efficient now than expected post-implementation when the facility's existing infrastructure, support staff, and the vast majority of its staff members will be optimally utilized.

<sup>2</sup> Source: CMS Compare; <https://www.medicare.gov/care-compare/compare?providerType=InpatientRehabilitation&providerIds=223030,22T066,22T065&city=Ludlow&state=MA&zipcode=>

Notes: Data last updated: September 27, 2023. Time period of data is CY2022.