



The Commonwealth of Massachusetts  
Executive Office of Health and Human Services  
Department of Public Health  
Bureau of Health Care Safety and Quality  
Division of Health Care Facility Licensure and Certification  
67 Forest Street, Marlborough, MA 01752

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July 27, 2023

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BY EMAIL ONLY

**Re: Review of Response Following Essential Services Access Plan**  
**Facility:** Morton Hospital  
**Services:** Morton Hospital's Comprehensive Addiction Program ("MORCAP")  
**Ref. #:** 2022-606

Dear Mr. Levine:

On July 5, 2023, the Department of Public Health (the "Department" or "DPH") received Morton Hospital, A Steward Family Hospital Inc.'s (the "Hospital"), response ("Response") to DPH's June 26, 2023 comments on the Hospital's plan for access to services following the closure of MORCAP.

The Department has completed its review of the Response and has determined that many of the responses are substantively inadequate and do not satisfy the requirements of 105 CMR 130.122(G). As a result of this review, the Department has prepared the following comments:

- 1. Transportation:** Your Response states that the Hospital will offer "guidance on the various public transit routes to Carney Hospital and other alternative site services." 105 CMR 130.122(F) requires that the plan include "an assessment of transportation needs post closure and a plan for meeting those needs," and assure ongoing access to the service, as required by MGL c. 111, s. 51G(4) and 105 CMR 130.122. The Department has determined your Response does not meaningfully address the statutory and regulatory requirements noted above, and requires additional information on how the Hospital intends to assist families and patients who lack resources and need access to transportation once MORCAP is closed. While the

Hospital's stated intent is to keep the MORCAP services open until the SUD services at Carney are operational, it remains unclear, other than providing "sustained guidance", how the Hospital plans to address transportation needs of patients in and outside of the Hospital's service area post MORCAP closure. The Hospital is reminded of its obligation to ensure access to these substance use disorder treatment services for the surrounding community post-closure.

2. **Community Engagement:** In your Response, the Hospital stated that it continues to work diligently to provide updates to various stakeholders and elected officials in monthly community forums. While the Hospital has provided information related to one community group, the Community Crisis Intervention team, it does not clearly communicate how long the Hospital intends to continue these meetings and if the Hospital intends to initiate any additional forums, either in person or through other media, that will include other stakeholders, specifically local providers, patients, and state and local elected officials.
  
3. **Staffing:** In the response, the Hospital stated that it continues to engage in recruiting activities as part of the Hospital's commitment to staff and keep the 18 MORCAP beds open. The Hospital previously indicated that the required nursing staff for the 18 Level 4.0 beds will be available while MORCAP remains open, ". . . to the extent the census and the nursing staff support such staffing." In the Hospital's prior communication on June 15, 2023, the Hospital indicated "MORCAP will maintain 18 beds in operation until CARCAP opens with 25 beds." It is still unclear whether the Hospital intends to keep the MORCAP unit open regardless of the census, despite the language from the June 15, 2023 communication. The Department again requests the Hospital confirm that the MORCAP unit will remain operational regardless of census, as indicated in prior communications, and provide additional detail on how the Hospital plans to provide appropriate staffing, including agency and/or travel nurses.

You are required to submit these comments within 10 days of your receipt of this letter, to my attention, to be deemed in compliance with the requirements of 105 CMR 130.122 and M.G.L. c. 111, s. 51G.

Thank you for your continued cooperation in this process. If you have any questions, please contact me at [Stephen.Davis@Mass.Gov](mailto:Stephen.Davis@Mass.Gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Stephen Davis". The signature is fluid and cursive, with the first name "Stephen" written in a larger, more prominent script than the last name "Davis".

Stephen Davis  
Division Director

DPH Review of Response Following Essential Services Finding  
Page 3

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