



## Norwood Hospital TRANSITION AND CLOSURE PLAN September 25, 2024

The document serves to inform the Massachusetts Department of Public Health of Steward Healthcare's transition plan for the proposed closure of the Steward Norwood Hospital, Inc (the "hospital") licensed satellites. The Norwood Hospital inpatient operations, located at 800 Washington Street, Norwood MA 02062 ceased to operate following a flood in June 2020. The operations at the satellites will be phased down with planned closure date of October 31, 2024. The licensed satellites are:

- Norwood Hospital Cancer Center at Foxboro, 70 Walnut Street, Foxboro MA.
- Foxboro, 70 Walnut Street, Foxboro, MA.
- Guild Imaging Center of Norwood Hospital, 825 Washington St. Ste 170 & 210, Norwood MA.
- Norwood Performance Therapy, 1343 Providence Highway, Norwood MA.

Due to the continued financial issues, and the lack of a viable buyer Steward Healthcare is no longer able to continue to operate the licensed satellites at Norwood Hospital. Due to the hospital **closure** 4 years ago and the limited services provided, credit issues, and the ongoing need for capital expenditures and repairs to the physical plant and equipment, it has become financially impossible to continue these operations. In addition, DPH has not extended the Determination of Need approval, needed for the reconstruction of the inpatient hospital building. Consequently, the hospital's license cannot be renewed and will expire on November 5, 2024.

A public hearing, scheduled by the MA Department of Public Health, will be held on October 21, 2024, at 6:00 PM at the Four Points by Sheraton, Norwood MA, and a virtual hearing will be conducted on October 22, 2024, at 6:00 PM.

Prior to the closure, all current patients will receive options for alternative sites for care, and information to access their medical records.

### **Services provided at Foxboro**

The following services are provided at the Foxboro location: Hematology/Oncology, Radiation Oncology, CT scan, and Radiology. Detailed information is listed below.

### **Services provided at Guild Building**

Services Provided at Guild Medical Building: Radiology, and MRI. Detailed information is listed below.

### **Services at the Norwood Performance Therapy**

The following services are provided at this location: PT, and OT. Detailed information is listed below.

### **Hematology Oncology**

Current utilization of services: Number of treatments scheduled per month below-

<b>October</b>	<b>November</b>	<b>December</b>
113	48	5

No new patients will be scheduled starting October 8, 2024. Hematology Oncology services will stop on October 25, 2024. All patients scheduled after this date will work with their provider to determine a plan for continuity of care and available options.

Letters will be sent to patients alerting them of the closure, and if they have not done so already, directing them to contact their Oncologist or specialty provider. The letters will also include information on how to contact an alternate site and reschedule any appointments if necessary. The Patient Assistance line number will be included in case they have questions.

### **Radiation Oncology**

Current Utilization of Services- Number of treatments scheduled per month:

<b>October</b>	<b>November</b>	<b>December</b>
31	30	14

No new patients will be scheduled starting October 8, 2024. Radiation Oncology services will stop on October 25, 2024, or when the last patient treatment is completed if prior to this date. All patients scheduled after this date are for follow up provider office visits. These patients have all been rescheduled at the providers office at Good Samaritan Medical Center.

Letters will be sent to patients alerting them of the closure, and if they have not done so already to contact their Oncologist. The letters will also include information on how to contact an alternate site and reschedule any appointments if necessary . The Patient Assistance line number will be included in case they have questions.

### **Diagnostic Imaging**

Current Utilization of Services number of appointments scheduled per month:

**Guild Building Imaging** includes Mammography, Bone Density, Ultrasound, and MRI

<b>October</b>	<b>November</b>	<b>December</b>
690	605	521

**Foxboro Imaging** includes Mammography, Bone Density, Ultrasound, and CT

<b>October</b>	<b>November</b>	<b>December</b>
544	285	212

Diagnostic Imaging services will be stopped on October 31, 2024. No radiologic tests requiring contrast, biopsies, or other medications will be scheduled after October 25, 2024. All patients scheduled after this date will be referred to their Primary Care or Specialty Provider to assist with rescheduling needed examinations at an alternate site.

Letters will be sent to patients alerting them of the closure. The letters will also include information to contact their primary care or specialty provider to obtain new orders/referrals needed to reschedule the appointment and identify alternative sites for appointments. The Patient Assistance line number will be included in case they have questions.

### **Physical Rehabilitation**

Current Utilization: number of appointments scheduled per month below.

<b>October</b>	<b>November</b>	<b>December</b>
403	155	27

Physical Rehabilitation services will be stopped on October 31, 2024. All patients scheduled after this date will be referred to their Primary Care or Specialty Provider to assist with rescheduling needed examinations at an alternate site.

Letters will be sent to patients alerting them to the fact that they have a future appointment scheduled that needs to be rescheduled. The letters will also include information to contact their primary care or specialty provider to obtain new orders/referrals needed to reschedule the appointment and identify alternative sites for appointments. The Patient Assistance Line number will be included in case they have questions.

To provide a safe and orderly transition and closure, the Hospital is providing the following information necessary for preserving access and health status in the Norwood and Foxboro service areas.

Norwood Hospital Satellites have identified the following alternative sites for care within the community. Below is a list of the services that the hospitals and outpatient sites provide. These sites provide similar and, in some cases, more comprehensive specialties.

<b>Hematology/Oncology/Radiation Oncology</b>	<b>Services Provided</b>	<b>Next Available Appointment</b>
Dana Farber 22 Patriot Place Foxboro MA 5.2 miles (508) 543- 1700 <ul style="list-style-type: none"> <li>Off peak travel time: 13 minutes</li> <li>Peak travel time: 17 minutes</li> </ul>	Wide range of oncology/hematology services , genetic counseling, clinical trials, pharmacy, nutrition, social services, finance	Accepting patients 1-2 weeks pending authorizations and referrals.
Sturdy Hematology Oncology 19 Sturdy Street Attleboro MA 9.8 miles (508) 236-7010 <ul style="list-style-type: none"> <li>Off peak travel time: 17 minutes</li> </ul>	Screening and diagnosis, blood disorders, bladder, breast, colorectal, digestive system, GYN, head and neck, kidney, leukemia, lung, lymph, metastatic, pancreas, prostate, skin including melanoma, testicular and penile, thyroid.	Accepting patients 2-3 weeks pending authorizations and referrals

<ul style="list-style-type: none"> <li>Peak travel time: 20 minutes</li> </ul>		
Brigham and Women's Sturdy Health Radiation Oncology 89 Forbes Boulevard Mansfield MA 1.7 miles (857) 307-3700 <ul style="list-style-type: none"> <li>Off peak and peak travel time: 4 minutes</li> </ul>	Blood disorders, bladder, breast, colorectal, digestive system, GYN, head and neck, kidney, leukemia, lung, lymph, metastatic, pancreas, prostate, skin including melanoma, testicular and penile, thyroid, radiation oncology	Accepting patients within 1 week pending authorizations and referrals
Good Samaritan Medical Center Medical Office Building 830 Oak Street Brockton MA 14 miles alternate routes <ul style="list-style-type: none"> <li>Peak and off peak travel time 23 minutes</li> </ul>	Oncology infusion clinic to be opened date to be determined	Appointments available at time of opening
Good Samaritan Medical Center 235 North Pearl Street Brockton MA (508) 427-3000 14 miles alternate routes <ul style="list-style-type: none"> <li>Peak and off peak travel time 23 minutes</li> </ul>	Radiology, CT, MRI.	Accepting patients pending authorizations and referrals
Good Samaritan Radiation Oncology Center 818 Oak Street Brockton MA (508) 427-2900 16.8 Miles Highway	Radiation Oncology	Appointments available at time of opening

<b>Radiology</b>	<b>Services Provided</b>
Shields MRI Dedham 40 Allied Drive Dedham MA (800) 258-4674 3.7 miles <ul style="list-style-type: none"> <li>Off peak travel time: 12 minutes</li> <li>Peak travel time: 17 minutes</li> </ul>	MRI, PET, and CT scan.
Rayus Radiology 200 Providence Highway Dedham MA (781) 329-0600 5.3 miles <ul style="list-style-type: none"> <li>Off peak travel time: 16 minutes</li> <li>Peak travel time: 19 minutes</li> </ul>	General radiology, MRI, Open and Stand Up MRI, CT scan.

Inview Diagnostic Imaging 200 Providence Highway Dedham MA (617) 910-3201 <ul style="list-style-type: none"> <li>Off peak travel time 16 minutes</li> <li>Peak travel time: 19 minutes</li> </ul>	Diagnostic radiology; in office/in home diagnostic US services.
Westwood Radiology @MGB Healthcare Center 100 Brigham Way University Station Westwood MA (617) 732-6248  4.9 Miles <ul style="list-style-type: none"> <li>Off peak travel time: 13 minutes</li> <li>Peak travel time: 16 minutes</li> </ul>	Breast imaging, imaging, US, x-ray, MRI, CT scan, and mammography.
Beth Israel Deaconess Hospital 148 Chestnut Street Needham MA (781) 453-7000 7.4 Miles <ul style="list-style-type: none"> <li>Off peak travel time 19 minutes</li> <li>Peak travel time 22 minutes</li> </ul>	CT, MRI, Nuclear Medicine, US, x-ray, fluoroscopy.

Physical Rehabilitation	Services Provided
Power PT, LLC 58 Bellevue Ave. Norwood MA (617) 680-9847 3 miles <ul style="list-style-type: none"> <li>Off peak travel time: 10 minutes</li> <li>Peak travel time: 10 minutes</li> </ul>	Specializing in Pelvic Floor, Pregnancy and Post-Partum, Orthopedic rehab, return to sports therapy. Offers in-home, in clinic, telehealth services.
Highbar PT 115 Norwood Park South #100 Norwood MA (781) 702-4630  2.2 miles <ul style="list-style-type: none"> <li>Off peak travel time: 7 minutes</li> <li>Peak travel time: 20 minutes</li> </ul>	Specializing in back pain, Graston technique, massage, PT, cupping, joint mobilization and manipulation, trigger point dry needling, neuromuscular re-education.
MA Sports and Spine 940 High Street Westwood MA (781) 708-9056 <ul style="list-style-type: none"> <li>Off peak travel time: 13 minutes</li> <li>Peak travel time: 16 minutes</li> </ul>	Post surgical ortho and spine rehab, extremity sprains/strains, sacroiliac and disc dysfunction, balance and vertigo rehab, chiropractic services, workers comp, and MVA rehab.
Lifespan Morton Hospital at Northwoods 2007 Bay Street Suite 200B Taunton MA (508)828-7265 20 miles	Physical and Occupational therapy. Orthopedic injuries, back and neck care. Carpel tunnel, sprains/fractures, shoulder issues and injuries.

<ul style="list-style-type: none"> <li>• Off peak travel time: 26 minutes</li> <li>• Peak travel time: 28 minutes</li> </ul>	
<p>Beth Israel Deaconess Needham 148 Chestnut Street Needham MA (781) 453- 3025</p> <ul style="list-style-type: none"> <li>• Off peak travel time: 23 minutes</li> <li>• Peak travel time: 23 minutes</li> </ul>	Physical and Occupational therapy. Orthopedic injuries, back and neck care. Carpel tunnel, sprains/fractures, shoulder issues and injuries.

### **Public Transportation Resources**

Gatra is the public transportation system for Foxboro MA. There is an MBTA rail station at Patriot Place servicing Foxboro residents.

There is a MBTA rail station located at 164 Broadway, Norwood MA and is available for residents of Norwood/Walpole/Westwood. There is bus service that runs to and from many of the alternate sites of care. The MBTA Ride service provides transportation to eligible Norwood residents. There are also several agencies within the Norwood area that provide transportation services to seniors. These include:

#### **Norwood COA Senior Center Bus Route**

Monday through Friday - medical appointments and transportation upon request by calling the front desk 24 hours prior to your pick up time at [781-762-1201](tel:781-762-1201), extension 7 for Transportation

#### **Norwood Seniors Network**

##### **Door-to-Door Escorted Transportation**

Let us help you get to the doctor, pharmacy, grocery store, the bank and visit with friends. We make sure you arrive on time for your doctor or dentist appointment. Our service area is limited to approximately five square miles, but trips outside the service area are honored whenever possible.

#### **GogoGrandparent**

[GoGoGrandparent | On-Demand Uber & Lyft Rides for Seniors](#)

A service of Uber and Lyft that services Norwood.

Ride fare: .76 base fare + .49 per mile + .72 per minute with a minimum fare of \$7.23.

### **Employees**

The Worker Adjustment and Retraining Notification Act (WARN) notifications are not required at the satellites as the number of employees at each site is below 50. There are 3 labor unions (MNA, 1199 SEIU and ATC) with members employed at these locations, and they were notified of the Norwood Hospital licensed satellite closures on October 7, 2024.

The Corporate Leadership Team will conduct a virtual Town Hall for the satellite employees on October 18, 2024. Additional Town Hall meetings may be scheduled as needed.

Employee assistance program (EAP) resources are actively available to all employees.

Employees will receive career and job support during the closure periods from a variety of resources, including, but not limited to, the Rapid Response and MassHire team, their respective unions (if bargaining unit members), and other local and nearby institutions seeking skilled and experienced healthcare staff. The Rapid Response Team services are planned to begin October 23, 2024. The services provided by the Rapid Response team include resume-writing, interview, and career workshops, as well as access to tools such as career centers, training funds for upskilling, and eligibility and application help for resources such as unemployment and MassHealth connector.

MassHire Rapid Response will share resources with a focus on the following topics:

- Rapid Response Services and locations
- MassHire Career Center Services
- Unemployment Insurance Eligibility & Obligations
- Training Opportunities
- Massachusetts Health Connector Information

### Staffing Changes

In the event of increased staff absences or resignations, the CNO and department directors are responsible for assuring safe staffing is maintained. Staff needs may result in the earlier closure of services. The satellite leadership will discuss any related service implications with the Department of Public Health.

### Work Force

The below employee counts are currently working at the Norwood Hospital satellites and are subject to being laid off.

Location	Per Diem	Part Time	Full Time	Grand Total
Balsamo/Administration	2	3	14	19
Cancer Center - Foxboro	6	6	9	21
DI Guild Building - Norwood	6	6	7	19
Diagnostic Imaging - Foxboro	3	6	5	14
Norwood Performance Therapy	5	4	4	13
<b>Grand Total</b>	<b>22</b>	<b>25</b>	<b>39</b>	<b>86</b>

While we cannot specify and know about all the positions available in the area, we have an MHA report from 2022 that points to there being approximately 19,000 open healthcare positions across Massachusetts.

## The Hospital Workforce Shortage

The new Massachusetts Health & Hospital Association (MHA) survey was conducted in the summer of 2022 and found that respondent hospitals – representing 70% of total acute care hospital employment in the state – currently have 6,650 vacancies among 47 key positions that are critical to clinical care and hospital operations. These positions range from direct care nurses to laboratory personnel, clinical support staff, and more. The median vacancy rate for these positions is 17.2%, and for

several positions, as shown in *Figure 1*, the vacancy rate is much higher. Forty-two of these positions have double-digit vacancy rates and 18 have a vacancy rate that is greater than 20%.

These 47 positions account for less than half of all positions within hospitals. **Extrapolating the vacancy data to all positions in all Massachusetts acute care hospitals, an estimated 19,000 positions are unfilled.**

**Figure 1: Massachusetts Hospital Vacancy Rates by Job Family & Position**

NURSING	
Job Name	% Vacancy Rate
Licensed Practical Nurse (LPN)	56%
Infection Control Nurse	26%
Nurse-Midwife (Certified)	25%
Psychiatric RN	21%
Nurse Practitioner (APRN)	18%
Emergency Department RN	17%
Med/Surg RN (Acute Care)	17%
Nurse Anesthetist (CRNA)	17%
Operating Room Nurse	13%
ICU RN (NICU, PICU, ICU, etc.)	10%
PACU RN	8%
Labor and Delivery RN	8%
Clinical Nurse Specialist (CNS)	8%

  

SUPPORT	
Job Name	% Vacancy Rate
Home Health Aide	34%
Sitter	30%
Certified Nurses Aide (CNA)	24%
Environmental Services Worker	18%
Food Services Worker	15%
Medical Assistant (Certified)	15%
Operating Room Aide	14%
Patient Transporter/Courier	14%

  

PT/OT	
Job Name	% Vacancy Rate
Occupational Therapy Assistant	17%
Physical Therapist	13%
Physical Therapy Assistant	12%
Occupational Therapist	10%

  

BEHAVIORAL HEALTH	
Job Name	% Vacancy Rate
Mental Health Worker/Technician (MHW)	32%
MSW Social Worker (LCSW)	29%
Psychologist	27%
Licensed Independent Social Worker (LICSW)	24%
Mental Health Counselor	17%
Social Worker (BSW)	17%

  

TECH	
Job Name	% Vacancy Rate
Pulmonary Function Technician	35%
Paramedic	28%
Surgical Technician/Technologist	26%
Anesthesia Technologist	24%
Registered Respiratory Therapist (RRT)	20%
Cardiac Catheter Tech	19%
Endoscopy Technician	19%
Medical Technologist (MT)	16%
Pharmacy Technician	15%
Radiologic Technologist	13%

  

OTHER	
Job Name	% Vacancy Rate
Patient Safety Specialist	22%
Phlebotomist	21%
Laboratory Assistant	17%
Physician Assistant	16%
Pharmacist	11%
Administrative/Clerical Staff	10%

## Community Leader Notification

Senator Lynch's Washington D.C. office was contacted on October 7, 2024, and a message was left with his aide, as directed by his Boston Office, stating specifically we wanted to update her on the status of Norwood Hospital. A return call was never received.

On October 7<sup>th</sup> State Representative John Rogers and State Senator Michael Rush were notified.

On October 7<sup>th</sup>, a message was left with the administrative assistant of Town Manager Tony Mazzucco telling him specifically we wanted to update him on the status of Norwood Hospital. He returned the call, and we discussed the reasons for the closure.

On October 8, 2024, the Chairman of the Board and the Chief of the Medical staff were notified.



Steward Health Care communicated with community officials and stakeholders, ways in which citizens can access health care services after the closure of Norwood Hospital Satellites. Communications will be provided to municipal officials that can be posted on their websites and social media platforms. The same communications will be appropriate for use by all stakeholders, and we will provide communications to the Town Manager, the senior center, and the Chamber of Commerce. We will provide them with:

- Email messages –
- Social media posts –
- Website messages –

### **Signage**

Signs will be posted in all building lobbies and on doors indicating the last day of service. At the time of closure all signage indicating Steward will be covered or removed. Steward will be assessing all the Norwood Hospital satellites on the week of October 15th, to determine if the DOT will require notification for removal of signage.

### **Communication Plan for Patients**

Currently there are 66 patients being followed at the cancer care center in Foxboro. Two physicians are providing 9 patients with chemotherapy and/or radiation treatments. These physicians will be speaking directly to their patients, informing them of the alternative choices for continuity of care. Patients will have the option to move with their current provider to a nearby treatment center or choose an alternative site for care.

There are 14 additional community providers not employed by Norwood Hospital caring for the remaining 57 patients receiving other infusions such as iron, IVIG, port flushes, etc. The CNO is communicating with these providers informing them of the satellite closure date and alternative sites in the community available for care.

Letters will be sent to all current patients of the Norwood Hospital satellites both in Norwood and Foxboro that are closing to inform them of the closing and information on continuity of care, rescheduling appointments, available options in the community, how to obtain their medical record and information on the Patient Assistance line for any additional questions they may have.

The Patient Assistance Line is staffed Monday – Friday 7:00 AM- 7:00 PM. The purpose of the line is to answer any number of questions ranging from accessing medical records, rescheduling procedures, referrals to providers/services, pending test results, payments/billing questions, lost and found, and all other questions. Patients will be provided with requested information and will be triaged to a subject matter expert for further follow up, if needed. The line will be available to patient until December 31, 2024.

### **Medical Records Access**

Steward is working to ensure complete access to patient records. MRO staff has been retained remotely to continue assisting with the record process request. A process has been established facilitating patient's retrieval of records.

After November 1<sup>st</sup>, 2024, a website landing page will direct patients to medical records retrieval and the forms will be available for download. The Medical Record Request Form will be available in the following languages: English, Russian, Arabic, and Spanish.

Medical records will be stored with a vendor with the ability to field requests and provide records in a timely manner.

The letters sent to patients will have information on how to obtain their medical record. These instructions will include a website address and an email address, and the Patient Assistance line phone number.

#### **Access to Human Resource Files**

All human resource employee files will be stored for 3 years, and other elements as required by law. There will be designated storage and points of contact for future access of files for all employees. Specific contact and storage information will be finalized leading up to the closure date.

#### **Medical Staff Office**

Medical staff files will be securely stored at an offsite location and maintained for ten (10) years, anything older will be disposed of properly. Letters and instructions for obtaining verifications of medical staff members will be sent to the medical staff prior to closure.

#### **Changes in Governing Board, Senior Leadership, and Medical Staff**

The Norwood Hospital Governing Body chair and President of the Medical Staff were notified of the proposed hospital closure date on October 8, 2024

The hospital will notify the Department of Public Health of any senior leader and medical staff leadership resignation(s) prior to closure. A final Governing Body meeting is planned for October 24, 2024, and a final Medical Executive Committee meeting is being scheduled.

#### **Disposition of Pharmaceuticals Including Controlled Substances**

Advance 14-day notification, as advised by the DEA will be sent to the DEA divisional office. The Massachusetts Drug Control Program and the Massachusetts Board of Pharmacy will be notified detailing the closure date, the plan for the medications, and cancellation of licenses.

An inventory of all medications will be completed, and any unopened non-scheduled stock items will be returned to Cardinal using the current return process. Stock that is unable to be returned, will be disposed of according to policy and regulation.

There are no automated dispensing machines on-site.

The hematology/oncology pharmacy will remain open until 10/25/24 or until the last patient appointment has been transferred.

At the time the hospital satellites close, the pharmacy staff will initiate and comply with all regulations required for pharmacy closure. All transfer and transactions will be documented, auditable, and will follow all State and Federal guidelines for disposal and documentation.

The disposition of all inventories will be completed on or before 10/25/24 and close out of all licenses and DEA Controlled Substance Ordering System (CSOS) will occur once all medications are no longer on site.

### **Diagnostic Imaging**

Notification letters will be sent to accrediting organizations – American College of Radiology Commission on Quality and Safety Accreditation, DPH, etc.

Any pending diagnostic imaging testing results (Ultrasound, CT, Xray, Mammography, etc.) will be sent to patient Primary Care Physician (PCP) or ordering provider and available via patient portal. Patients will be referred to Primary Care Physician (PCP) or ordering provider for any future outpatient Diagnostic imaging testing and scheduling needs.

Patients with imaging appointments scheduled after October 25, 2024 will be notified in writing to reach out to their PCP or ordering provider for a referral to an alternate site. The process for patient requests for electronic copies of imaging studies (CD) will be completed by October 31, 2024. In the interim, patients can contact the Patient Assistant Line.

### **DECOMMISSIONING THE SATELLITE SPACES**

#### **Staffing**

The satellite locations are leased properties, and currently not staffed by Steward facilities, environmental services, and security. Steward will retain satellite staff including nursing, imaging, and pharmacy as needed until October 31, 2024, or for closure activities including Identifying, cataloguing, and removal all PHI relocate to a secure off-site storage location.

Steward local staff, with the assistance of legal counsel and specialty vendors, will be undertaking the following workstreams:

#### **Regulatory**

- Coordinate with DPH and appropriate AHJ's to provide notices to terminate all applicable licenses and registrations or where required transfer licenses and permits to the property Owner (e.g. elevator permits, boiler permits, etc.).
- There is no known Highway signage nor local municipal roadway signage that would require removal by either the Department of Transportation or local municipal departments.

#### **Waste Removal**

- Hazardous/Biohazardous Waste: CREF is working with vendor (Stericycle) to identify all Hazardous (chemical) and Biohazardous waste, remove and dispose appropriately, and clean (terminally clean where indicated) all areas.
- General Waste: Remove all waste materials and appropriately dispose of all waste; clean areas after removal.

Pharmaceuticals: Working with vendor, Inmar remove and dispose appropriately, and clean (terminally clean where indicated) all areas.

### **Decommissioning and Building Closure**

- Remove all signage from building exterior; install appropriate signage directing potential patients.
- Remove Interior signage for pharmacy, medications, and hazardous materials areas.
- Final Cleaning (or terminal cleaning where indicated) of all areas.
- Close and secure all window and door openings.

#### Biohazardous, Radioactive / Nuclear, Pharmaceutical waste

- The on-going Management of Biohazardous, Radioactive, Pharmaceutical waste will remain in place through the closure of clinical operations under normal schedule pick-ups.
- Stericycle manages Biohazardous, Pharmaceutical, and Hazardous Waste.
- FX Massey manages Radioactive and Nuclear Waste, if any.

Stericycle and FX Massey will be notified that their services will continue through no later than November 30, 2024 for the removal of all remaining Biohazardous, Pharmaceutical, Hazardous Waste, Radioactive, and Nuclear Waste. Beginning November 1, 2024, Steward will be actively decommissioning the Leased Facilities and all remaining Biohazardous, Pharmaceutical, Hazardous Waste, Radioactive, and Nuclear Waste will be removed no later than November 30, 2024. Safety Security and Facility Systems

- The facilities will continue to be secured, utilities maintained and building systems operated in a manner consistent with the requirements of the landlord.

#### Notifications to the Department of Public Health

The hospital agrees to provide notification to the Department of Public Health of any element changes to this plan. The hospital agrees to provide the Department responses to requests to determine compliance with the closure plan.

#### Post Closure

The facility will remain open for up to 45 days for closure activities. A full facilities closure plan will be made available.

#### Closure Survey

The hospital and its Satellites agree to allow the Department of Public Health to conduct a satellite closure survey.