



Dear Mr. Davis:

This letter is submitted by Steward Health Care, LLC in response to the Department of Public Health's (the Department) letter, dated August 19, 2024, to request additional information regarding the closure plan for Carney Hospital (Carney or the Hospital). We offer the following information in response to the Department's letter:

- 1. Information on the location and service capacity of alternative delivery sites:** The Department has requested an assessment of the location and service capacity of alternative delivery sites for each of the licensed services, including all ambulatory services, which may include transferring services to the Seton Medical Office Building (MOB). The Department has indicated that it is particularly interested in those services that would no longer be available and requested that we communicate with alternative providers to obtain information on wait times.

Carney Hospital identified Beth Israel Deaconess Milton Hospital, Boston Medical Center, and St. Elizabeth's Medical Center as alternative sites for care in the community. Below is a list of the services that these hospitals provide. These hospitals provide the similar and, in some cases, even more comprehensive specialties. The only services not provided at any of the sites listed is inpatient adolescent behavioral health.

Beth Israel Milton Hospital  2.2 miles. <ul style="list-style-type: none"><li>• Off-peak travel time: 6 minutes</li><li>• Peak travel time: 14 minutes</li></ul>	Anesthesia, Neurology/Neurosurgery, Orthopedics, Kidney Care, Lab Services, Pulmonology, Gastroenterology, Gynecology, Heart and Vascular, Behavioral Health, Rheumatology, Bariatric Surgery, Critical Care, Endocrinology, ENT Primary Care, Urgent Care, Emergency Care, Sports Medicine, Surgery, Telehealth, Spine Care, Sleep Health, Senior Health, Urology, Podiatry, Pain Management, Maternity Care, and Rehabilitation.
Boston Medical Center  6.1 miles <ul style="list-style-type: none"><li>• Off-Peak travel time: 31 minutes</li><li>• Peak travel time: 31 minutes</li></ul>	Addiction Medicine, Primary Care, Anesthesia, Cancer Center, Cardiovascular Center, Dentistry, Dermatology, ENT, Emergency Medicine, Endocrinology, Family Medicine, Gastroenterology, Geriatrics, Gender Care Center, Infectious Disease, Kidney Transplant Surgery, Lab Services, Neurology/Neurosurgery, Nutrition and Weight Management, Obstetrics and Gynecology, Ophthalmology, Oral and Maxillofacial Surgery, Plastic Surgery, Plastic Surgery, Podiatry, Psychiatry, Physical and Occupational Therapy, Pediatric Primary Care, Pharmacy Pulmonology, Radiology, Renal Medicine, Rheumatology, Surgery Thoracic Surgery, Urology, Travel Medicine, Weight Loss Surgery, and Women's Health
St. Elizabeth's Medical Center  12 miles <ul style="list-style-type: none"><li>• Off-peak travel time: 30 minutes</li><li>• Peak travel time: 30 minutes to 1 hour</li></ul>	Addiction Medicine, Bariatrics, Behavioral Health, Breast Care, Cancer Care, Dermatology, ENT, Emergency Care, Endocrinology, Eye Care, Gastroenterology, Geriatrics, Gynecology and Urogynecology, Heart Care, Center of Advanced Cardiac Surgery, Interventional Cardiology, Diagnostic Imaging, Infectious Disease, Kidney Care, Surgical Services, Maternity, Neonatal Care, Neurology, Neurosurgery, Stroke, Orthopedics, Pain Management, Physical and Occupational Therapy, Plastic Surgery, Primary Care, Pulmonary Medicine, Rheumatology, Robotic Surgery, Sleep Medicine, Sports Medicine, Hearing Aid Center, Thoracic Surgery, Urology, Vascular and Endovascular Surgery, and Vascular Medicine

The following outpatient services will not be available in the Seton Medical Office Building; however, they are available at the alternative sites. A capacity assessment was conducted at the alternative sites for the next available 3<sup>rd</sup> appointment- see below:

3 <sup>rd</sup> Next Appointment			
Specialty	BMC	SEMC	BID/MILTON
MRI	Sep 09,2024	Aug 30,2024	Sep 13,2024
	617 414 9729	617 779 3160	617 313 1140
CT	Sep 09,2024	Aug 23,2024	Sept 25,2025
	617 414 9729	617 779 3160	617 313 1140
X-Ray	walk in	walk in	walk in
	617 414 9729	617 779 3160	617 313 1140
OBGYN	Wait List Only 11/2025	Sept 09,2024	Feb 03/2025
	617 414 2000	617 789 3023	617 667 4600
ORTHO	Nov, 06,2024	Sept 09,2024	Oct 10,2024
	617 638 5633	617 779 6500	617 696 5160

Steward Health Care is does not have the capacity as a company to provide any ongoing assistance and communication other than the Patient Assistance Line once the hospital has ceased operations.

2. **An assessment of transportation needs post Hospital closure:** The Department has requested information on how the Hospital assessed the transportation needs of its patients and the community, the results of that assessment, and how the Hospital intends on meeting those assessed needs.

The transportation needs of patients are assessed on each patient at the time of admission through multiple assessments. This information is used as part of the multidisciplinary discharge plan. This information is also available in the electronic medical record (EMR) to the outpatient providers. Nursing completes Health Related Social Needs (HRSN) Assessment on admission. The most recent data from our medical records, January 1, 2024 – current reveals very few (3.5%) of our of patients identify transportation as a barrier to healthcare.

Steward Health Care does not have the capacity as a company to provide any ongoing assistance with transportation needs other than the vouchers that will be made available once the hospital has ceased operations.

3. **A protocol that details mechanisms to maintain continuity of care for current patients:** The Department has requested additional details on how it intends to meet continuity of care needs for current patients both immediately prior to the hospital closing and once the Hospital has closed.

The details for alternative care including alternate sites and providers are outlined in the letters the patients will be receiving. In addition, the Patient Assistance Line will be activated starting 8/26/24. St. Elizabeth's Medical Center and Good Samaritan Medical Center will continue to provide ongoing services to patients requiring continued care.

Steward Health Care does not have the capacity as a company to provide any ongoing assistance and communication other than the Patient Assistance Line once the Hospital has ceased operations.

4. **Obtaining Service at Alternative Delivery Sites:** The Department has requested information as to how patients will receive services at alternative delivery sites and what steps the Hospital has taken to assist patients in obtaining services at alternative delivery sites.

The hospital standard of care is to provide all patients a comprehensive discharge plan inclusive of a follow up appointment. Patients can opt to continue with their current providers in the Seton Medical Office Building, at a location provided in the informational letter, or at a location of their choice. A Patient Assistance Line will be available for patients to help transition to alternative providers and answer any questions related to the hospital closure and its impact on their care.

See Appendix A

5. **Additional Directive 2:** The Department has requested additional information regarding run times after Hospital closure.

The Hospital must defer to local EMS providers for an assessment of their anticipated run time changes as the Hospital is unable to review their internal data. Steward Health Care staff have communicated with the local EMS providers to understand the impact of the closure and from that communication we know that local EMS crews are preparing for potential changes in service due to the closure.

In addition, the Department requested the following:

- a. With the cessation of primary stroke services on 08/16, the Hospital must communicate this change through CMED as an unavailable service notification.

On August 16, 2024, Carney Hospital stopped inpatient admissions for the stroke services. The Carney Hospital emergency department will continue to have the same stroke designation (primary stroke center) up to the time of closure on Saturday August 31, 2024. CMED is aware of the closure date. All patients presenting at the Hospital prior to 7 AM on August 31, 2024, will be seen, medically screened, and be evaluated/treated for stroke if indicated. This will include CT, CTA, labs, as well as administering a thrombolytic if indicated. They will also have a neurologist who will be available to assess the patient remotely.

- b. The Department requested information regarding relocation plan for the Boston EMS Paramedic truck housed in a garage on the Hospital's grounds.

Boston EMS has been notified of the hospital closure date and the need to relocate the EMS Paramedic truck housed on the hospital grounds by September 20, 2024. The Chief has been given the contact information for the property owners legal counsel in the event they want to pursue an agreement to remain onsite.

- c. The Department requested information on Hospital's plan to remove/relocate EMS/public safety radio/communication equipment located on the roof of the Hospital.

Boston EMS has been notified of the hospital closure date and the need to relocate the radio communication equipment on the roof by September 30, 2024. Corporate Real Estate and Facilities toured the roof on August 20, 2024, to determine future location and infrastructure needs if moved. The Chief has also been given the contact information for the property owners legal counsel in the event they want to pursue an agreement to remain onsite.

- d. The Department requested information on plans to arrange for an ambulance to remain on standby at the hospital, after closure, and to be available to transport walk-in patients to an appropriate ED.

Carney Hospital will have an ambulance on site and on standby effective Saturday August 31, 2024, at 7 am and will remain for 48-72 hours.

6. **Additional Directive 3:** The Department requested timelines for the signing of agreements with other area providers for new or expanded services after the closure of the Hospital.

Many of the services are remaining in their current location in the Seton Medical Office Building. Any services relocating to the Seton Medical Office Building will complete lease documents prior to August 27, 2024, and will relocate August 28-29, 2024.

7. **Additional Directive 4:** The Department requested additional information concerning the transfer and monitoring of geriatric psychiatric patients and Steward's system-wide capacity to meet the needs of geriatric psychiatric patients.

Good Samaritan Leadership, Corporate Real Estate and Facilities and two representatives from the MA Department of Mental Health (DMH) toured the Good Samaritan Geriatric Psychiatry Unit on Monday August 19<sup>th</sup>, 2024. A report from MA DMH is forth coming. Any environmental issues identified in the report will be mitigated and a corrective action plan and licensure application will be submitted to DMH for consideration of re-licensure.

8. **Additional Directive 6:** The Department requested additional information regarding language services, including at private physician offices.

Hospital	Languages	Hours
Beth Israel Milton	140 languages – ASL	24 hours a day, 365 days a year
Boston Medical Center	More than 150 languages – ASL	24 hours a day, 365 days a year
St. Elizabeth's Medical Center	200 languages- ASL	24 hours a day, 365 days a year

All Steward Medical Group providers have an interpreter services program to assist patients during their appointments. This telephonic service is available 24/7. Some of our practices also offer video interpreter availability. We are unable to provide information regarding resource availability in private practices.

9. **Additional Directive 7:** The Department requested an updated communication plan and telephone number for the patient assistance telephone line.

We have re-defined the hours of operation for the Patient Assistance Line to accommodate those patients who work during the day. The hours of operation will be Monday- Friday 7am-7pm the contact number is 617-789-2228. Information on the Patient Assistance phone line will be posted on the hospital websites. It will include the following information:

- Phone number: (617) 789-2228
- Staffed 7am to 7pm Monday through Friday
- Call with your questions including:
  - Rescheduling procedures
  - Pending results

- Referrals to providers/specialists
- Payment/billing questions
- Open legal issues
- Finding loved ones who were inpatients
- Lost and found

The line will open August 26, 2024, at 7:00 AM and will be available for a minimum of 30 days and may be extended based on volume of calls. When the call volume is sustained at 2-4 calls per day we will re-evaluate the hours and continued operation

**10. Additional Directive 9:** The Department requested specific data on Hospital employees that have been offered employment with other Steward facilities to date.

Bargaining with all unions who represent members at these two (2) hospitals continues During this ongoing bargaining, we have agreed to begin the bid process with 119SEIU on Thursday, August 22, 2024. We have not yet determined a date with MNA, ATC and UFSPSO, but expect signed closure agreements imminently which will inform the bid process. The hospital will also be hosting a job fair Friday August 23, 2024, open to all employees impacted by the hospital closure.

To date we have 6 non-union employees that have accepted positions at other Steward facilities in the state.

**11. Additional Directive 10:**

- a. The Department requested information regarding all facility and clinical staff being retained post closure, including the number of staff, their titles and anticipated employment end date.

Carney Hospital will retain the following staff below until the building is fully decommissioned.

<i>Department</i>	<i>Total # of Staff</i>	<i>Staff Title/Role</i>	<i>Estimated End Date</i>
Leadership	2	CEO, CNO	September 30, 2024
Laboratory	2	Manager and Technician	September 15, 2024
Pharmacy	2	Manager and Technician	September 15, 2024
Radiology	2	Manager and FX Masse (vendor)	September 15, 2024
Nutrition Services	3	Manager and 2 Kitchen Staff	September 5, 2024
Security (24/7 coverage)	2	Security Officers- 1 stationed in ED (8/31/24-9/2/24 12pm) and 1 on patrol	October 15, 2024 (or until handoff to landlord)
Medical Records	2	Manager and Vendor	September 30, 2024
Materials Management/Mail Room	3	Director of Materials, 1 Materials Staff, and 1 Mailroom Staff	September 30, 2024
Facilities	6	Facility Director, 4 Mechanics, Grounds Keeper. CREF	September 30, 2024
Boiler Plant	4	Boiler Plant Operators 24/7 (4.2 FTE total)	September 30, 2024
Human Resources	1	HR Advisor	September 30, 2024
Environmental Services	4	Manager, and 3 Environmental Services Staff	September 15, 2024
Biomedical Engineering	1	CREF	September 30, 2024

- b. The Department requested additional information on what steps will be taken to provide transportation for patients who show up at the Hospital post closure.

Carney Hospital will have an ambulance on site and on standby effective Saturday August 31, 2024, at 7am and will remain for 48-72 hours.

Steward Health Care does not have the capacity as a company to provide any ongoing assistance with transportation once the hospital has ceased operations.

- c. The Department requested additional information detailing safety and security inclusive of the full Hospital property including structures such as the parking garage.

Public Safety and Security will be onsite, 24/7, to ensure the facility is secure and all doors are locked and no unauthorized persons are in the building and the building is free of trespassers. Security will be rounding the building interior and exterior continuously, including grounds and parking garage. This rounding will be documented. They will ensure that all utilities are in working order, that all egress paths remain free and clear and that there are no fire and floods. Any unusual observations will be properly called into the local AHJ depending on the circumstance whether that be Police, Fire, or EMS.

- d. The Department requested additional information on steps the Hospital will take if there is further delay in the identification of a relocation site for the Chempack, including identifying the pharmacist who will be responsible for the container in the event that it cannot be removed from the Hospital until after the Hospital's closure date.

The Chempack located at Carney Hospital was temporarily relocated to St. Elizabeth's Medical Center on Wednesday August 21, 2024. The State assisted with the relocation and will continue to work with St. Elizabeth's on a final disposition.

12. **Additional Directive 12b:** Department requested additional information on what will be done to accommodate patients who work during the day and cannot call within those hours and what volume of calls would justify discontinuing the Patient Assistance Line prior to 60 days after the closure.

We have re-defined the hours of operation for the Patient Assistance Line to accommodate those patients who work during the week. The hours of operation will be Monday- Friday 7am-7pm the contact number is 617-789-2228. Information on the Patient Assistance phone line will be posted on the hospital websites. It will include the following information:

- Phone number: (617) 789-2228
- Staffed 7am to 7pm Monday through Friday
- Call with your questions including:
  - Rescheduling procedures
  - Pending results
  - Referrals to providers/specialists
  - Payment/billing questions
  - Open legal issues
  - Finding loved ones who were inpatients
  - Lost and found

The line will be open starting August 26, 2024, at 7:00 AM and will be available for a minimum of 30 days and may be extended based on volume of calls. When the call volume is sustained at 2-4 calls per day we will re-evaluate the hours and continued operation.

13. **Additional Directive 13c:** The Department requested the name and contact information of the Medical Record Vendor that will contract with Steward to handle medical records.

The medical record vendor is Healthcare Data Management Solutions – MRO Corp.  
 Corporate Headquarters  
 1000 Madison Ave. Suite 100  
 Norristown, PA 19403  
 (610) 994-7500

14. **Special Directive 14d:** The Department requested additional detail regarding Fresenius will communicate with its dialysis patients and a plan if services cannot be continued, including identification of other alternative providers.

Fresenius is a private company renting space in Carney Hospital and only provides dialysis services to outpatients in the community. Fresenius does not provide dialysis services to hospital inpatients. Fresenius is communicating all relocation information to their patients. The Hospital does not have the ability to direct Fresenius regarding these communications.

15. **Special Directive 15a:** The Department requested an updated transportation plan that describes the assessment mechanism, including hospital point of contact and communication to each specific patient.

The transportation needs are assessed on each patient at the time of admission through multiple assessments. This information is used as part of the multidisciplinary discharge plan. This information is also available in the electronic medical record (EMR) to the outpatient providers. Nursing completes Health Related Social Needs (HRSN) Assessment on admission. The most recent data, January 1, 2024 – current reveals very few patients (3.5% of patients) identify transportation as a barrier to healthcare.

Steward Health Care does not have the capacity as a company to provide any ongoing assistance with transportation needs other than the vouchers that will be made available once the hospital has ceased operations.

16. **Special Directive 16:** The Department requested specific information including more detailed information about who the Hospital is working with as a designated storage vendor and point of contact for employee files.

The hospital continues to work on securing a vendor to for the storage of employee files Until a vendor is secured St. Elizabeth's Medical Center will be the custodian of all Carney Hospital human resources files.

17. **Special Directive 17:** The Department requested specific staffing information, including the number of staff, their titles and anticipated employment end date for the staff that will continue to work in the pharmacy post Hospital closure to ensure the safe and complete wrap up of all pharmacy operations. This must include specific end dates for employment to ensure all pharmacy activity is complete.

A Pharmacy Manager and Pharmacy Technician will remain in the hospital until September 15, 2024.