



The Commonwealth of Massachusetts
Executive Office of Health and Human Services
Department of Public Health
250 Washington Street, Boston, MA 02108-4619

MAURA T. HEALEY
Governor

KIMBERLEY DRISCOLL
Lieutenant Governor

KATHLEEN E. WALSH
Secretary

ROBERT GOLDSTEIN, MD, PhD
Commissioner

Tel: 617-624-6000
www.mass.gov/dph

May 6, 2024

Crystal Bloom, Partner
Husch Blackwell LLP
One Beacon Street, Suite 1320
Boston, MA 02108-3106

VIA electronic mail: Crystal.Bloom@huschblackwell.com

RE: Notice of Transfer of Site Request at Sturdy Memorial Hospital # **SMH-24031214-TS**

Dear Attorney Bloom,

We are in receipt of the above-referenced Notice and its accompanying attachments, dated April 10, 2024, wherein Sturdy Memorial Hospital ("Sturdy") provided notice to the Department of Public Health ("the Department") in accordance with 105 CMR 100.745 for a proposed Transfer of Site of one outpatient procedure room from a satellite location, the Mansfield Health Center, 200 Copeland Drive, Mansfield, MA, to the main campus of Sturdy Memorial Hospital, 211 Park Street Attleborough, MA as described below.

Reason for Request

The Proposed Transfer is being sought to maintain timely access to outpatient pain management services for the Applicant's Patient Panel in Sturdy's newly constructed pain management service ("Service"). The building which will house the Service is expected to open for patient care Summer 2025.

In compliance with the requirements set forth at 105 C.M.R. 100.745(D) the Applicant provided the following information relative to the transfer of site request:

1. Gross Square Feet ("GSF").
 - The current procedure room at the Satellite is 100 GSF.
 - The proposed procedure room to be located at Sturdy will be 244 GSF.

- The Procedure Room/OR in the transferred site will be 1.44% larger than the one at the satellite.

2. Primary Service Area (“PSA”) Towns Served

- The Primary Service Area towns served by Sturdy are Attleboro, North Attleboro, Norton, Mansfield, and Plainville.
- The Primary Service Area towns served by the Satellite are Attleboro, North Attleboro, Norton, Mansfield, Taunton
- The towns in the PSA are the same except for the last two, Plainville and Taunton.

3. Patient Population Demographics.

The table below provides the demographic data for the FY2023 patient populations served by the procedure room in Mansfield that Sturdy seeks to transfer and by the existing pain management clinic located at Sturdy’s main campus. There is little variation among the two sites except between the gender cohort by site.

Demographic Profile	Satellite	%	Existing Pain Management Service at the Hospital	%
Age				
0-18	-		<11	
19-45	386	16.1%	249	13.7%
46 - 65	999	41.6%	776	42.8%
65+	1,015	42.3%	787	43.4%
Gender				
Male	664	27.7%	737	40.7%
Female	1,736	72.3%	1,075	59.3%
Race				
Black or African American	56	2.3%	49	2.7%
Other	35	1.5%	13	0.7%
Asian/Asian Indian	43	1.8%	28	1.5%
White	2,266	94.4%	1,721	95.0%
Total	2,400	100.0%	1,812	100.0%

4. Patient Access

By relocating the Hospital’s “right to operate” the procedure room from the Satellite to the Hospital, for the provision of pain management services, the service will improve timely access to pain management services for its Patient Panel and the Service Area Population providing quicker pain relief and increased patient satisfaction. The current wait times are 3-4 weeks. The Hospital currently has one procedure room to provide


patients with pain management services. The second procedure room at the Hospital will allow Sturdy to better manage wait times by reducing the amount of time between cases as a result of cleaning and turnover. This more efficient use of clinical staffing is expected to reduce patient wait times, in turn allowing a modest increase in overall procedure volume and patients served.¹

5. Impact on Price - There will be no change in contracts or in payor reimbursement for the pain management services provided at Sturdy as a result of the Proposed Transfer of Site.
6. Sturdy asserts that the transfer of the right to operate one procedure room will have neutral or positive impact on TME because, the existing procedure room at the Mansfield satellite will be converted to a physician practice, and as such reimbursement will decrease by approximately 14%. This will counterbalance the small increases associated with the new room which as described in #4 above will use resources more efficiently.

FINDINGS

The Department finds that Sturdy has provided the Department with the information required in 105 CMR 100.745(D). Based on a review of the Notice and supporting materials, the Department finds that this transaction does not require a DoN either as a Substantial Capital Expenditure or Substantial Change in Service, pursuant to 105 CMR 100.715, and that Sturdy may move forward with the proposed changes at the designated locations.

Sincerely,


Robert Goldstein, MD, PhD
Commissioner, Massachusetts Department of Public Health

¹ The procedure room at the Satellite is currently used for rheumatology procedures. Upon relocation of the "right to operate" the procedure room, patients will continue to have access to rheumatology procedures in Mansfield; the existing space will be occupied by a physician practice that will provide the same rheumatology procedures and the space will be transitioned off Sturdy's hospital's license.