



December 2, 2021

**VIA EMAIL (Stephen.Davis@state.ma.us)**

Stephen Davis, Director  
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

Re: Response to November 23, 2021, DPH Memo – “**Closure Plan Comments**” –  
Stonehedge Rehabilitation and Skilled Care Center (License #0534) - Ref #0534639

Dear Mr. Davis:

In response to your November 23, 2021 memo regarding our Closure Plan for Stonehedge Rehabilitation and Skilled Care Center, please see below response to your comments:

**1. Family and Resident Meetings**

The Facility announced the intent to close the Facility to the residents on October 4, 2021 in resident meetings conducted by Athena representatives. The Facility also offered and conducted one-to-one visits with any resident who expressed interest. The Facility’s social workers, facility ambassador, substance use disorder counselor and designees discussed the closure announcement with each resident individually in the resident’s room. Furthermore, the Facility provided each resident a written letter detailing the background and intention for closing the Facility. Thereafter, if a resident is admitted to the Facility after the closure announcement, the Facility will provide the resident and his or her family with a copy of the Notice of Intent to Close and the Closure Plan and will discuss the closure process.

Designated family members received a copy of the Facility's Notice of Intent to Close dated October 4, 2021, along with the Closure Plan, via USPS and email. A copy of this Closure Plan is also posted at the Facility and available from the Facility's Administrator upon request. While offered, no families expressed interest in accessing and using the Zoom platform to hold meetings.

The Facility is continuing to hold meetings for families and residents to discuss the Closure Plan, answer questions, and keep them informed on its progress.

Resident meeting schedule will be posted inside the Facility and reminders will be made through our Facility Ambassador. The upcoming meetings are scheduled as follows:

Resident Meetings to Discuss the Closure Plans  
December 16, 2021 and January 6, 2022

Family meetings will be publicized through postings in the facility, USPS, and email announcement with details on how to access the Zoom meeting, by both computer and phone only.

Family Meetings to Discuss the Closure Plans (via Zoom)  
December 16, 2021 and January 6, 2022

**2. Plan to Ensure Sufficient Staffing Prior to Closure:**

The Facility Staff received a copy of the Facility's Notice of Intent to Close dated October 4, 2021, which included a copy of the Closure Plan. Staff meetings and individual conferences were conducted and opportunities at other Athena facilities have been identified and shared with staff. Staff and managers were encouraged to apply to the open positions. Any Stonehedge employee who transfers to another Athena-related center will have their rate of pay, seniority, and vacation time honored.

At the October 4, 2021 meetings and in follow-up written communication, all employees were notified that Stonehedge needs to continue its operation through the closure, and it is necessary that the Facility maintain appropriate staffing patterns to ensure for the safety of our residents. With that in mind, the Facility has offered retention bonuses and other incentives to ensure that Facility will have sufficient staffing, including nursing staff, to ensure resident safety and attain the or maintain the highest practicable physical, mental, and psychosocial well-being of each resident. In addition, if necessary, the Facility will engage agency staffing.

Athena will also arrange for local nursing homes and employers to conduct a job fair at Stonehenge, if necessary, for our Stonehedge employees to find employment outside of Athena and contact the Massachusetts Dislocated Worker Center and the Massachusetts Career Center, enabling employees to take advantage of those services. We believe that this will further ensure for continuity of staffing at Stonehedge through its closure.

### **3. Transfer and Discharge**

The Facility is located within the greater Boston community. Boston and the neighboring communities have a substantial supply of licensed long term care placements available. If needed, the Facility will work with each resident and their family, if applicable, to find him or her an appropriate placement. Athena also owns and operates sixteen (16) other skilled nursing facilities in Massachusetts. Residents, at their choice, will have priority admission to these facilities.

Upon Department approval, the Facility staff shall contact long-term care facilities in the area and notify them of the impending closure and need for beds. The Facility will collect information from these other facilities and will make that information available to each resident or their legal representative. The Facility will accommodate planning communication between representatives of the nearby skilled nursing facilities and any resident or legal representative at their request in accordance with current COVID-19 protocols.

Upon finding beds, Facility staff shall match available beds with residents to arrange for the best accommodation in terms of location, services, and psychosocial needs. To the extent possible, residents and/or their families shall be given an opportunity to participate in this process and to visit a suggested Facility to determine whether it is acceptable.


The Facility will consult with each resident or legal representative and, with the resident's consent, interested family members regarding placement options and the placement process being considered. Once a placement is determined, the resident and family shall be notified in writing by the Facility of the proposed relocation and of their right to appeal such proposed relocation.

The Facility will prepare and orient the residents for the discharge in a form and manner they can understand. As necessary, appropriate psychological preparation and counseling for each resident shall be provided by the Facility to minimize the impact of the closure on residents and facilitate the residents' adjustment to their new environment. Residents will be transferred to receiving facilities in an orderly and safe fashion. The Facility will document the discharge of each resident's medical record.

Medical Records: Upon discharge, the resident will be transferred with a copy of their medical record and the Universal Transfer form. At a minimum, the following information will also be provided to the receiving provider:

- Resident's discharge summary completed by the doctor.
- The contact information for the resident's primary care doctor
- A copy of the MOLST, HCP, guardianship, and Power of Attorney (if applicable).
- A copy of the resident's comprehensive care plan goals.
- Copies of recent lab values.
- Physician progress notes.

Sincerely,



Lawrence G. Santilli  
Manager

cc: Walter Mackie, DPH