

HUSCH BLACKWELL

Andrew S. Levine
Partner

One Beacon Street, Suite 1320
Boston, MA 02108
Direct: 617.598.6758
Fax: 617.720.5092
andrew.levine@huschblackwell.com

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VIA E-MAIL - stephen.davis@state.ma.us

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 - Response Plan

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 response to the Department of Public Health's (the "Department") Essential Services Finding letter dated March 2, 2022, and pursuant to 105 CMR 130.122(F), the Hospital presents the following response plan detailing how access to Obstetrics Services will be maintained for the residents of the Hospital's service area.

(1) Information on utilization of the services prior to proposed closure

The following Figure 1 represents the Hospital's total deliveries beginning in CY 2019 through CY 2021. The table also includes the number of deliveries performed by Norwood Hospital doctors at St. Elizabeth's Medical Center ("SEMC") after June 2020, when the Hospital temporarily closed due to the flood and storm. In 2020 and 2021 there were a total of 495 Norwood deliveries at SEMC. The Norwood obstetricians have chosen SEMC as the site for delivering the babies of their patients.

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Figure 1

Total Deliveries	2019	2020	2021
St. Elizabeth's Medical Center ("SEMC")	862	1042 (total) 879 (SEMC Only)	1197 (total) 865 (SEMC Only)
Norwood Hospital	423	192	0
Norwood Deliveries at SEMC	0	163	332

(2) Information on the location and service capacity of alternative delivery sites. Include an explanation of the basis for the Hospital's determination that the alternative delivery sites *do or do not* have the capacity (necessary space, resources, etc.) to handle the increased patient volume at the identified sites. To support that assertion, please provide the following specific details:

(a) Current utilization at these alternative sites

Although Obstetrics services at Norwood Hospital has discontinued, Norwood obstetricians have arranged to deliver their patients' babies at SEMC. As indicated above, SEMC is the delivery site utilized by the Norwood obstetricians. Patients have alternative hospitals where their babies can be delivered. Patients can choose to go to Good Samaritan Medical Center ("Good Samaritan") or other physician practices if they desire. However, the Norwood obstetricians only deliver at SEMC. SEMC and Good Samaritan are geographically close to the City of Norwood. See Figure 2a below.

SEMC and Good Samaritan have the capacity to provide obstetric services to the patient community. It is anticipated that patients who are part of the Norwood Obstetrician practice will continue to have their babies delivered at SEMC, which is approximately 16.7 miles away from Norwood Hospital. Good Samaritan is approximately 11.3 miles from Norwood Hospital.

In Figure 2-a are current utilizations for deliveries at alternate sites for a twelve (12) month period in 2021. Information was provided by each of the alternative sites.

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Figure 2-a

Hospital	Location	Distance (miles)	Total Births	Average per Month
St. Elizabeth's Medical Center	Brighton	16.7	1197	99.8
Good Samaritan Medical Center	Brockton	11.3	607	50.6

As illustrated above, SEMC and Good Samaritan have capacity to provide, and have been available since June 2020, to provide equivalent services to the Norwood patient community.

(b) Type of services available at the alternative sites

The St. Margaret's Center at SEMC provides comprehensive maternity services with personalized care provided by highly trained OB-GYNs who practice in convenient, accessible locations. SEMC's expert maternity team offers comprehensive maternal care throughout the birthing experience. SEMC's doctors, physician assistants, nurse-midwives and specially trained nurses provide expert care throughout labor, delivery and postpartum to make sure the patient's and the baby's needs are met.

St Margaret's at SEMC is a Level IV maternal care center, the highest designation available from the American College of Obstetricians and Gynecologists. SEMC is prepared to care for a wide range of pregnancies, from uncomplicated to the highest level of complexity. General Obstetrics is staffed with a highly skilled and passionate obstetrics team from the early stages of pregnancy planning, through childbirth and beyond. SEMC offers women the option of choosing a nurse-midwife for gynecologic and obstetric care, including annual pelvic and breast exams, preconception counseling, prenatal care, postpartum care, and breastfeeding support. SEMC offers a High-Risk Obstetrics and Antepartum Care (Maternal-fetal medicine) program. The high-risk obstetrics group (maternal-fetal medicine) at SEMC focuses on helping women through challenging pregnancies by providing the most advanced level of specialized medical care and services.

The Well Baby Nursery at SEMC center offers a family-centered approach to well newborn care, integrating up-to-date best practices and with access to a wide variety of Mass General for Children subspecialty services. Full-day coverage by a team of Massachusetts General Hospital physicians and nurse practitioners (with overnight coverage provided by in-house neonatologists) ensures that both well babies and babies with non-critical medical issues can safely remain with their parents throughout their hospital stay. The level III Neonatal Intensive Care Unit (NICU) at SEMC is one of only a handful of units in the Boston area that provide the most advanced evidence-based care

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and technology for premature and critically ill newborns. SEMC offers world-class care for newborns through a clinical collaboration with Mass General for Children, a nationally recognized leader in comprehensive newborn medicine. The NICU is staffed 24/7 by Mass General Hospital for Children physicians. Patients have access to in house Mass General for Children pediatricians around the clock, seven days a week.

SEMC also offers a team of certified Lactation consultants and experienced nursing staff to all mothers who choose to breastfeed. The certified Lactation Consultants (IBCLC's) and nursing staff will support patients with Prenatal breastfeeding classes, Postpartum breastfeeding education, and provide NICU parents with support and education and weekly outpatient support groups.

The Good Samaritan Medical Center Maternity Department is staffed with a highly experienced and compassionate team of physicians, and obstetrical nurses and support staff. The maternity department offers 100% private labor, delivery, and recovery rooms. The Level II special care nursery is staffed by physicians from Mass General Hospital for Children. Maternal Fetal Medicine physicians are available to consult on high risk pregnancies and the hospital's partnership with SEMC allows for continuity of care in the need for higher level services. The Maternity Department offers prenatal education and support to help each family prepare for their growing family, provides breastfeeding support by certified lactation specialists and Mommy and Me infant care and breastfeeding support for new moms.

Education and support are an essential part of the program. Numerous classes are offered to support patients that include childbirth education, prenatal infant care and breastfeeding classes, and sibling classes are available for big brother or sister and Mommy & Me. Good Samaritan's Maternity Department is proud to have a Baby-Friendly Hospital designation from Baby-Friendly USA. The Baby-Friendly Hospital Initiative is a global initiative of the World Health Organization (WHO) and the United Nations Children's Fund (UNICEF). This status is granted to hospitals that demonstrate a high commitment to breastfeeding support and education for its patients.

(c) Type of medical diagnoses accepted

SEMC provides 24-hour coverage for all medical diagnoses including both high risk birth and low risk physiologic labor and birth. The high risk obstetrics group (maternal-fetal medicine) at SEMC focuses on helping women through challenging pregnancies by providing the most advanced level of specialized medical care and services. High risk birth services are provided by the Neonatal Intensive Care Unit which is a collaboration with Mass General Hospital for Children. The Unit provides evaluation and treatment of all obstetrical problems and medical conditions of pregnancy including hypertensive disorders, diabetes, preterm labor, term labor, and delivery.

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Good Samaritan Maternity department provides care for the following medical diagnoses: low risk women with uncomplicated singleton pregnancies greater than or equal to 35 weeks gestation; twin pregnancies greater than or equal to 35 weeks gestation without complications; trial of labor after cesarean delivery; anticipated uncomplicated cesarean deliveries; preeclampsia without severe features greater than or equal to 35 weeks; gestational diabetes well controlled by diet or oral hypoglycemic medications and not requiring intravenous insulin during labor; and other conditions including BMI < 40 or substance use disorders if meeting Level 1 criteria. High risk pregnancies are coordinated with the transfer to SEMC.

(d) Adequacy of space and resources at the alternative sites

The St. Margaret's Maternity center at SEMC has eighteen (18) maternity beds and twenty (20) bassinets. With the closure of Norwood Hospital due to the devastating flood and storm in June 2020, the medical center has seen volume growth by an additional 28 deliveries per month (336 annualized) and has had no issues handling this extra volume. The anticipated increase in volume would put their deliveries at approximately 1,200 per year which they are staffed and equipped to accept. With the volume of births combined with Norwood Hospital, SEMC is operating at a 75% occupancy with still room for more growth.

The maternity department at Good Samaritan has sixteen (16) maternity beds and seventeen (17) bassinets with an additional ten (10) special care nursery bassinets. Although Good Samaritan delivered approximately 607 babies in 2021, they previously had performed well above that volume with some years closer to 800 (2017 and 2018) deliveries. Therefore, there is adequate space and capacity is not a concern.

(3) Travel times to alternative service delivery sites, for both peak and non-peak travel times, and an explanation as to the source for this information or what these estimates are based on.

The following represents the distance and approximate peak and non-peak time to alternate delivery sites from Norwood Hospital. Travel times were calculated using the Google Maps application.

Hospital	Address	City	Peak (minutes)	Non-Peak (minutes)
St. Elizabeth's Medical Center	736 Cambridge Street	Brighton	39	30
Good Samaritan Medical Center	235 N Pearl Street	Brockton	25	20

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Most travel times are less than one half hour. Ambulance travel times are significantly less than patient travel times, therefore patients calling 911 for emergency medical services from home or being transferred will face less travel time.

(4) An assessment of transportation needs post discontinuance and a plan for meeting those needs

There have been no transportation issues in the almost two years since Norwood Hospital temporarily closed in June 2020. Since June 2020, the Norwood physicians have worked with expectant mothers to have deliveries at SEMC. In an emergency any patient may call 911 and be transported by ambulance to SEMC, Good Samaritan or another appropriate hospital.

All prenatal care for expectant mothers continues locally in Norwood at Steward Medical OB/GYN Group located at 886 Washington Street, Norwood, MA 02062. There have been no transportation needs after the closure of Norwood Hospital because patients have visited the physician practice the same way they did previously, and in addition, the practice is conveniently located on a bus line.

(5) A protocol that details mechanisms to maintain continuity of care for current patients of the discontinued service

As indicated above in Response Number 4, prenatal care is provided locally in Norwood at Steward Medical OB/GYN Group, which remained open during Norwood's closure in June 2020. New and current obstetrical patients can continue to receive prenatal care at this practice as they have always done.

(6) A protocol that describes how patients in the Hospital's service area will access the services at alternative delivery sites. The protocol should specifically address the following:

(a) The process that will be employed to effectively refer patients to other facilities or providers

For routine care, Norwood physicians locally will continue to provide outpatient prenatal care.

For expectant mothers who are in labor or believe they are near delivery can be driven to SEMC or Good Samaritan. If they cannot drive, they have the option to call 911 and be taken by ambulance to SEMC or Good Samaritan or other appropriate hospitals.

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(b) The impact that this may have on the current occupancy rates at alternative delivery sites

As demonstrated in Section 1(a) above, there is capacity at SEMC and Good Samaritan. Closure of the obstetrics services at Norwood Hospital has had minimal impact on the occupancy rates at SEMC and Good Samaritan. The additional deliveries from Norwood Hospital will not put SEMC or Good Samaritan anywhere near or at capacity. Since June 2020 there has been no issues with capacity and the Hospital does not anticipate issues in the future.

(c) The ability of the alternative delivery sites to meet the needs of these patients

The Chief Medical Officer at SEMC, the Chair of the Department of Obstetrics-Gynecology, the Vice President of Operations and President have all communicated to Norwood Hospital that their facilities have the capacity and resources to handle the additional volume. This is evident as they have acquired all the Norwood OB/GYN deliveries in 2021 and half of the deliveries in 2020 without a resource or capacity issue. A similar communication from Good Samaritan that included communication from their President, Chair of OB/GYN and chief medical officer that they have additional capacity to accept patients from the Norwood region without concern.

(d) Other alternatives if medical needs cannot be accommodated at the proposed alternative sites

Norwood Hospital traditionally referred and or transferred pregnant patients from Norwood Hospital to SEMC who required more advanced care. Based on the existing relationship in Norwood Hospital's network, the following high risk conditions include, but are not limited to, a BMI of 50 and above, pregestational diabetes, IUGR <1500 mg, maternal cardiac or complex medical conditions, fetal anomalies necessitating NICU, etc. would result in a transfer to SEMC. Individuals that exceed the medical capacity of SEMC would be transferred to the Mass General Hospital for Children who currently operate the NICU at SEMC. This partnership has been in place for several years.

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Thank you for your attention to this matter. Please do not hesitate to contact me if you have any questions or require additional information.

Sincerely,



Andrew S. Levine

cc: Salvatore Perla
Nathalie Hibble, Esq.
Adam Marx
E. Kelley, DPH
W. Mackie, Esq. DPH
R. Kaye, Esq., DPH
J. Bernice, DPH
S. Carlson, DPH