



July 28, 2023

Anne Klibanski, MD
President and CEO
Mass General Brigham
55 Fruit Street
Boston, MA 02114-2696

SUBJECT: Mass General Brigham's Skilled Nursing Facility Collaborative

Dear Dr. Klibanski,

Dignity Alliance Massachusetts is a statewide, non-profit coalition of individuals and organizations advocating for older adults, people with disabilities, and their caregivers. By way of introduction to Dignity Alliance, we have attached a copy of our most recent annual report.

We recently became aware of Mass General Brigham's Skilled Nursing Collaborative. Dignity's interest as an advocacy organization is helping people receive the support and services for quality care that they need throughout their lives in the least restrictive appropriate setting. Therefore, a review of the Skilled Nursing Collaborative has raised concerns that all participating skilled nursing facilities in the collaborative may not be appropriate in achieving this goal or, for that matter, enhancing the world-class reputation of Mass General Brigham as a preeminent provider of quality health care.

According to the collaborative's web site, its mission, is "to ensure that patients discharged from our hospitals to skilled nursing facilities have a choice of facilities offering the highest possible quality of care." Such a statement of purpose is admirable; however, we also hope that Mass General Brigham, as an important leader in the Massachusetts health care community, gives at least equal weight to home health organizations as well as institutional care.

Before institutional post-acute care is determined to be optimal for any individual, we respectfully encourage that a range of options be discussed thoroughly with the individual and / or, when appropriate, family members or advisors. The professionals leading such a discussion should be aware of a relatively recent article in the New York Times (8/1/21) that explains the attitude of older Americans toward nursing homes.¹

¹ <https://www.nytimes.com/2021/08/01/opinion/aging-nursing-homes.html>

Additionally, *Consumer Affairs* has identified several reasons why so many older adults resist going to a nursing home.² Please also refer to the following section of the Massachusetts Advocates for Nursing Home Reform website (www.manhr.org) for further background and resources for consumers <https://manhr.org/essential-information/choosing-a-nursing-home/>.

Mass General Brigham's Skilled Nursing Collaborative states on the collaborative's web site, that, "a team of experts from Mass General Brigham selected the SNF's (Skilled Nursing Facilities) in the Collaborative based on quality measures and collaborative relationships with Mass General Brigham organizations." With that in mind, and using the comprehensive tool developed by CMS, referenced above, we have researched the quality ratings of the SNFs listed on the collaborative's web site. Nearly half of those listed do not appear to be "offering the highest possible quality of care" based on federal rating reviews.

We also call your attention to the provisions of *MGL C. 118E Section 9* (in part, *emphasis added*)³ A person seeking admission to a long-term care facility *paid for by MassHealth shall receive pre-admission counseling for long-term care services, which shall include an assessment of community-based service options*. A person seeking care in a long-term care facility *on a private pay basis shall be offered pre-admission counseling*. For the purposes of this section, pre-admission counseling shall be conducted by the executive office of health and human services or the executive office of elder affairs or their subcontractors. The executive office of elder affairs shall, in consultation with the office of acute and ambulatory care in the executive office of health and human services, study the advisability and feasibility of using certain Medicaid providers to provide pre-admission counseling. The division shall report to the general court on an annual basis the number of individuals who received pre-admission counseling under this section and the number of diversions to the community generated by the pre-admission counseling program.

In light of this provision in the laws of the Commonwealth, are you able to provide assurance that the Mass General Brigham Skilled Nursing Collaborative complies with MGL C.118E, Section 9?

Specifically, the CMS Care Compare star-rating system,⁴ while not perfect, offers some guidance to prospective nursing home residents and their families. Of the 62 skilled nursing facilities listed as participants in the collaborative, the following 27 (or 44%)

² [Pros and Cons of Nursing Homes \(2023\) | ConsumerAffairs](#)

³ <https://law.justia.com/codes/massachusetts/2012/parti/titlexvii/chapter118e/section9/>

⁴ [Five-Star Quality Rating System | CMS](#)

have been labelled with the Mass General Brigham imprimatur but are rated as average (3 star) or lower quality.⁵

One Star (3):

- Eastpointe Rehab Center, Chelsea
- Blaire House, Milford
- Marist Hill Nursing and Rehabilitation Center, Waltham

Two Star (10):

- Life Care Center of Acton
- Life Care Center of Nashoba Valley, Littleton
- Reservoir Center of Health and Rehabilitation, Marlborough
- Stone Rehabilitation and Senior Living, Newton Upper Falls
- The Ellis Nursing and Rehabilitation Center, Norwood
- Pilgrim Rehabilitation Center, Peabody
- Alliance Health at Rosewood, Peabody
- Lighthouse Nursing Care Center, Revere
- Hannah Dustin Healthcare Center, Haverhill
- Salem Rehabilitation Center (previously Advinia Care, Salem)

Three Star (14):

- Ledgewood Rehabilitation and Nursing Center, Beverly
- North End Rehabilitation, Boston
- Katzman Family Center for Living, Chelsea
- Nevins Nursing and Rehabilitation Center, Methuen
- Briarwood Rehabilitation & Healthcare Center, Needham
- Care One, Newton
- Advinia Care of Northbridge, Northbridge
- Southwood at Norwell, Norwell
- Hathorne Hill, Danvers
- Advocate Healthcare of East Boston, East Boston
- St. Patrick's Manor, Framingham
- Queen Anne Nursing Home, Hingham
- Mary Immaculate (MI) Nursing Center and Restorative Center, Lawrence
- Linda Manor Extended Care Facility, Leeds

We recommend a review to determine if facilities listed on the roster still meet the criteria for selection stated on the collaborative's web site. In addition, all facilities, including

⁵ <https://www.massgeneralbrigham.org/content/dam/mgb-global/en/patient-care/services-and-specialties/rehabilitation/Skilled-Nursing-Facility-Collaborative-Members.pdf>

those rated as four and five stars, should undergo an annual review of Care Compare ratings and be required to notify the collaborative if their rating has declined.

Attached is a listing of Dignity Alliance Massachusetts participants who have endorsed the preparation and transmission of this correspondence. We look forward to hearing from you on steps that will be taken to improve the quality of the Skilled Nursing Collaborative.

Sincerely,

Paul J, Lanzikos
Dignity Alliance Massachusetts Coordinator
Former Secretary, Massachusetts Executive Office of Elder Affairs

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Dignity Alliance Massachusetts is a state-wide, grass-roots coalition of aging and disability service and advocacy organizations and supporters dedicated to systemic transformation to ensure the dignity of older adults, people with disabilities, and caregivers. We are committed to advancing new ways of providing long-term services, support, living options, and care while respecting choice and self-determination. Dignity Alliance works through education, legislation, regulatory reform, and legal strategies to realize this vision throughout the Commonwealth.

This letter has been endorsed by 22 organizational and individual members of Dignity Alliance Massachusetts including the following:

Diana Namumbejja Abwoye, Board Chair, Our Bodies Ourselves

Boston Center for Independent Living

Center for Living & Working, Inc.

Former MA Senate President Emerita Harriet Chandler

COP Association-COPAA

Joan Daly

Disability Law Center, Inc.

Judi Fonsh MSW

Lachlan Forrow, MD

Wynn Gerhard

Arlene Germain, co-founder Dignity Alliance Massachusetts and Massachusetts

Advocates for Nursing Home Reform

Dennis Heaphy

Margaret Morganroth Gullette, Ph.D.

Ruth C. Kahn

Paul J. Lanzikos

James A. Lomastro PhD

Former MA Senate President Pro Tem Richard T. Moore

Lisa Orgettas, Disability Resource Center

Susan Rorke