

**APPLICATION FOR DETERMINATION OF NEED**

**TRANSFER OF SITE**

**METROWEST MEDICAL CENTER:  
METROWEST HEALTH & WELLNESS CENTER  
METROWEST MEDICAL CENTER OUTPATIENT PRIMARY CARE  
FRAMINGHAM UNION HOSPITAL**

**DoN APPLICATION # MWMC-25040109-TS**

**BY**

**VHS ACQUISITION SUBSIDIARY NUMBER 9, INC.  
D/B/A METROWEST MEDICAL CENTER**

**April 2, 2025**

## **Table of Contents**

Attachment 1: DoN Transfer of Site Application Form

Attachment 2: Supplemental Responses to DoN Transfer of Site Application Form

Attachment 3: Corporate Documents (Certificate of Incorporation, Foreign Corporation Certificate of Registration, Certificate of Amendment)

Attachment 4: Affiliated Parties Form

Attachment 5: Affidavit of Truthfulness and Compliance

**Attachment 1: DoN Transfer of Site Application Form**

See Separate Attachment

## **Attachment 2: Supplemental Responses to DoN Transfer of Site Application Form**

### **Item 2: Project Description**

#### ***Item 2.1: Provide a brief description of the scope of the project.***

VHS Acquisition Subsidiary Number 9, Inc., d/b/a MetroWest Medical Center (“MWMC”) operates the following hospital and hospital satellites in connection with License No. VL8S:

- Framingham Union Campus, located at 115 Lincoln Street, Framingham, MA (hospital)
- MetroWest Health & Wellness Center, located at 761 Worcester Road, Framingham, MA (hospital satellite)
- MetroWest Medical Center Outpatient Primary Care, located at 61 Lincoln Street, Framingham, MA (hospital satellite)

MetroWest Health & Wellness Center (the “Center”) currently provides mammography, breast ultrasound, X-ray, bone density, physical therapy, occupational therapy, and speech therapy services (collectively, and together with the CT described below, the “Outpatient Services”). MWMC is planning to relocate these Outpatient Services as follows: (1) mammography, breast ultrasound, and bone density will be relocated from the Center to MetroWest Medical Center Outpatient Primary Care (“OPC”), which is approximately a two (2) mile drive from the Center; and (2) X-ray, physical therapy, occupational therapy and speech therapy will be relocated from the Center to the Framingham Union campus, which is approximately a 1.9 mile drive from the Center. In addition, MWMC currently has one (1) CT at the Center, and has and operates two (2) CTs at the Framingham Union campus. The CT at the Center has been non-operational since June 1, 2023 due to staffing challenges, and in response, MWMC has prioritized CT resources at the Framingham Union campus to support both inpatient and outpatient imaging needs. MWMC anticipates replacing one of the Framingham Union CTs with the Center CT, and decommissioning the CT that has been replaced, such that MWMC will continue to operate two (2) CTs at Framingham Union and will not have or operate any CT at the Center. MWMC plans to provide all relocated Outpatient Services, without interruption, to the same patient population. Following the transfer of Outpatient Services, the Center will be closed. MWMC anticipates a closure date on or about July 31, 2025.

By way of background, the lease for the Center has become cost-prohibitive for MWMC and MWMC has determined that it is in the best interests of MWMC and its patients to terminate the lease as of July 31, 2025. Closing the Center and relocating the Outpatient Services to the Framingham Union campus and the OPC location will enable MWMC to better allocate resources and enhance the quality of patient care, improve operational efficiency, and provide a more seamless healthcare experience. By closing the Center and centralizing services across MWMC’s Framingham Union campus and OPC location, which have a minimal distance of 0.2 miles between them, patients will benefit from improved access to comprehensive, coordinated care. The integration of certain imaging services, therapy services, and diagnostic capabilities on the Framingham Union campus will allow patients to receive multiple services during a single visit in a single location, eliminating travel time and reducing delays between appointments. Furthermore, patients who need services at both the Framingham Union campus and OPC location will experience reduced travel time and reduced delays between appointments. The consolidation of Outpatient Services to two locations (which are 0.2 miles apart), rather than three locations (one of

which is 2 miles from the others), supports a more patient-centered model of care by fostering greater collaboration among clinical teams, including radiologists, therapists, and other specialists. Enhanced communication and resource-sharing across departments, which results from the close proximity of the Framingham Union campus and the OPC location, will facilitate more timely diagnosis, treatment, and follow-up care. Additionally, with the closure of the Center, the relocation is designed to minimize service interruptions and improve resource allocation to better accommodate expected patient volumes without compromising the availability of services. Both the Framingham Union campus and the OPC location are equipped with modern infrastructure that supports advanced imaging technology and therapy spaces, enabling MWMC to deliver high-quality care more efficiently and effectively. Furthermore, the space at Framingham Union offers more dedicated private rooms for occupational and speech therapy, as well as a more controlled environment and private experience for physical therapy. Additionally, with respect to mammography, breast ultrasound, and bone density, the OPC location offers more square footage and additional exam rooms than the Center has, providing opportunities for increased patient access to these services.

As noted below, MWMC anticipates that the proposed Transfer of Site will not require any capital expenditure and will require a one-time operating cost in the amount of approximately \$137,600. For these reasons, together with MWMC's plan to maintain all current Outpatient Services (i.e., MWMC will not add new services), MWMC respectfully requests a finding by the Department that the proposed Transfer of Site does not require a Determination of Need pursuant to 105 CMR 100.715, either as a Substantial Capital Expenditure or Substantial Change in Service, in order for MWMC to move forward with the proposed Transfer of Site.

## **Item 5: DoN-Required Services and DoN Required Equipment**

### ***Item 5.1: Is this an application filed pursuant to 105 CMR 100.725: DoN-Required Equipment and DoN-Required Service?***

No. Currently, MWMC has three (3) CTs – one (1) is located at the Center, and the other two (2) are located at the Framingham Union campus. The Transfer of Site does not require any additional DoN-Required Equipment. Rather, the CT currently located at the Center (which is a 128-slice CT) will be transferred to the Framingham Union campus and will replace one of the CTs currently located at the Framingham Union campus, such that the same procedures will be performed, but more efficiently. The replaced CT will be decommissioned. Accordingly, following the completed Transfer of Site, MWMC will have and operate a total of two (2) CTs, both located at the Framingham Union campus.

## **Item 8: Transfer of Site**

### ***Item 8.3: Location of Proposed Site***

- *Framingham Union Campus* (hospital), located at 115 Lincoln Street, Framingham, MA: X-ray, physical therapy, occupational therapy and speech therapy will be transferred to the Framingham Union campus, and the CT will be transferred to the Framingham Union campus to replace a CT currently existing on the Framingham Union campus.

- *MetroWest Medical Center Outpatient Primary Care* (hospital satellite), located at 61 Lincoln Street, Framingham, MA: mammography, breast ultrasound, and bone density will be transferred to the OPC location.

***Item 8.4: Compare the scope of the project for each element:***

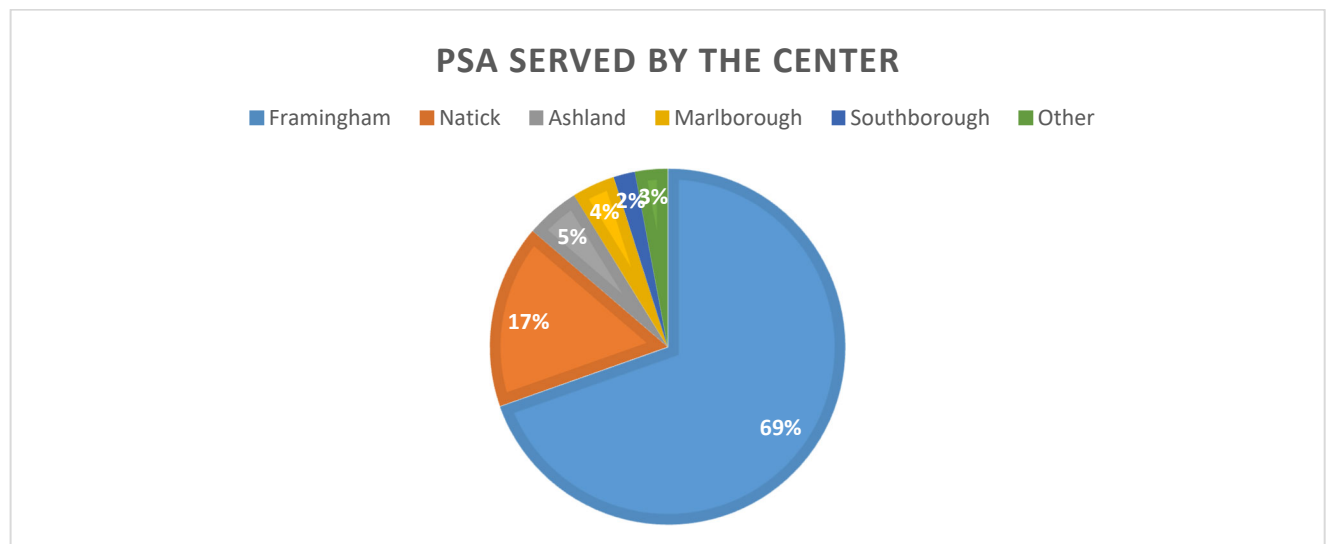
The following information details the scope of the Transfer of Site for each service.

**Gross Square Feet (GSF)**

| <b>Current Site – the Center</b>     | <b>Proposed Site – Framingham Union Campus</b>   | <b>Proposed Site – OPC Location</b>   |
|--------------------------------------|--|---|
| 11,200 GSF for 8 Outpatient Services | 4,020 GSF for 5 Outpatient Services: physical, occupational, and speech therapy, X-ray, CT | 4,348 GSF for 3 Outpatient Services: mammography, breast ultrasound, bone density |

**Primary Service Area Towns Served**

The Primary Service Area (PSA) towns currently served by the Center for each of the Outpatient Services include: Framingham (69% of Center patients), Natick (17% of Center patients), Ashland (5% of Center patients), Marlborough (4% of Center patients), and Southborough (2% of Center patients). Each of the proposed Transfer of Site locations (OPC and Framingham Union) are approximately 2 miles away from the Center and currently serve patients from the Center’s PSA. MWMC does not anticipate any change in the PSA.



## Patient Population (Demographics)

MWMC's FY2023 patient population data for the Outpatient Services are set forth below – one table for each Outpatient Service.

| <b>Mammography</b>                |                        |                     |                                  |
|-----------------------------------|------------------------|---------------------|----------------------------------|
| <b>Demographics</b>               | <b>Center Patients</b> | <b>OPC Patients</b> | <b>Framingham Union Patients</b> |
| <b>TOTAL UNIQUE PATIENTS</b>      | 11297                  | 0                   | 11                               |
| <b>Gender</b>                     |                        |                     |                                  |
| Female                            | 11280                  | 0                   | <11**                            |
| Male & Other/Unknown              | 17                     | 0                   | <11                              |
| <b>AGE</b>                        |                        |                     |                                  |
| 0-17                              | 0                      | 0                   | 0                                |
| 18-64                             | 7071                   | 0                   | <11                              |
| 65+                               | 4226                   | 0                   | <11                              |
| <b>RACE/ETHNICITY</b>             |                        |                     |                                  |
| American Indian/Alaska Native     | 22                     | 0                   | 0                                |
| Asian                             | 553                    | 0                   | <11                              |
| Black/African American            | 446                    | 0                   | 0                                |
| Hispanic Latino                   | 602                    | 0                   | <11                              |
| Native Hawaiian/ Pacific Islander | <11                    | 0                   | 0                                |
| White Caucasian                   | 9110                   | 0                   | 12                               |
| <b>PAYER MIX</b>                  |                        |                     |                                  |
| Commercial/Other*                 | 53                     | 0                   | 0                                |
| Managed Care HMO/POS/PPO          | 5088                   | 0                   | 0                                |
| Mass Health                       | 888                    | 0                   | <11                              |
| Managed Medicaid                  | 537                    | 0                   | 0                                |
| Commercial Medicare               | 1695                   | 0                   | 0                                |
| Medicare Fee for Service          | 122                    | 0                   | <11                              |
| Free Care/Health Safety Net       | 69                     | 0                   | 0                                |

| <b>Breast Ultrasound</b>          |                        |                     |                                  |
|-----------------------------------|------------------------|---------------------|----------------------------------|
| <b>Demographics</b>               | <b>Center Patients</b> | <b>OPC Patients</b> | <b>Framingham Union Patients</b> |
| <b>TOTAL UNIQUE PATIENTS</b>      | 1373                   | 0                   | 118                              |
| <b>Gender</b>                     |                        |                     |                                  |
| Female                            | 1356                   | 0                   | 118                              |
| Male & Other/Unknown              | 17                     | 0                   | <11                              |
| <b>AGE</b>                        |                        |                     |                                  |
| 0-17                              | <11                    | 0                   | 0                                |
| 18-64                             | 1027                   | 0                   | 84                               |
| 65+                               | 346                    | 0                   | 34                               |
| <b>RACE/ETHNICITY</b>             |                        |                     |                                  |
| American Indian/Alaska Native     | 4                      | 0                   | 0                                |
| Asian                             | 75                     | 0                   | 0                                |
| Black/African American            | 79                     | 0                   | 15                               |
| Hispanic Latino                   | 117                    | 0                   | 52                               |
| Native Hawaiian/ Pacific Islander | <11                    | 0                   | 0                                |
| White Caucasian                   | 1019                   | 0                   | 51                               |
| <b>PAYER MIX</b>                  |                        |                     |                                  |

|                                    |     |   |     |
|------------------------------------|-----|---|-----|
| <b>Commercial/Other*</b>           | <11 | 0 | <11 |
| <b>Managed Care HMO/POS/PPO</b>    | 564 | 0 | 81  |
| <b>Mass Health</b>                 | 215 | 0 | 37  |
| <b>Managed Medicaid</b>            | 108 | 0 | <11 |
| <b>Commercial Medicare</b>         | 153 | 0 | <11 |
| <b>Medicare Fee for Service</b>    | 179 | 0 | <11 |
| <b>Free Care/Health Safety Net</b> | 14  | 0 | 0   |

| <b>X-Ray</b>                             |                        |                     |                                  |
|--|------------------------|---------------------|----------------------------------|
| <b>Demographics</b>                      | <b>Center Patients</b> | <b>OPC Patients</b> | <b>Framingham Union Patients</b> |
| <b>TOTAL UNIQUE PATIENTS</b>             | 583                    | 0                   | 3838                             |
| <b>Gender</b>                            |                        |                     |                                  |
| <b>Female</b>                            | 368                    | 0                   | 2154                             |
| <b>Male &amp; Other/Unknown</b>          | 217                    | 0                   | 1680                             |
| <b>AGE</b>                               |                        |                     |                                  |
| <b>0-17</b>                              | 89                     | 0                   | 455                              |
| <b>18-64</b>                             | 288                    | 0                   | 1970                             |
| <b>65+</b>                               | 206                    | 0                   | 1413                             |
| <b>RACE/ETHNICITY</b>                    |                        |                     |                                  |
| <b>American Indian/Alaska Native</b>     | <11                    | 0                   | 237                              |
| <b>Asian</b>                             | 23                     | 0                   | 287                              |
| <b>Black/African American</b>            | 33                     | 0                   | 229                              |
| <b>Hispanic Latino</b>                   | 40                     | 0                   | 556                              |
| <b>Native Hawaiian/ Pacific Islander</b> | <11                    | 0                   | <11                              |
| <b>White Caucasian</b>                   | 398                    | 0                   | 2850                             |
| <b>PAYER MIX</b>                         |                        |                     |                                  |
| <b>Commercial/Other*</b>                 | <11                    | 0                   | 114                              |
| <b>Managed Care HMO/POS/PPO</b>          | 258                    | 0                   | 1188                             |
| <b>Mass Health</b>                       | 15                     | 0                   | 673                              |
| <b>Managed Medicaid</b>                  | 42                     | 0                   | 282                              |
| <b>Commercial Medicare</b>               | 82                     | 0                   | 574                              |
| <b>Medicare Fee for Service</b>          | 117                    | 0                   | 749                              |
| <b>Free Care/Health Safety Net</b>       | 0                      | 0                   | 29                               |

| <b>Bone Density</b>          |                        |                     |                                  |
|------------------------------|------------------------|---------------------|----------------------------------|
| <b>Demographics</b>          | <b>Center Patients</b> | <b>OPC Patients</b> | <b>Framingham Union Patients</b> |
| <b>TOTAL UNIQUE PATIENTS</b> | 1075                   | 0                   | 0                                |
| <b>Gender</b>                |                        |                     |                                  |
| <b>Female</b>                | 1016                   | 0                   | 0                                |



|  |     |   |   |
|--|-----|---|---|
| <b>Male &amp; Other/Unknown</b>          | 59  | 0 | 0 |
| <b>AGE</b>                               |     |   |   |
| <b>0-17</b>                              | 0   | 0 | 0 |
| <b>18-64</b>                             | 286 | 0 | 0 |
| <b>65+</b>                               | 789 | 0 | 0 |
| <b>RACE/ETHNICITY</b>                    |     |   |   |
| <b>American Indian/Alaska Native</b>     | <11 | 0 | 0 |
| <b>Asian</b>                             | 65  | 0 | 0 |
| <b>Black/African American</b>            | 30  | 0 | 0 |
| <b>Hispanic Latino</b>                   | 44  | 0 | 0 |
| <b>Native Hawaiian/ Pacific Islander</b> | <11 | 0 | 0 |
| <b>White Caucasian</b>                   | 904 | 0 | 0 |
| <b>PAYER MIX</b>                         |     |   |   |
| <b>Commercial/Other*</b>                 | <11 | 0 | 0 |
| <b>Managed Care HMO/POS/PPO</b>          | 298 | 0 | 0 |
| <b>Mass Health</b>                       | 32  | 0 | 0 |
| <b>Managed Medicaid</b>                  | 23  | 0 | 0 |
| <b>Commercial Medicare</b>               | 23  | 0 | 0 |
| <b>Medicare Fee for Service</b>          | 398 | 0 | 0 |
| <b>Free Care/Health Safety Net</b>       | <11 | 0 | 0 |

| <b>Physical Therapy</b>                  |                        |                     |                                  |
|--|------------------------|---------------------|----------------------------------|
| <b>Demographics</b>                      | <b>Center Patients</b> | <b>OPC Patients</b> | <b>Framingham Union Patients</b> |
| <b>TOTAL UNIQUE PATIENTS</b>             | 2457                   | 0                   | 0                                |
| <b>Gender</b>                            |                        |                     |                                  |
| <b>Female</b>                            | 1637                   | 0                   | 0                                |
| <b>Male &amp; Other/Unknown</b>          | 820                    | 0                   | 0                                |
| <b>AGE</b>                               |                        |                     |                                  |
| <b>0-17</b>                              | 119                    | 0                   | 0                                |
| <b>18-64</b>                             | 1353                   | 0                   | 0                                |
| <b>65+</b>                               | 985                    | 0                   | 0                                |
| <b>RACE/ETHNICITY</b>                    |                        |                     |                                  |
| <b>American Indian/Alaska Native</b>     | 22                     | 0                   | 0                                |
| <b>Asian</b>                             | 120                    | 0                   | 0                                |
| <b>Black/African American</b>            | 175                    | 0                   | 0                                |
| <b>Hispanic Latino</b>                   | 464                    | 0                   | 0                                |
| <b>Native Hawaiian/ Pacific Islander</b> | <11                    | 0                   | 0                                |
| <b>White Caucasian</b>                   | 1650                   | 0                   | 0                                |
| <b>PAYER MIX</b>                         |                        |                     |                                  |
| <b>Commercial/Other*</b>                 | 98                     | 0                   | 0                                |
| <b>Managed Care HMO/POS/PPO</b>          | 523                    | 0                   | 0                                |

|                                    |     |   |   |
|------------------------------------|-----|---|---|
| <b>Mass Health</b>                 | 464 | 0 | 0 |
| <b>Managed Medicaid</b>            | 251 | 0 | 0 |
| <b>Commercial Medicare</b>         | 251 | 0 | 0 |
| <b>Medicare Fee for Service</b>    | 522 | 0 | 0 |
| <b>Free Care/Health Safety Net</b> | 22  | 0 | 0 |

| <b>Occupational Therapy</b>              |                        |                     |                                  |
|--|------------------------|---------------------|----------------------------------|
| <b>Demographics for Mammography</b>      | <b>Center Patients</b> | <b>OPC Patients</b> | <b>Framingham Union Patients</b> |
| <b>TOTAL UNIQUE PATIENTS</b>             | 488                    | 0                   | 0                                |
| <b>Gender</b>                            |                        |                     |                                  |
| <b>Female</b>                            | 326                    | 0                   | 0                                |
| <b>Male &amp; Other/Unknown</b>          | 162                    | 0                   | 0                                |
| <b>AGE</b>                               |                        |                     |                                  |
| <b>0-17</b>                              | 0                      | 0                   | 0                                |
| <b>18-64</b>                             | 345                    | 0                   | 0                                |
| <b>65+</b>                               | 125                    | 0                   | 0                                |
| <b>RACE/ETHNICITY</b>                    |                        |                     |                                  |
| <b>American Indian/Alaska Native</b>     | <11                    | 0                   | 0                                |
| <b>Asian</b>                             | 27                     | 0                   | 0                                |
| <b>Black/African American</b>            | 10                     | 0                   | 0                                |
| <b>Hispanic Latino</b>                   | 72                     | 0                   | 0                                |
| <b>Native Hawaiian/ Pacific Islander</b> | 0                      | 0                   | 0                                |
| <b>White Caucasian</b>                   | 356                    | 0                   | 0                                |
| <b>PAYER MIX</b>                         |                        |                     |                                  |
| <b>Commercial/Other*</b>                 | 13                     | 0                   | 0                                |
| <b>Managed Care HMO/POS/PPO</b>          | 209                    | 0                   | 0                                |
| <b>Mass Health</b>                       | 49                     | 0                   | 0                                |
| <b>Managed Medicaid</b>                  | 47                     | 0                   | 0                                |
| <b>Commercial Medicare</b>               | 47                     | 0                   | 0                                |
| <b>Medicare Fee for Service</b>          | 78                     | 0                   | 0                                |
| <b>Free Care/Health Safety Net</b>       | 0                      | 0                   | 0                                |

| Speech Therapy                    |                 |              |                           |
|-----------------------------------|-----------------|--------------|---------------------------|
| Demographics                      | Center Patients | OPC Patients | Framingham Union Patients |
| TOTAL UNIQUE PATIENTS             | <11             | 0            | 0                         |
| Gender                            |                 |              |                           |
| Female                            | <11             | 0            | 0                         |
| Male & Other/Unknown              | 0               | 0            | 0                         |
| AGE                               |                 |              |                           |
| 0-17                              | 0               | 0            | 0                         |
| 18-64                             | <11             | 0            | 0                         |
| 65+                               | <11             | 0            | 0                         |
| RACE/ETHNICITY                    |                 |              |                           |
| American Indian/Alaska Native     | 0               | 0            | 0                         |
| Asian                             | 0               | 0            | 0                         |
| Black/African American            | 0               | 0            | 0                         |
| Hispanic Latino                   | 0               | 0            | 0                         |
| Native Hawaiian/ Pacific Islander | 0               | 0            | 0                         |
| White Caucasian                   | <11             | 0            | 0                         |
| PAYER MIX                         |                 |              |                           |
| 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                         |

| Computed Tomography (CT) Scan |                 |              |                           |
|-------------------------------|-----------------|--------------|---------------------------|
| Demographics                  | Center Patients | OPC Patients | Framingham Union Patients |
| TOTAL UNIQUE PATIENTS         | 0               | 0            | 4730                      |
| Gender                        |                 |              |                           |
| Female                        | 0               | 0            | 2575                      |
| Male & Other/Unknown          | 0               | 0            | 2155                      |
| AGE                           |                 |              |                           |
| 0-17                          | 0               | 0            | 199                       |
| 18-64                         | 0               | 0            | 2580                      |
| 65+                           | 0               | 0            | 1951                      |
| RACE/ETHNICITY                |                 |              |                           |
| American Indian/Alaska Native | 0               | 0            | 18                        |
| Asian                         | 0               | 0            | 205                       |
| Black/African American        | 0               | 0            | 164                       |

|  |   |   |      |
|--|---|---|------|
| <b>Hispanic Latino</b>                   | 0 | 0 | 303  |
| <b>Native Hawaiian/ Pacific Islander</b> | 0 | 0 | <11  |
| <b>White Caucasian</b>                   | 0 | 0 | 4040 |
| <b>PAYER MIX</b>                         |   |   |      |
| <b>Commercial/Other*</b>                 | 0 | 0 | 45   |
| <b>Managed Care HMO/POS/PPO</b>          | 0 | 0 | 1167 |
| <b>Mass Health</b>                       | 0 | 0 | 412  |
| <b>Managed Medicaid</b>                  | 0 | 0 | 292  |
| <b>Commercial Medicare</b>               | 0 | 0 | 741  |
| <b>Medicare Fee for Service</b>          | 0 | 0 | 986  |
| <b>Free Care/Health Safety Net</b>       | 0 | 0 | 32   |

\*Commercial and Other are combined

\*\*To protect patient confidentiality, categories with less than 11 patients have been counted in another related category and noted with "<11".

## **Patient Access**

The Transfer of Site will ensure continued access to essential services following the closure of the Center while also improving overall access and the patient experience. Framingham Union and the OPC location are 0.2 miles apart. The Transfer of Site will streamline patient care by consolidating services to essentially one location (due to the proximity of the Framingham Union campus and the OPC location), reducing the need for patients to navigate between multiple facilities for different aspects of their treatment.

Housing the Outpatient Services together fosters increased collaboration among providers, allowing for more seamless communication and coordination of care. This, in turn, leads to more efficient care processes, minimization of delays, and enhancements to the overall quality of care delivered to patients. Additionally, with providers working in closer proximity, there is greater opportunity for interdisciplinary consultation, leading to more comprehensive and integrated treatment plans.

Another significant advantage of the proposed Transfer of Site is improved accessibility through public transportation, which is more readily available with respect to the Framingham Union campus and the OPC location than with the Center. This ensures that patients who rely on public transit can more easily reach their appointments without the burden of complicated travel arrangements.

Furthermore, the centralized location of the Outpatient Services is expected to improve patient access by reducing logistical barriers, such as multiple appointments at different sites or potential transportation challenges. With the geographic consolidation of Outpatient Services and enhanced public transportation options, patients can receive necessary evaluations, treatments, and follow-ups in a more convenient and time-efficient manner.

Overall, the Transfer of Site not only ensures the continuity of Outpatient Services but also enhances access, coordination, and efficiency, ultimately improving both the patient experience and health outcomes.

The following transportation options and amenities are available for patients:

*OPC location: 61 Lincoln Street, Framingham, MA (Mammography, Breast Ultrasound, Bone Density)*

- Located approximately 2 miles from the Center.

- **Public Transportation:** Accessible via the MetroWest Regional Transit Authority (MWRTA) Bus Route 7, which stops 0.2 miles from 61 Lincoln Street.
- **Commuter Rail:** 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.
- **Parking:** Ample on-site parking is available for free to all patients, including ADA-compliant spaces.

*Framingham Union Campus: 115 Lincoln Street, Framingham, MA (X-ray, Physical Therapy, Occupational Therapy, Speech Therapy)*

- Located approximately 1.9 miles from the Center.
- **Public Transportation:** Accessible via MWRTA Bus Route 7, which stops 0.1 miles from the entrance of the main Framingham Union campus.
- **Commuter Rail:** The Framingham MBTA Station, located approximately 0.8 miles from the Framingham Union campus, serves the Framingham/Worcester Commuter Rail Line, offering access from surrounding towns including Natick, Ashland, and Southborough.
- **Parking:** Ample on-site parking is available for free to all patients, including ADA-compliant spaces.

### **Impact on Price**

MWMC does not anticipate any change in service prices or reimbursement rates due to the Transfer of Site. All pricing will remain consistent with current charges for all Outpatient Services upon implementation of the Transfer of Site.

### **Total Medical Expenditure**

MWMC does not anticipate any change to total medical expenditure associated with the Transfer of Site. Following the Transfer of Site, MWMC will continue to meet current patient demand for the Outpatient Services, and the Transfer of Site also will help MWMC meet future patient demand. Additionally, as noted above, no change will occur with respect to the price of Outpatient Services following the Transfer of Site.

### **Provider Costs**

MWMC anticipates that provider costs will decrease due to the elimination of lease payments and lower facility and utility expenses associated with the closure of the Center. Basic utilities at the Framingham Union campus and the OPC location currently exist and are paid for by MWMC; the proposed Transfer of Site will result in only a slight incremental utility cost at these locations. Staffing will be optimized by integrating services throughout Framingham Union Hospital, allowing flexibility for certain caregivers to provide both inpatient and outpatient treatment as appropriate. MWMC anticipates that all current employees will remain in their specific modalities and continue working on the outpatient side at one of the two transfer locations. No additional full-time staff will be required.

## **Site Descriptions**

Currently, the Center operates across multiple floors, with distinct areas for each service.

With respect to imaging, mammography and breast ultrasound services are located on the third floor of the Center, with six (6) exam rooms, three (3) administrative offices, and supporting waiting areas. Additionally, bone density services are situated on the third floor of the Center, while X-ray services are located on the ground floor of the Center. Bone density services and X-ray services are managed by the same technologist, requiring frequent movement between floors, which can lead to delays.

Following the Transfer of Site, mammography, breast ultrasound and bone density services will be offered from the OPC location, where the layout will improve service workflow. The OPC location features fourteen (14) total rooms, including ten (10) exam rooms and four (4) administrative offices. Additionally, at the Framingham Union campus, X-ray will be located in two (2) rooms adjacent to each other, separated by a centralized technologist workroom. This arrangement will allow the same technologist to efficiently oversee X-ray services in both rooms, while another technologist will oversee bone density services, without the need for either to move between different floors.

With respect to the rehabilitation services (i.e., physical therapy (PT), occupational therapy (OT), and speech therapy (ST)), they currently are located on the first floor of the Center. This space consists of eight (8) PT bays, one (1) OT room, and a private area for ST sessions.

Following the Transfer of Site to the Framingham Union campus, these rehabilitation services will be located in space that was originally designed to house these specific services, which includes six (6) PT bays (which is more appropriate to MWMC's PT patient volume) on the ground floor, and on the first floor, two (2) dedicated OT rooms and two (2) private ST rooms. The area also includes designated workspace for therapists and staff (as opposed to the Center, where the workspace was separate from the treatment area), thereby improving care coordination.

### ***Item 8.5: Detail all anticipated Capital Expenditures to be incurred as a result of the proposed Transfer of Site.***

MWMC does not anticipate any capital expenditure associated with the proposed Transfer of Site. The costs associated with the Proposed Transfer of Site will be one-time operational costs, which encompass a refresh of the new service areas (e.g., repainting), as well as the relocation of equipment, such as imaging devices and therapy equipment, and legal fees. MWMC estimates that such one-time operational costs will be approximately \$137,600.

### **Item 12: Total Value and Filing Fee**

#### ***Item 12.1: Total Value of this project:***

As previously stated, MWMC does not anticipate any capital expenditures associated with the proposed Transfer of Site. MWMC anticipates minor increases in utility and maintenance expenses at the transfer locations, but these will be simultaneously offset by reductions in lease and property tax costs from closing the Center.

***Item 12.4: Maximum Incremental Operating Expense***

As previously stated, MWMC anticipates one-time operational costs in the amount of approximately \$137,600. Any ongoing incremental operating expenses are expected to be minimal. MWMC anticipates minor increases in utility and maintenance expenses at the transfer locations, but these will be simultaneously offset by reductions in lease and property tax costs from closing the Center. Staffing costs will remain stable due to redistribution of existing personnel.

***Item 12.5: Total Proposed Construction Costs Contracted Out to Local or Minority, Women, or Veteran-Owned Businesses***

MWMC does not anticipate having any construction costs.



# **DoN APPLICATION # MWMC-25040109-TS**

**VHS ACQUISITION SUBSIDIARY NUMBER 9, INC.**

**Corporate filings with the Massachusetts Secretary of State**

Foreign Corporation Certificate (October 12, 2004):

[https://corp.sec.state.ma.us/CorpWeb/CorpSearch/CorpSearchRedirector.aspx?Action=PDF&Path=CORP\\_DRIVE1/2004/1012/000113413/0001/200487058730\\_1.pdf](https://corp.sec.state.ma.us/CorpWeb/CorpSearch/CorpSearchRedirector.aspx?Action=PDF&Path=CORP_DRIVE1/2004/1012/000113413/0001/200487058730_1.pdf)

Amended Foreign Corporations Certificate (February 9, 2021):

[https://corp.sec.state.ma.us/CorpWeb/CorpSearch/CorpSearchRedirector.aspx?Action=PDF&Path=CORP\\_DRIVE1/2021/0209/001990097/0001/202130257060\\_1.pdf](https://corp.sec.state.ma.us/CorpWeb/CorpSearch/CorpSearchRedirector.aspx?Action=PDF&Path=CORP_DRIVE1/2021/0209/001990097/0001/202130257060_1.pdf)



# Massachusetts Department of Public Health

## Determination of Need

### Affidavit of Truthfulness and Compliance

#### with Law and Disclosure Form 100.405(B)

Version: 7-6-17

**Instructions:** Complete Information below. When complete check the box "This document is ready to print:". This will date stamp and lock the form. Print Form. Each person must sign and date the form. When all signatures have been collected, scan the document and e-mail to: **dph.don@state.ma.us** Include all attachments as requested.

Application Number: MWMC-25040109-TS

Original Application Date: April 2, 2025

Applicant Name: VHS Acquisition Subsidiary Number 9, Inc., d/b/a MetroWest Medical Center

Application Type: Transfer of Site/Change in Designated Location

Applicant's Business Type: ☒ Corporation ☐ Limited Partnership ☐ Partnership ☐ Trust ☐ LLC ☐ OtherIs the Applicant the sole member or sole shareholder of the Health Facility(ies) that are the subject of this Application? ☒ Yes ☐ No

The undersigned certifies under the pains and penalties of perjury:

1. The Applicant is the sole corporate member or sole shareholder of the Health Facility[ies] that are the subject of this Application;
2. I have read 105 CMR 100.000, the Massachusetts Determination of Need Regulation;
3. I understand and agree to the expected and appropriate conduct of the Applicant pursuant to 105 CMR 100.800;
4. I have read this application for Determination of Need including all exhibits and attachments, and certify that all of the information contained herein is accurate and true;
5. If subject to M.G.L. c. 6D, § 13 and 958 CMR 7.00, I have submitted such Notice of Material Change to the HPC - in accordance with 105 CMR 100.405(G);
6. Pursuant to 105 CMR 100.210(A)(3), I certify that both the Applicant and the Proposed Project are in material and substantial compliance and good standing with relevant federal, state, and local laws and regulations, as well as with all previously issued Notices of Determination of Need and the terms and Conditions attached therein;
7. I have read and understand the limitations on solicitation of funding from the general public prior to receiving a Notice of Determination of Need as established in 105 CMR 100.415;
8. Pursuant to 105 CMR 100.705(A), I certify that the Applicant has Sufficient Interest in the Site or facility; and
9. Pursuant to 105 CMR 100.705(A), I certify that the Proposed Project is authorized under applicable zoning by-laws or ordinances, whether or not a special permit is required; or,
  - a. If the Proposed Project is not authorized under applicable zoning by-laws or ordinances, a variance has been received to permit such Proposed Project; or,
  - b. The Proposed Project is exempt from zoning by-laws or ordinances.

**Corporation:**

Attach a copy of Articles of Organization/Incorporation as amended

John Whitlock Jr

4/2/2025 | 9:33 AM CDT

CEO for Corporation Name:

Signature:

Date

Type name here

Board Chair for Corporation Name:

Signature:

Date

This document is ready to print: ☐

Date/time Stamp:



# Massachusetts Department of Public Health

## Determination of Need

### Affiliated Parties

Version: DRAFT  
3-15-17

**DRAFT**

Application Date: 04/02/2025 Application Number: MWMC-25040109-TS

### Applicant Information

Applicant Name: VHS Acquisition Subsidiary Number 9, Inc. DBA MetroWest Medical Center

Contact Person: Neil Wallis Title: Associate Administrator

Phone: 5182609999 Ext: E-mail: Neil1.Wallis@mwmc.com

### Affiliated Parties

**1.9 Affiliated Parties:**  
List all officers, members of the board of directors, trustees, stockholders, partners, and other Persons who have an equity or otherwise controlling interest in the application.

| Add/<br>Del<br>Rows                               | Name<br>(Last) | Name<br>(First) | Mailing Address      | City       | State | Affiliation                  | Position with affiliated<br>entity<br>(or with Applicant) | Stock,<br>shares, or<br>partnership | Percent<br>Equity<br>(numbers<br>only) | Convictions<br>or<br>violations | List other health care<br>facilities affiliated with | Business<br>relationship<br>with<br>Applicant |
|---|----------------|-----------------|----------------------|------------|-------|------------------------------|---|-------------------------------------|--|---------------------------------|--|---|
| <input type="checkbox"/> <input type="checkbox"/> | Whitlock       | John            | 115 Lincoln Street   | Framingham | MA    | Tenet Healthcare Corporation | President and CEO   |                                     | 0%                                     | No                              |  |   |
| <input type="checkbox"/> <input type="checkbox"/> | Pagano         | Angela          | 14201 Dallas Parkway | Dallas     | TX    | Tenet Healthcare Corporation | Vice President  |                                     | 0%                                     | No                              |  |   |
| <input type="checkbox"/> <input type="checkbox"/> | Strupp         | Diane           | 14201 Dallas Parkway | Dallas     | TX    | Tenet Healthcare Corporation | Vice President  |                                     | 0%                                     | No                              |  |   |
| <input type="checkbox"/> <input type="checkbox"/> | Mack           | Kristina        | 14201 Dallas Parkway | Dallas     | TX    | Tenet Healthcare Corporation | Secretary   |                                     | 0%                                     | No                              |  |   |
| <input type="checkbox"/> <input type="checkbox"/> | Smith          | Sharilee        | 14201 Dallas Parkway | Dallas     | TX    | Tenet Healthcare Corporation | Director  |                                     | 0%                                     | No                              |  |   |

### Document Ready for Filing

When document is complete click on "document is ready to file". This will lock in the responses and date and time stamp the form. To make changes to the document un-check the "document is ready to file" box. Edit document then lock file and submit Keep a copy for your records. Click on the "Save" button at the bottom of the page.

To submit the application electronically, click on the "E-mail submission to Determination of Need" button.

This document is ready to file: ☒

Date/time Stamp: 04/02/2025 11:17 am

E-mail submission to  
Determination of Need