

HUSCH BLACKWELL

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April 20, 2023

VIA E-MAIL

Stephen Davis, Director
Division of Health Care Facility Licensure and Certification
Bureau of Health Care Safety and Quality
Department of Public Health
67 Forest Street
Marlborough, MA 01752

Re: Morton Hospital's Comprehensive Addiction Program ("MORCAP")

Dear Mr. Davis:

We write on behalf of Morton Hospital located at 88 Washington Street, Taunton, MA 02780 (the "Hospital"). As we discussed last week, after reviewing its strategic options, the Hospital decided to change the regulatory path for Steward Health Care System, LLC ("Steward") to establish a substance use service in Dorchester. Thus, the Hospital hereby provides an updated ninety (90) day notice to the Department of Public Health ("Department") of its proposed relocation of MORCAP to Carney Hospital in Dorchester ("CARCAP"). This letter is in follow-up to the notices that were filed with the appropriate parties on March 1, 2023 (Exhibit 1) and March 30, 2023 (the initial 90-day notice – Exhibit 2). We offer the following updates to the Department with respect to this matter.

Steward has decided that the Hospital's substance use service should be a licensed service of Carney Hospital and no longer be a service of Morton Hospital. In order to accomplish this, Steward must now submit a full Determination of Need ("DoN") application with the Department to create a 25 Level 4 bed substance use service at Carney Hospital to be called CARCAP. As a result of its decision, Steward has withdrawn its DoN Transfer of Site ("TOS") submission that was filed on March 1, 2023.

As stated in the prior notices, MORCAP has 32 licensed substance abuse beds. At present 18 are currently in service and 14 beds are temporarily out of service as the beds are being utilized as med/surg beds pursuant to public health emergency DPH waivers. The plan is for the 14 beds to be permanently converted to med/surg beds.

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Accordingly, pursuant to this updated 90-day notice, the closure of MORCAP will occur no earlier than July 18, 2023, but as noted previously, the current plan is to maintain in service the 18 bed MORCAP program until the CARCAP services open in Dorchester.

Please note to ensure that notice of this change has been communicated to interested parties, we have provided notice to those parties initially provided notice on March 1, 2023 and the 90-day notice provided on March 30, 2023. We look forward to the scheduling of the public hearing on this matter. Thank you for your attention to this matter. If you have any questions, please feel free to contact me.

Sincerely,



Andrew S. Levine

Enclosures (2)

cc: J. Bernice, DPH
A. Bianco, EOHHS
D. Calvert, DPH
S. Carlson, DPH
R. Kaye, Esq., DPH
E. Kelley, DPH
W. Mackie, Esq., DPH
T. McNamara, DPH
A. Mehlman, Esq., DPH
E. Weil, DPH
S. McLaren, Carney Hospital, Steward
M. Girard, M.D., Steward
N. Hibble, Esq., Steward
D. Mehegan, Steward
J. Weinstein, M.D., Steward

Morton Hospital staff and providers
Morton Hospital Patient Family Advisory Committee
Morton Hospital Board of Directors
Shaunna O'Connell, Mayor of Taunton

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Senator Marc R. Pacheco
Representative Carol A. Doherty
Kelly A. Dooner, Council President

Health Policy Commission (HPC)
Office of the Attorney General (Massachusetts)
Center for Health Information and Analysis (CHIA)
Executive Office of Labor and Workforce Development (EOLWD)
Bureau of Substance Addiction Services (BSAS)

Community Counseling of Bristol County, 1 Washington Street, Taunton, MA 02780
Learn to Cope, 4 Court Street, Suite 110, Taunton, MA 02780
Manet Community Health Center, 1 Washington Street, Taunton, MA 02780
Plymouth County Outreach, 153 Central Street, East Bridgewater, MA 02333
SSTAR, 386 Stanley Street, Fall River 02720
Taunton Open Doors to Recovery, 61 Winthrop Street, Taunton, MA 02780
Taunton Opiate & Substance Use Task Force, 30 Olney Street, Taunton, MA 02780
Taunton Community Crisis Intervention Team, 1 Washington Street, Taunton, MA 02780

Exhibit 1

Morton Hospital

A STEWARD FAMILY HOSPITAL

March 1, 2023



Steward

Via Email

Stephen Davis, Director
Division of Health Care Facility Licensure and Certification
Department of Public Health
67 Forest Street
Marlborough, MA 01752

Re: Steward Health Care System LLC – Morton Hospital – Relocation of Morton Hospital's Comprehensive Addiction Program (MORCAP)

Dear Mr. Davis:

This letter is submitted on behalf of Steward Health Care System LLC ("Steward"), which owns and operates Morton Hospital, located at 88 Washington Street, Taunton, MA 02780 (the "Hospital"). I am the President and Chief Executive Office of the Hospital. Pursuant to 105 CMR 130.122, the Hospital hereby informs the Department of Public Health ("Department") that on or about March 30, 2023, it intends to submit a ninety-day (90) notice of the proposed relocation of Morton Hospital's Comprehensive Addiction Program (MORCAP) at the Hospital.

Steward and the Hospital understand that although it is not a technical closure, that the relocation of MORCAP to Dorchester will affect the Taunton community. As the Department is aware, in order to accomplish the relocation, there is a concurrent Transfer of Site ("TOS") filing of the MORCAP beds that will mitigate the effects of this loss. MORCAP has 32 licensed substance abuse beds and out of this 32 there are currently 18 licensed substance use disorder abuse beds currently in service. The remaining 14 beds are being utilized as med/surg beds in response to the public health emergency and authorized by DPH waivers. This means that 14 of the substance use disorder beds are temporarily out of service. The proposed Transfer of Site will move 25 substance use disorder beds to Carney Hospital to create what will be called the Carney Comprehensive Addiction Program ("CARCAP"). Of the 25 substance abuse beds that are to be relocated, 18 are in service and 7 are out of service. The remaining 7 substance use disorder beds will close permanently.

Please note that in compliance with the Department's regulations, the Hospital through separate correspondence is sending notice today to the Hospital's patient and family council, each staff member of the Hospital, and every labor organization that represents the Hospital's workforce during the period of the essential services closure process. Notice is also being sent today to the members of the General Court, as well as appropriate local elected officials. As part of this relocation, the Hospital is taking the appropriate steps to make sure that patients in the Taunton community will have seamless access to the relocated unit in Dorchester. As indicated above, the relocated unit in Dorchester will be called CARCAP at Carney Hospital but it will remain under the complete control of Morton Hospital and its substance use disorder team. Policies will be in place to ensure seamless referrals and transitions for all patients from the Taunton community. We welcome questions and engagement from the community as we prepare for the relocation of the MORCAP program.

Morton Hospital

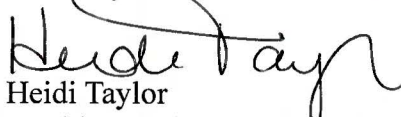
A STEWARD FAMILY HOSPITAL



Steward

Thank you for your attention to this matter. If you have any questions, please do not hesitate to contact Andrew Levine, Esq., or me.

Sincerely,



Heidi Taylor
President and Chief Executive Officer

cc: Shaunna O'Connell, Mayor of Taunton
Senator Marc R. Pacheco
Representative Carol A. Doherty
Kelly A. Dooner, Council President
E. Kelley, DPH
W. Mackie, Esq., DPH
R. Kaye, Esq., DPH
J. Bernice, DPH
S. Carlson, DPH
D. Calvert, BSAS
W. Weil, BSAS
C. Bloom, Esq.
M. Girard, M.D., Steward
N. Hibble, Esq., Steward
A. Marx, Esq., Steward
A. Levine, Esq.
V. Lobban, Steward

Exhibit 2

March 30, 2023

VIA EMAIL

Stephen Davis, Director
Division of Health Care Facility Licensure and Certification
Bureau of Health Care Safety and Quality
Department of Public Health
67 Forest Street
Marlborough, MA 01752

Re: Morton Hospital's Comprehensive Addiction Program ("MORCAP")

Dear Mr. Davis:

We write on behalf of Morton Hospital located at 88 Washington Street, Taunton, MA 02780 (the "Hospital"). Pursuant to 105 CMR 130.122(B), the Hospital hereby provides the required ninety (90) day notice to the Department of Public Health ("Department") of its proposed relocation of MORCAP to Carney Hospital in Dorchester. This letter is in follow-up to the notices that were filed with the appropriate parties on March 1, 2023. We offer the following comments with respect to this matter.

The Hospital understands that although this is not a technical closure, the relocation of MORCAP to Dorchester will affect the Taunton community. MORCAP has 32 Level 4 substance use disorder ("SUD") licensed beds, of which 18 beds are currently in service. The remaining 14 beds are utilized as med/surg beds in response to the public health emergency ("PHE") and authorized by Department waivers. This means 14 MORCAP beds are temporarily out of service. Pursuant to a separate transfer of site filing, the Hospital will move 25 of the 32 beds to Carney Hospital and operate it as a satellite of the Hospital called the Carney Comprehensive Addiction Program ("CARCAP"). Of the 25 Level 4 beds that will be relocated, 18 are currently in service and 7 are out of service. The 7 out of service beds will close permanently. The relocation of MORCAP is critical to the Hospital's ability to continue providing inpatient medical/surgical services to Taunton and the community. By relocating 25 Level 4 SUD beds, the Hospital will continue to ensure access for patients.

In compliance with applicable requirements at 105 CMR 130.122(B), the Hospital provides this written notice of the planned discontinuance of the Services, i.e., relocation of 25 Level 4 SUD beds and closure of 7 beds. The following information is hereby provided for the Department's review:

1. Utilization rates (discharges) for MORCAP services (last 3 years and YTD).

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Facility/Program	2020 ¹	2021 ²	2022	2023
Morton Hospital/MORCAP	0	74	973	114

2. A description of the anticipated impact on individuals in the Hospital's service area following the closure of the Services.

The Hospital does not anticipate a significant negative impact to patients in the service area following the relocation of 25 of the 32 Level 4 SUD-licensed beds to Carney Hospital. The Hospital will continue to manage and oversee the CARCAP services at its new location. The Hospital will provide for transportation via ambulance to CARCAP for patients presenting to Steward hospital emergency departments.

3. Date for the closure of the Services.

The closure of MORCAP will occur on or about June 27, 2023 but is subject to the coordination with Carney Hospital for the relocation and reopening of the CARCAP services.

4. Names and addresses of any organized health care coalitions and community groups known to the Hospital when the notice is issued to DPH that would have an interest in the closure of the Services.

- Community Counseling of Bristol County, 1 Washington Street, Taunton, MA 02780
- Learn to Cope, 4 Court Street, Suite 110, Taunton, MA 02780
- Manet Community Health Center, 1 Washington Street, Taunton, MA 02780
- Plymouth County Outreach, 153 Central Street, East Bridgewater, MA 02333
- SSTAR, 386 Stanley Street, Fall River 02720
- Taunton Open Doors to Recovery, 61 Winthrop Street, Taunton, MA 02780
- Taunton Opiate & Substance Use Task Force, 30 Olney Street, Taunton, MA 02780
- Taunton Community Crisis Intervention Team, 1 Washington Street, Taunton, MA 02780

¹ For service in 2020 no data is available as MORCAP was not approved by DoN until 2021.

² The service was only operational for part of 2021.

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5. A detailed account of any community engagement and planning which has occurred prior to filing notice of the closure of the Services.

The Hospital has engaged in planning with Carney Hospital for the relocation 25 beds and opening of CARCAP. The Hospital continues to engage with local stakeholders such as City Councilors, Mayors, Senators and Representatives. The purpose of such community engagement is to identify concerns with the closure of the Services in Taunton and determine how they will be addressed. The following meetings have occurred.

Taunton

- On February 24th, Heidi Taylor, (Morton Hospital, President), spoke with the following local legislators, to share intent to file the relocation plan:
Mayor O'Connell (Taunton)
Senator Pacheco
Representative Doherty
Representative Haddad
Representative Orrall
- Email communication regarding intent to file was also sent out, on February 24th and 27th: All Morton Hospital staff and providers (Feb 24th)
Morton Hospital Patient Family Advisory Committee (Feb 24th)
Morton Hospital Board of Directors (Feb 24th)
Mayor O'Connell (Taunton) (Feb 24th)
Senator Pacheco (Feb 24th)
Representative Doherty (Feb 24th)
Representative Haddad (Feb 24th)
Representative Orrall (Feb 24th)
Taunton City Council Board Members (Feb 27th)
- Email communication was sent on March 1st, as a follow up to the communication above, to confirm that Morton Hospital filed relocation plan with the Department of Public Health: All Morton Hospital staff and providers
Morton Hospital Patient Family Advisory Committee
Morton Hospital Board of Directors
Mayor O'Connell (Taunton)

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Senator Pacheco
Representative Doherty
Representative Haddad
Representative Orrall
Taunton City Council Board Members

Boston

- On February 24th, Stan McLaren (Carney Hospital, President) emailed and mailed an update regarding the initiative to relocate Morton Hospital's substance use disclosure ("SUD") treatment Program to Dorchester to the following:
Mayor Wu (Boston)
Dr. Ojikutu, Director, Boston Public Health Commission
Senator Collins
Senator Keenan
Senator Miranda
Representative Ayers
Representative Flukes-Oakley
Representative Hunt
Representative Holmes
Councilor Baker
Councilor Worrell
Councilor Louijeune
Councilor Murphy
- In addition, Mr. McLaren (Carney Hospital, President) spoke with the following officials:
Dr. Ojikutu (March 1st)
Senator Collins (February 28th)
Representative Holmes (March 9th)
Councilor Louijeune (March 7th)
Councilor Worrell (March 21st)

Morton Hospital

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Thank you for your attention to this matter. If you have any questions, please feel free to contact Andrew Levine, Esq., at 781-898-4379 or me.

Sincerely,



Heidi Taylor
President and Chief Executive Officer

cc: J. Bernice, DPH
A. Bianco, EOHHS
D. Calvert, DPH
S. Carlson, DPH
R. Kaye, Esq., DPH
E. Kelley, DPH
W. Mackie, Esq., DPH
T. McNamara, DPH
A. Mehlman, Esq., DPH
E. Weil, DPH
A. Levine, Esq.
S. McLaren, Carney Hospital, Steward
M. Girard, M.D., Steward
N. Hibble, Esq., Steward
D. Mehegan, Steward
J. Weinstein, M.D., Steward

Health Policy Commission (HPC)
Office of the Attorney General (Massachusetts)
Center for Health Information and Analysis (CHIA)
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Bureau of Substance Addiction Services (BSAS)

Community Counseling of Bristol County, 1 Washington Street, Taunton, MA 02780

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