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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: VHS Acquisition Subsidiary Number 9, Inc. (d/b/a MetroWest Medical Center) –
Closure of Oncology Infusion and Radiation Oncology at Framingham Union
Campus Response Plan

Dear Mr. Davis:

This letter is submitted on behalf of VHS Acquisition Subsidiary Number 9, Inc. (d/b/a MetroWest Medical Center) (“MWMC”) regarding the closure of the infusion and radiation oncology services at MetroWest Medical Center Framingham Union Campus located at 99 Lincoln St., Framingham, MA 01702. In response to the Department of Public Health’s (“Department”) Essential Services Finding letter dated July 22, 2022, and pursuant to 105 CMR 130.122(F), the Medical Center presents the following plan detailing how access to oncology infusion and radiation oncology services will be maintained for the residents of MWMC’s service area.

As the Department is aware, MWMC is actively negotiating with Tufts Medicine to ensure that the services continue and that Tufts Medical Center (“Tufts MC”) becomes the licensed provider of the services in the current location. Assuming that occurs, the services will remain available at the site. If for whatever reason the proposed transaction does not move forward, then MWMC will proceed with the planned closures. At this point, MWMC will not close oncology infusion services on August 9th as originally planned, but rather MWMC has set a new date no later than October 31, 2022. The closure of oncology infusion and radiation oncology would only occur in October if the transition of services to Tufts MC does not occur.

Stephen Davis, Director
Division of Health Care Facility Licensure and Certification
Department of Public Health
August 5, 2022
Page 2

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

Since utilization data was last provided to the Department, MWMC performed 1107 oncology infusions and 822 radiation therapy treatments from May through July 28, 2022.

(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

MWMC intends for Tufts MC to become the licensed provider of cancer services in the current location. MWMC will maintain operation for a reasonable period of time, no later than October 31, 2022 to ensure continuity of services before Tufts MC becomes the licensed provider. However, if Tufts MC does not become the licensed provider, Saint Vincent Hospital's Cancer and Wellness Center ("Saint Vincent") is an alternative site where patients can receive excellent care and comparable services. Saint Vincent has the capacity to provide oncology infusion and radiation oncology services to the MWMC patient community. The utilization of oncology infusion services at Saint Vincent is less than 50% of its 31 available infusion chairs and appointments are available immediately with oncology providers. Saint Vincent can also accommodate the MWMC radiation oncology patients.

(b) Type of services available at the alternative sites

Assuming Tufts MC becomes the licensed provider, it will provide the same services currently available to MWMC patients. In the alternative, patients who choose to obtain care at Saint Vincent will have access to comprehensive services including oncology infusion, radiation oncology, a breast center, physical therapy, mammography, ultrasound, nutritional counseling, financial counseling, social work, and survivorship resources. Saint Vincent is accredited by the Commission on Cancer, which means Saint Vincent is committed to ensuring that its patients have access to the full scope of services required to diagnose, treat, rehabilitate, and support patients and their families who are faced with cancer. Saint Vincent also offers individualized rehabilitation assessments and treatment to address any impairment as a result of cancer and its treatment.

(c) Type of medical diagnoses accepted

Tufts MC plans to accept all medical / oncological diagnoses currently treated by MWMC. In addition, Saint Vincent provides care for all cancer diagnoses currently treated by MWMC.

Stephen Davis, Director
Division of Health Care Facility Licensure and Certification
Department of Public Health
August 5, 2022
Page 3

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

The proposed Tufts MC cancer service on the MWMC campus will utilize the same space and resources as currently available under the MWMC license. In the alternative, as discussed throughout this letter, the physical space and resources available at Saint Vincent also are adequate to meet the needs of patients.

(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 times to St. Vincent from MWMC.

Hospital	Address	Peak¹ (minutes)	Non-Peak (minutes)	Miles
Saint Vincent Cancer and Wellness Center	1 Eaton Place, Worcester	40	34	20.9

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

Assuming a transition occurs with Tufts MC, patients will have the option to continue their care with Tufts MC at the current location. For patients who seek care elsewhere, including at Saint Vincent, MWMC will work with patients in need of transportation assistance and help to identify transportation services and community resources that are available to provide transportation. MWMC contracts with Uber Health for reliable, on-demand transportation services for patients.

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

Assuming a transition occurs with Tufts MC, patients will have the option to continue their care with Tufts MC. For patients who choose to continue their care through Tufts MC at MWMC, the hospitals will coordinate a smooth transition, including facilitating insurance referrals, medical records transfer, and confer among providers.

If the Tufts MC change does not occur, for patients who choose to transfer their care to Saint Vincent or to another provider, MWMC will facilitate appropriate insurance referrals and will coordinate to schedule appointments. Medical records will be transferred to the accepting oncologists to facilitate care transition and MWMC oncologists will be available to discuss

¹ Peak travel times were calculated on Google Maps based on the following hours: 8 a.m. – 9 a.m. and 4 p.m. – 5 p.m.

Stephen Davis, Director
Division of Health Care Facility Licensure and Certification
Department of Public Health
August 5, 2022
Page 4

individual patient cases. For both oncology infusion and radiation oncology patients, the MWMC oncology teams will facilitate a coordinated transition plan for patients that who transfer their care.

(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

Tufts MC would offer the same services for patients of MWMC, and the hospitals will work together to ensure that the appropriate referrals are in place to transition care to Tufts MC at the current location. As discussed in response to Section 5, if the Tufts MC change does not occur, for patients who decide to transfer care to Saint Vincent or to another provider, the healthcare team at MWMC will assist patients with transitioning their care. The MWMC team will work with each patient's new oncology team to ensure a smooth transition.

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

As discussed in Section 2(a), Saint Vincent can accommodate MWMC patients receiving infusion oncology and radiation oncology. Saint Vincent does not anticipate an adverse impact on current utilization rates.

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

Please refer to the response in section 2 above. Saint Vincent has capacity to meet the needs of MWMC's existing oncology infusion patients and radiation oncology patients. Further, Tufts MC and Saint Vincent offer the same services and accept the same diagnoses as are currently treated at MWMC.

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

MWMC has developed two options for patients upon its discontinuance of the services under the MWMC license. This includes Tufts MC becoming the licensed provider of the same services in the same location. In the alternative, Saint Vincent has the capability and capacity to provide care to any MWMC patient who chooses to transition to Saint Vincent. If a patient chooses to move their care to a different location, the MWMC oncology team would follow the same process as if it was transferring that patient's care to SVH.

Stephen Davis, Director
Division of Health Care Facility Licensure and Certification
Department of Public Health
August 5, 2022
Page 5

MWMC submits the following responses to the Department's additional request.

- (1) Increased Costs and Acceptance of Insurance Plans: Based on testimony submitted to the Department and presented at the hearing on July 6, 2022, concern was expressed regarding the additional expenses associated with receiving care from Tufts Medical Center in the event they step in as a successor provider at Framingham Union Campus. Additionally, concern was raised over insurance plans being accepted by alternate care sites once MetroWest Medical Center stops providing Oncology Infusion and Radiation Oncology services. The plan which you are required to submit must provide information on what will be done to ensure patients receive services where the cost sharing required of them is at the same, or discounted rates, to what was received through the Hospital.**

MWMC and Tufts have compared payer coverage for all patients currently receiving care for at the MWMC cancer center. There appears to be only one payer that Tufts does not accept (Aetna SR). For patients who have this insurance or others for which there may be difficulty, Tufts MC is committed to working with patients and with the payer on a case-by-case basis to obtain appropriate approvals.

- (2) Continuity of Care: Based on testimony submitted to the Department and presented at the hearing on July 6, 2022, concern was expressed regarding how patients currently at the Hospital will maintain a continuity of care in the event Oncology Infusion and Radiation Oncology services are discontinued or Tufts Medical Center steps in as a successor provider. The plan which you are required to submit must address both scenarios and include details on what will be done to ensure transition plans are in place for affected patients. Additionally, the plan must provide details on how aftercare will be provided for patients using services that will still be provided by the Hospital, such as cancer-related imaging services and surgical procedures.**

Tufts MC plans to offer the same services as are currently available at MWMC and the hospitals will work together to ensure that the appropriate referrals are in place to transition care to Tufts MC. If the Tufts MC transition does not occur, for those patients who decide to transfer their care to Saint Vincent, the healthcare team at MWMC will assist in scheduling appointments at Saint Vincent. The MWMC oncology team will provide patient medical records to the Saint Vincent oncologist. In addition, the MWMC oncology team will review individual patient treatment plans with the Saint Vincent oncology team. For those patients who need pre- or post-surgical oncologic care, the MWMC surgical team will coordinate closely with the Saint Vincent oncology team to ensure a well-coordinated course of treatment for the entirety of the patient's care needs.

Stephen Davis, Director
Division of Health Care Facility Licensure and Certification
Department of Public Health
August 5, 2022
Page 6

- (3) Transportation: Based on testimony submitted to the Department and presented at the hearing on July 6, 2022, concern was expressed regarding the need for sick patients to travel long distances to alternate providers once the Hospital discontinues Oncology Infusion and Radiation Oncology services. The plan which you are required to submit must include details on how this will be addressed in the event Oncology Infusion and Radiation Oncology services are discontinued or Tufts Medical Center steps in as a successor provider.**

MWMC contracts with Uber Health for reliable, on-demand transportation services for patients. Current patients who require transportation assistance will have access to this service. In addition, MWMC will provide patients with information regarding other resources in the area that may offer transportation including houses of worship and local aging councils.

- (4) In-Person Translation Services: Based on testimony submitted to the Department and presented at the hearing on July 6, 2022, concern was expressed regarding the elimination in-person translation services at Framingham Union Hospital. The plan which you are required to submit must include information regarding the Hospital's plans to ensure the health needs of culturally and linguistically diverse patients and communities of color will be met once in-person translation services are eliminated.**

MWMC contracts with a 3rd party vendor for interpretation services as permitted by DPH regulations. This includes the use of portable units to provide interpretation services on demand in the patient's language. This is provided with audio and video communication. In-person interpretation services are also available via the interpreter contract. MWMC's closure of services does not affect and is completely unrelated to translation services.

- (5) Continued Cutbacks: Include specific details on continued access to the remaining medical oncology services, cancer screening, imaging services and cancer-related surgeries. Additionally, the plan must address plans to ensure the ongoing provision of community relations services throughout the hospital. Based on testimony submitted to the Department and presented at the hearing on July 6, 2022, concern was expressed regarding continuing cutbacks and the erosion of services at the Hospital including community relations. The plan which you are required to submit must include specific details on continued access to the remaining medical oncology services, cancer screening, imaging services and cancer-related surgical procedures. Additionally, the plan must address plans to ensure the ongoing provision of community relation services throughout the Hospital.**

Assuming the planned transition occurs, Tufts MC will provide services in the current location. MWMC will continue to offer all cancer screening testing (mammography, low dose lung CT, screening, colonoscopies, etc.). MWMC also will continue to offer cancer-related imaging,

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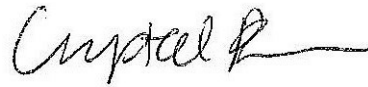
Stephen Davis, Director
Division of Health Care Facility Licensure and Certification
Department of Public Health
August 5, 2022
Page 7

surgery and other procedures. MWMC will work with the Tufts MC oncology team as it does with all other specialists who utilize hospital services to ensure a smooth working relationship and development of coordinated care plans for patients.

An existing MWMC leader has been chosen to fulfill the community liaison role. This individual worked closely with the prior community liaison and fully understands the importance of the role and how to ensure that MWMC remains well connected to the community. The new community liaison has already begun to meet with community groups and will soon be reaching out to other groups and engaging in community events.

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,



Crystal M. Bloom

cc: E. Kelly, DPH
J. Bernice, DPH
R. Kaye, Esq., DPH
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