



The Commonwealth of Massachusetts  
Executive Office of Health and Human Services  
Department of Public Health  
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DATE: May 21, 2025

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VIA electronic mail: [lwinn@anknerlevy.com](mailto:lwinn@anknerlevy.com)

RE: Notice of Transfer of Site Application #MWMC-25040109-TS

Dear Attorney Winn,

We are in receipt of the above-referenced Notice and its accompanying attachments, dated April 2, 2025, wherein VHS Acquisition Subsidiary Number 9, Inc., d/b/a MetroWest Medical Center ("Applicant" or "MWMC") provided notice to the Department of Public Health ("the Department") in accordance with 105 CMR 100.745 for a proposed transfer of site ("Proposed Transfer") of outpatient services, including one computed tomography ("CT") machine from MetroWest Health & Wellness Center (the "Center"), a hospital satellite located at 761 Worcester Road, Framingham, MA, to two separate MWMC licensed facilities: 1) Framingham Union Campus ("Framingham Union"), a MWMC hospital campus located at 115 Lincoln Street, Framingham, MA and 2) MetroWest Medical Center Outpatient Primary Care ("OPC"), a MWMC hospital satellite located at 61 Lincoln Street, Framingham, MA, as described below.

The proposed transfer of site involves the relocation of outpatient services, including CT services, in order to maintain access to these services for the Applicant's patient population and to improve the efficiency of services, and care coordination for patients.

**Reason for Request**

MWMC has 239 licensed beds and operates two hospital campuses: Framingham Union (136 licensed beds) in Framingham, MA and Leonard Morse Campus (103 licensed beds) in Natick, MA. Framingham Union is the subject of this Transfer of Site application. MWMC also operates two hospital satellites providing outpatient services: the Center in Framingham, MA and OPC, also in Framingham, MA. MWMC has 3 CT machines: 1 CT machine is located at the Center, and the other 2 CT machines are located at Framingham Union.

The Applicant states that its lease for the Center has become cost-prohibitive. The current lease is ending and the Applicant has decided to close the Center. The Applicant plans to consolidate services at the two proposed sites, located approximately 2 miles from the Center and 0.2 miles

from each other, to provide patients with improved access to comprehensive and coordinated care. The Applicant affirms that it will maintain all outpatient services and that all outpatient services will transfer without interruption to the patient population served. After all outpatient services are relocated, the Applicant states that the Center will close. The Applicant anticipates a closing date on or around July 31, 2025.

The Center currently provides mammography, breast ultrasound, X-ray, bone density, physical therapy, occupational therapy, and speech therapy services and has one CT machine. The Applicant is proposing to relocate these outpatient services to Framingham Union and to OPC, as described below in Table 1.

**Table 1: Proposed Transfer of Outpatient Services**

<b>Current Site:</b>	<b>Proposed Sites:</b>	
The Center	OPC	Framingham Union
<ul style="list-style-type: none"> <li>• Mammography</li> <li>• Breast ultrasound</li> <li>• X-ray</li> <li>• Bone density</li> <li>• Physical therapy</li> <li>• Occupational therapy</li> <li>• Speech therapy services</li> <li>• 1-128-slice CT machine</li> </ul>	<ul style="list-style-type: none"> <li>• Mammography</li> <li>• Breast ultrasound</li> <li>• Bone density</li> </ul>	<ul style="list-style-type: none"> <li>• X-ray</li> <li>• Physical therapy</li> <li>• Occupational therapy</li> <li>• Speech therapy</li> <li>• 1-128-slice CT machine</li> </ul>

The Center currently has one 128-slice CT machine that has been non-operational since June 2023 due to staffing challenges. As a result, the Applicant states that it has prioritized the provision of CT services for both inpatients and outpatients at Framingham Union, which currently has 2 CT machines: one 64-slice CT machine and one 128-slice CT machine. The Applicant is proposing to 1) transfer the site of the Center's 128-slice CT machine to Framingham Union, to replace Framingham Union's current 64-slice CT machine (1:1 replacement), and 2) decommission the Framingham Union's existing 64-slice CT machine. If the Proposed Transfer is approved, the number of CT machines at Framingham Union will not change. The Applicant maintains that replacing the 64-slice CT machine at Framingham Union with the Center's 128-slice CT machine will improve efficiency of CT scans.

The Applicant provided an overview of the current location of the services involved in the Proposed Transfer and the location of the services if the Proposed Transfer is approved. This is shown in Table 2. Rehabilitation services refer to physical therapy, occupational therapy, and speech therapy services.

**Table 2: Site Descriptions**

<b>Current Site:</b>	<b>Proposed Sites:</b>
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The Center	OPC	Framingham Union
<ul style="list-style-type: none"> <li>• <b>Imaging, mammography and breast ultrasound services</b> are located on the 3<sup>rd</sup> floor, with 6 exam rooms, 3 administrative offices, and supporting waiting areas.</li> <li>• <b>Bone density services</b> are located on the 3<sup>rd</sup> floor.</li> <li>• <b>X-ray services</b> are located on the ground floor. Bone density services and X-ray services are managed by the same technologist, requiring frequent movement between floors, which can lead to delays.</li> <li>• <b>Rehabilitation services</b> are located on the 1<sup>st</sup> floor. The space consists of 8 physical therapy bays, 1 occupational therapy room, and a private area for speech therapy sessions.</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Mammography, breast ultrasound and bone density services</b> will be offered.</li> <li>• The location includes 14 total rooms, including 10 exam rooms and 4 administrative offices.</li> <li>• The layout will improve service workflow.</li> </ul>	<ul style="list-style-type: none"> <li>• <b>X-ray</b> will be located in 2 rooms adjacent to each other, separated by a centralized technologist workroom, eliminating the need for technologists to move between different floors.</li> <li>• <b>Rehabilitation services</b> will be located in space which includes 6 physical therapy bays on the ground floor, and 2 dedicated occupational therapy rooms and 2 private speech therapy rooms on the 2<sup>nd</sup> floor.</li> <li>• Designated workspace for therapists and staff will improve care coordination.</li> </ul>

Table 3 shows the gross square footage (GSF) of the current and proposed sites.

**Table 3: GSF, Current and Proposed Sites**

Current Site:	Proposed Sites:	
The Center	OPC	Framingham Union
11,200 GSF for 8 Outpatient Services	4,348 GSF for 3 Outpatient Services: mammography, breast ultrasound, bone density	4,020 GSF for 5 Outpatient Services: physical, occupational, and speech therapy, X-ray, CT

The Applicant provided detailed patient demographic information of patients of the Center, Framingham Union, and OPC for fiscal year (FY) 2023 for each outpatient service involved in the Proposed Transfer. FY2023 is the most recent year for which demographic data are available. The Applicant states that in some cases, totals for demographic categories do not equal the total number of patients because: 1) some insurance information does not consistently pull through in the data, 2) insurance and ethnicity details may be incomplete if not properly documented at the point of entry, and 3) the information is collected across multiple systems and compiled on the back end which can lead to gaps in the data.

Table 4 shows primary service area (PSA) information, Table 5 shows total number of unique patients and Table 6 shows payer mix data for the current and proposed sites. To protect patient confidentiality, categories with less than 11 patients have been counted in another related category and noted with “<11”.

**Table 4: PSA (Cities/Towns)**

<b>Current Site:</b>	<b>Proposed Sites:</b>	
The Center (% of Center patients)	OPC	Framingham Union
<ul style="list-style-type: none"> <li>• Framingham: 69%</li> <li>• Natick: 17%</li> <li>• Ashland: 5%</li> <li>• Marlborough: 4%</li> <li>• Southborough: 2%</li> <li>• Other: 3%</li> </ul>	No anticipated change in current PSA	No anticipated change in current PSA

**Table 5: Total Number of Unique Patients**

	<b>Mammography</b>	<b>Breast Ultrasound</b>	<b>X-Ray</b>	<b>Bone Density</b>	<b>Physical Therapy</b>	<b>Occupational Therapy</b>	<b>Speech Therapy</b>	<b>CT</b>
The Center	11,297	1,373	583	1,075	2,457	488	<11	0
OPC	0	0	0	0	0	0	0	0
Framingham Union	11	118	3,838	0	0	0	0	4,730

**Table 6: Payer Mix<sup>1, 2</sup>**

<b>Mammography</b>	<b>The Center</b>	<b>OPC</b>	<b>Framingham Union</b>
Commercial/Other	53	0	0
Managed Care HMO/POS/PPO	5,088	0	0
Mass Health	888	0	<11
Managed Medicaid	537	0	0
Commercial Medicare	1,695	0	0
Medicare Fee For Service	122	0	<11
Free Care/Health Safety Net	69	0	0
Total	8,452	0	N/A
<b>Breast Ultrasound</b>	<b>The Center</b>	<b>OPC</b>	<b>Framingham Union</b>
Commercial/Other	<11	0	<11
Managed Care HMO/POS/PPO	564	0	81
Mass Health	215	0	37
Managed Medicaid	108	0	<11
Commercial Medicare	153	0	<11
Medicare Fee For Service	179	0	<11
Free Care/Health Safety Net	14	0	0
Total	1,233	0	118
<b>X-Ray</b>	<b>The Center</b>	<b>OPC</b>	<b>Framingham Union</b>
Commercial/Other	<11	0	114
Managed Care HMO/POS/PPO	258	0	1,188

<sup>1</sup> The category “Other” includes Autoworkers, Indemnity insurance, and Workers' Compensation.

<sup>2</sup> Because data provided was not complete or was inconsistent, percentages were not calculated.

Mass Health	15	0	673
Managed Medicaid	42	0	282
Commercial Medicare	82	0	574
Medicare Fee For Service	117	0	749
Free Care/Health Safety Net	0	0	29
Total	514	0	3,609
<b>Bone Density</b>	<b>The Center</b>	<b>OPC</b>	<b>Framingham Union</b>
Commercial/Other	<11	0	0
Managed Care HMO/POS/PPO	298	0	0
Mass Health	32	0	0
Managed Medicaid	23	0	0
Commercial Medicare	23	0	0
Medicare Fee For Service	393	0	0
Free Care/Health Safety Net	<11	0	0
Total	774	0	0
<b>Physical Therapy</b>	<b>The Center</b>	<b>OPC</b>	<b>Framingham Union</b>
Commercial/Other	98	0	0
Managed Care HMO/POS/PPO	523	0	0
Mass Health	464	0	0
Managed Medicaid	251	0	0
Commercial Medicare	251	0	0
Medicare Fee For Service	522	0	0
Free Care/Health Safety Net	22	0	0
Total	2,131	0	0
<b>Occupational Therapy</b>	<b>The Center</b>	<b>OPC</b>	<b>Framingham Union</b>
Commercial/Other	13	0	0
Managed Care HMO/POS/PPO	209	0	0
Mass Health	49	0	0
Managed Medicaid	47	0	0
Commercial Medicare	47	0	0
Medicare Fee For Service	78	0	0
Free Care/Health Safety Net	0	0	0
Total	443	0	0
<b>Speech Therapy</b>	<b>The Center</b>	<b>OPC</b>	<b>Framingham Union</b>
Commercial/Other	0	0	0
Managed Care HMO/POS/PPO	<11	0	0
Mass Health	0	0	0
Managed Medicaid	0	0	0
Commercial Medicare	0	0	0
Medicare Fee For Service	0	0	0
Free Care/Health Safety Net	0	0	0
Total	N/A	0	0
<b>Computed Tomography</b>	<b>The Center</b>	<b>OPC</b>	<b>Framingham Union</b>
Commercial/Other	0	0	45
Managed Care HMO/POS/PPO	0	0	1,167
Mass Health	0	0	412
Managed Medicaid	0	0	292
Commercial Medicare	0	0	741
Medicare Fee For Service	0	0	986
Free Care/Health Safety Net	0	0	32
Total	0	0	3,675

## Patient Access

The Center is approximately a 2.0 mile drive from both OPC and Framingham Union. The Applicant states that through the Proposed Transfer, services will be consolidated to two locations in close proximity (0.2 miles apart), instead of three locations, which will foster collaboration between clinical teams, will enhance communication and the sharing of resources across departments, and will improve patient experience. The Applicant affirms that integrating access to imaging, therapy and diagnostic services at Framingham Union will support the provision of multiple services in a single location, and this will save patients time commuting to multiple appointments, and will help to reduce delays between appointments. The Applicant also notes that both proposed sites are equipped with modern infrastructure that will improve patient access to services: Framingham Union has more dedicated private rooms, and OPC has greater square footage and additional exam rooms dedicated to mammography, breast ultrasound, and bone density services.

The Applicant states that the Proposed Transfer will improve accessibility of outpatient services through the use of public transportation. The Applicant outlined transportation options available to the patient population served, as shown in Table 7.

**Table 7: Access to Transportation**

Proposed Sites:	
OPC	Framingham Union
<ul style="list-style-type: none"><li>• <b>Public Transportation:</b> Accessible via the MetroWest Regional Transit Authority (MWRTA) Bus Route 7, which stops 0.2 miles from 61 Lincoln Street.</li><li>• <b>Commuter Rail:</b> The Framingham MBTA Station, located approximately 0.8 miles from the OPC location, serves the Framingham/Worcester Commuter Rail Line, offering access from surrounding towns including Natick, Ashland, and Southborough.</li><li>• <b>Parking:</b> Ample on-site parking is available for free to all patients, including spaces that are compliant with the requirements in the American with Disabilities Act (ADA).</li></ul>	<ul style="list-style-type: none"><li>• <b>Public Transportation:</b> Accessible via MWRTA Bus Route 7, which stops 0.1 miles from the entrance of the main campus of Framingham Union.</li><li>• <b>Commuter Rail:</b> The Framingham MBTA Station, located approximately 0.8 miles from Framingham Union, serves the Framingham/Worcester Commuter Rail Line, offering access from surrounding towns including Natick, Ashland, and Southborough.</li><li>• <b>Parking:</b> Ample on-site parking is available for free to all patients, including spaces that are compliant with the requirements in the ADA.</li></ul>

## Documentation of Sufficient Interest in the Proposed Site

The Applicant states that MWMC owns the properties at both Framingham Union campus and OPC, and that in each case, the area is appropriately zoned to provide healthcare services, per each facility's current licensure by the Department.

## Impact on Health Care Spending


The Applicant states the Proposed Transfer does not require a capital expenditure. Additionally, the Proposed Transfer will result in a one-time operating cost of approximately \$137,600. This one-time cost will encompass a refresh of the new service areas (e.g., repainting), the relocation of equipment, such as imaging devices and therapy equipment, and legal fees. The Applicant states that it does not anticipate any change in service prices or reimbursement rates due to the Proposed Transfer and affirms that all pricing will remain consistent with current charges for all outpatient services upon implementation of the Proposed Transfer. The Applicant states that it does not plan to increase or change any costs for patients as part of the transition from the Center, a hospital satellite, to Framingham Union, a hospital campus. The Applicant affirmed that its goal is to maintain continuity of care and ensure that services remain accessible and affordable to the community during and after implementation of the Proposed Transfer.

The Applicant states that it anticipates minor increases in utility and maintenance expenses at the proposed locations that will be simultaneously offset by reductions in lease and property tax costs from closing the Center. The Applicant also states that staffing costs will remain stable and no additional staff will be required due to redistribution of existing personnel.

### **Findings:**

The Department finds that VHS Acquisition Subsidiary Number 9, Inc., d/b/a MetroWest Medical Center (“Applicant” or “MWMC”) has provided the Department with the information required in 105 CMR 100.745(D). Based upon 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 MWMC may move forward with the proposed changes in the designated locations.

Sincerely,

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