



Steward Health Care System LLC North Division

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 Nashoba Valley Medical Center (Nashoba Valley 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 Medical Office Building (MOB). The Department has indicated that it is specifically interested in those services that would no longer be available and requested that we communicate with alternative providers to obtain information on wait times.

Nashoba Valley identified Health Alliance Clinton Hospital, St. Joseph's Hospital, and Emerson Hospital as alternative sites for care in the community. Below is a list of the services that the hospitals provide. These hospitals provide the similar and, in some cases, even more comprehensive specialties.

Hospital	Available Services
HealthAlliance Clinton Hospital, Leominster campus 14.9 miles <ul style="list-style-type: none">Off peak travel time: 21 minutesPeak travel time: 27 minutes	Emergency Medicine, Diagnostic Imaging, Diabetes and Endocrinology, Laboratory Services, Orthopedics, Physical Therapy, Cancer Care, Women's Health, Medicine, and Medical Specialties
St. Joseph Hospital 15.5. miles <ul style="list-style-type: none">Off peak travel time: 29 minutesPeak travel time: 35 minutes	Cancer Care, Cardiac Services, Diagnostic Imaging, Emergency Services, Endocrinology, Laboratory Services, Neurology, Neurosurgery, Occupational Health, Orthopedics, Outpatient Rehab, Palliative Care, Pediatric Care, Podiatry, Pulmonary Medicine, Rheumatology, Neurodiagnostic and Sleep Services
Emerson Hospital 17 miles <ul style="list-style-type: none">Off peak travel time: 25 minutesPeak travel time: 40 minutes	Allergy & Immunology, Anticoagulation Center, Behavioral Health, Bone & Joint, Critical Care, Concussion Care, Dermatology, Diabetes, ENT, Emergency Medicine, Ophthalmology, GYN, Cardiology, Home Care, Radiology, Lab Services, MCH, Neurology & Neurosurgery, Occupational Health, OT, Pain, Integral Medicine & Primary Care, Palliative Care, Pathology, Pediatrics, Psychiatry, Plastic Surgery, Sleep Center, Speech & Language Pathology, Sports Medicine, Urgent Care, Urology, Vascular Surgery, Surgery, Women's Health, & Wound Care Hyperbaric Center
Lowell General Hospital 16 miles <ul style="list-style-type: none">Off peak travel time: 36 minutesPeak travel time: 45 minutes	Cancer Care, Cardiac Services, Cardiac Surgery, Diagnostic Imaging, Endocrinology, ENT, Gastroenterology, Gynecology, Infectious Disease, Orthopedics, Kidney Care, Maternity, Neurology, Ophthalmology, Pediatrics, Pain Services, Podiatry, Physical Therapy, OT, Pulmonology, Radiation Oncology, Stroke, Substance Use Disorder, Transplant Surgery, Trauma Surgery, Urology, Vascular Surgery, Wound Care

The following outpatient services will not be available at Nashoba Valley Medical Center Medical Office Building; however, they are available at the alternative sites. A capacity assessment was conducted at the alternative sites for the next available 3rd appointment- see below:

3rd Next Appointment			
Specialty	Clinton Health Alliance	HFH	Emerson
MRI	Aug 26/2024	Sep 03.2024	Sept 27.2024
	Shields800 258 4674	978 722 3800	Shields 978 287 3700
CT	Sept 09.2024	October 14,2025	Sept 05.2024
	978 466 2000	978 722 3800	978 287 3700
Plain Film	walk in 7-7pm 7 days	walk in 8-4 m-f	walk in m-sat
	978 466 2000	978 722 3800	978 287 3700
Endocrine	Mar-25	Nov 10.2025	Called left VM x4
	978-466-2778	Dr. Raven	978 287 8520
Sleep	Jan, 19,2025	Sept 09,2024	Called left VM x4
	978-466-2778	978-687-0151	617 796 7766
Pain	Dec 10.2024	Sept 16,2024	Called left VM x4
	978 466 4600	978 369 1400 ext 2768	978 369 1400
EMG	Jan 06.2025	Sept 12,2024	Nov 15,2024
	978 466 2411	978-687-0151	978 287 3003

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 to meet 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, January 1, 2024, reveals that very few Nashoba Valley patients (3.3 % 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 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 the 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. Holy Family Hospital will continue to provide ongoing services to any inpatients requiring continued care at the time of Nashoba Valley Medical Center closure.

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.

See Appendix A

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 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 an assessment of specific run time changes resulting from the closure of the hospital including and a plan to mitigate the increased run times due to the 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.

Additionally, the Department requested the following:

- a. With the cessation of primary stroke services on August 16, 2024, the Hospital must communicate this change through CMED as an unavailable service notification.

On August 16, 2024, Nashoba Valley Medical Center stopped inpatient admissions for the stroke services. Nashoba Valley Medical Center 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 as 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 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.

Nashoba Valley Medical Center will have an ambulance on site and on standby effective Saturday August 31, 2024, at 7 am and will remain for 48 hours. We continue to work with local EMS to provide extended coverage.

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.

The Nephrology Service is relocating to the Medical Office Building and 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 19th, 2024. A report from MA DMH is forth coming. Any environmental issues identified in the report will be mitigated, a corrective action plan implemented, and licensure application will be submitted to DMH for consideration of re-licensure.

8. **Additional Directive 5:** The Department requested additional information detailing what public transportation resources are available and what additional resources will be provided by Steward Health Care and for how long.

We have communicated with the owner of “Here to There” Transport LLC confirming this service is available to transport patients to and from medical appointments 7 days a week. Steward Health Care does not have the capacity as a company to provide any ongoing assistance with transportation vouchers once the hospital has ceased operations.

9. **Additional Directive 6:** The Department requested additional information regarding language services, including how language services will be handled in the event of outpatient referrals to private physician offices.

Hospital	Languages	Hours
HealthAlliance Clinton Hospital, Leominster campus	More than 100 languages – ASL	24 hours a day, 365 days a year
St. Joseph Hospital	More than 240 languages – ASL	24 hours a day, 365 days a year
Emerson Hospital	More than 160 languages- ASL	24 hours a day, 365 days a year
Lowell General Hospital	More than 240 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.

10. **Additional Directive 7:** The Department requested an updated communication plan for patients, including information detailing the patient assistance line referenced.

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 per day, we will re-evaluate the hours and continued operation.

- 11. 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 2 non-union employees that have accepted positions at other Steward facilities in the state.

12. Additional Directive 10:

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

Nashoba Valley Medical Center 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	7	Director , 3 Pharmacists and 3 Technicians	September 15, 2024
Radiology	2	Manager and FX Masse (vender)	September 15, 2024
Nutrition Services	3	Manager and 2 Kitchen Staff	September 5, 2024
Security (24/7 coverage)	2	Security Officers	October 15, 2024 (or until handoff to landlord)
Medical Records	3	Director of HIM and 2 Staff	September 30, 2024
Materials Management/ Mail Room	1	Director of Materials	September 30, 2024
Facilities	4	Facility Coordinator, HVAC Mechanic, Electrician Mechanic, and Mechanic	September 30, 2024
Human Resources	1	HR Advisor	September 30, 2024
Environmental Services	4	Manager, and 3 Environmental Services Staff	September 15, 2024

- b.** The Department requested additional details on patient communication and transport post September 1, 2024. The Department requests additional information on what steps will be taken to provide transportation for patients who show up at the Hospital post closure.

Nashoba Valley Medical Center will have an ambulance on site and on standby effective Saturday August 31, 2024, at 8am and will remain for 48 hours. We continue to work with local EMS to provide extended coverage.

- 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 areas. 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.

13. **Additional Directive 12b:** The Department requested additional information on what will be done to accommodate patients who work during the day and cannot call within those hours,

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 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 per day, we will re-evaluate the hours and continued operation.

14. **Additional Directive 13c:** The Department requested the name, contact information, and communication plan for 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

15. **Special Directive 14d:** The Department requested additional information regarding the specific date that the Hospital will stop providing dialysis services to FMC Devens patients and provide specific plan to meet the needs of these patient post closure.

The last FMC patient was treated on 7/17/24. FMC Devens was notified of the closure and were provided an option to work with Holy Family Hospital. They have declined and are in communications with other local facilities.

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

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, January 1, 2024, reveals that very few Nashoba Valley patients (3.3 % of patients) identify transportation as a barrier to healthcare.

17. **Special Directive 16:** The Department requested specific information including 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 Holy Family Hospital will the custodian of all Nashoba Valley Medical Center human resources files.

18. **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.