

**Boston Eye Surgery and Laser Center Trust
Determination of Need Application Form
Transfer of Site**

Application Number: BESLC-20032516-TS

ATTACHMENT 1

Narrative

8. Transfer of Site

8.4 Compare the scope of the project for each element below.

In compliance with the elements set forth at 105 CMR 100.745(D) and the Determination of Need Application Form, the following detailed information is provided in connection with the proposed Transfer of Site:

Primary Service Area Towns served

Over the past 12 months, approximately 55% of the patients served at BESLC-West live in the following communities: Framingham, Newton, Waltham, Marlborough, Natick, Belmont, Watertown, Lexington, Holliston, Sudbury, Needham, Cambridge, Ashland, Hudson, Hopkinton, Wellesley, Beverly, Arlington, Peabody, Boston, Weston, Wayland, Brookline, Lynn, Chestnut Hill, Woburn, Ipswich, Northborough, Salem, and Danvers. Please see Exhibit A – Patient Analysis by Patient City (current 12 months) for a breakdown of these communities by percentage of unique patients, percentage of visits, and percentage of net receipts.

Because the Proposed Site is within approximately 1-mile of the Current Site, BESLC-West does not anticipate the Transfer of Site to result in any change to the Primary Service Area Towns served by BESLC-West. Please see Exhibit B - Map Overview of Current Site and Proposed Site.

Based on the Health Policy Commission's Bulletin on Independent Community Hospitals for Determination of Need Applicants, HPC-2021-01 issued 04/05/2021, the only "Independent Community Hospital" within the Primary Service Area is Emerson Hospital (Concord). Other community hospitals within the Primary Service Area include: Newton-Wellesley Hospital, Beth Israel Deaconess Needham, MetroWest Medical Center, and Leonard Morse Hospital. It is BESLC-West's understanding that none of the hospitals listed herein perform ophthalmological procedures.

Patient Population (Demographics)

BESLC-West anticipates that the Transfer of Site will not impact the demographics of its patient population.

Please see the following Exhibits:

- Exhibit C: Patients and Visits by Age (current 12 months)
- Exhibit D: Patients and Visits by Region (current 12 months)
- Exhibit E: Patients and Visits by Age and Insurance Plan (current 12 months)
- Exhibit F: Patients by Region and Insurance Plan (current 12 months)

Patient Access

Physical: Patient access will improve at the Proposed Site due to the physical properties of the Current and Proposed Sites. Whereas the Current Site has multiple entrances through two large medical buildings with multiple floors, which can be confusing to some patients, the Proposed Site has one main entrance with a single, defined patient drop-off area at that main entrance, which will facilitate a more streamlined point-of-access for patients and their families. Furthermore, most patients see an ophthalmologist who already has an office located at the Proposed Site, making such patients familiar with the building and layout of the Proposed Site prior to their procedure.

Price, Expenditure and Cost: As noted below, BESLC-West anticipates that the Transfer of Site will have no adverse impact on price, medical expenditure, or provider costs, and that therefore, the Transfer of Site will not adversely impact patient access with respect to these metrics.

Impact on Price

BESLC-West anticipates that the Transfer of Site will not impact price. More specifically, the facility fees charged by BESLC-West will not change. Most BESLC-West patients are Medicare patients. BESLC-West is assigned to the CMS Region 01 fee schedule for free-standing ambulatory surgery centers; the Transfer of Site will not change such assignment. With respect to commercial payors, reimbursement is based on the Commonwealth's "Statewide Rates"; the Transfer of Site will not affect such rates. Furthermore, BESLC-West does not negotiate the facility fees with any payor; rather, it accepts the CMS and commercial reimbursement for facility fees as presented by each payor on an annual basis.

Total Medical Expenditure

BESLC-West anticipates that the Transfer of Site will not impact total medical expenditure. The relocated ambulatory surgery center will meet continued demand for ophthalmological procedures by BESLC-West's patients, thereby enabling them to continue to undergo ophthalmological procedures at BESLC-West, rather than at a higher cost provider.

Provider Costs

BESLC-West anticipates that the Transfer of Site will not impact the costs associated with the surgical staff or the anesthesiology staff. The surgical staff and anesthesiology staff will remain the same at the Proposed Site, and the payor contracts will remain the same as well. For these reasons, provider costs will not change as a result of the Transfer of Site.

Description

Please see Exhibit G for a detailed description of the Current Site and the Proposed Site, including a floor plan of each. In summary, the Proposed Site is approximately 2,689 square feet larger than the Current Site (i.e., a 57% increase in floor space). That said, the number of Operating Rooms (i.e., 2 ORs) and the number of Laser Procedure Rooms (i.e., 2 LPRs) will remain the same, and therefore will not result in a change of service. The increased floor space will enable BESLC-West to implement long-term social distancing throughout many areas. An additional storage room at the Proposed Site will allow for more PPE storage, as well as increased storage for medical supplies.

8.5 Detail all Anticipated Capital Expenditures to be incurred as a result of the proposed Transfer of Site.

BESLC-West anticipates expenditures at the Proposed Site for the following new equipment in the following amounts:

- Sterilizer - \$75,000
- Pre-op and Post-op Beds - \$90,000
- Waiting Room Chairs and Furniture - \$19,000
- Desk Top Computers & Printers - \$10,000
- Computer Server - \$7,500
- Other - \$25,000

Total - \$230,415

With respect to construction, BESLC-West anticipates the following:

- Floor Plan = 7,389 square feet
- Budgeted Construction Costs = \$192.83 per square foot
- Estimated Construction Cost = \$1,424,814.06
- Cost rate for change orders = 20%

Total Estimated Construction Costs = \$1,709,776.80.

(note that this Total includes architecture fees, site development costs, permit fees, etc.)

EXHIBIT A

Patient Analysis by Patient City

BESLC West Patient Analysis by Patient City					
Visits/ Revenue from BESLC West Location					
Current Rolling 12 Mos					
Top 30 Towns	Patient City	Unique Patients	% of Unique Patients	% of Visits	% of Net Receipts
1	Framingham	235	6%	6%	7%
2	Newton	200	5%	5%	5%
3	Waltham	149	4%	4%	4%
4	Marlborough	122	3%	3%	3%
5	Natick	115	3%	3%	3%
6	Belmont	81	2%	2%	2%
7	Watertown	89	2%	2%	2%
8	Lexington	76	2%	2%	2%
9	Holliston	51	1%	1%	2%
10	Sudbury	57	1%	1%	2%
11	Needham	64	2%	2%	2%
12	Cambridge	77	2%	2%	2%
13	Ashland	55	1%	1%	1%
14	Hudson	48	1%	1%	1%
15	Hopkinton	55	1%	1%	1%
16	Wellesley	62	2%	2%	1%
17	Beverly	50	1%	1%	1%
18	Arlington	62	2%	2%	1%
19	Peabody	46	1%	1%	1%
20	Boston	41	1%	1%	1%
21	Weston	53	1%	1%	1%
22	Wayland	50	1%	1%	1%
23	Brookline	44	1%	1%	1%
24	Lynn	43	1%	1%	1%
25	Chestnut Hill	40	1%	1%	1%
26	Woburn	34	1%	1%	1%
27	Ipswich	39	1%	1%	1%
28	Northborough	29	1%	1%	1%
29	Salem	36	1%	1%	1%
30	Danvers	35	1%	1%	1%
31	All Others	1,822	46%	45%	45%
Total		3,960	100%	100%	100%

EXHIBIT B

Map Overview of Current Site and Proposed Site

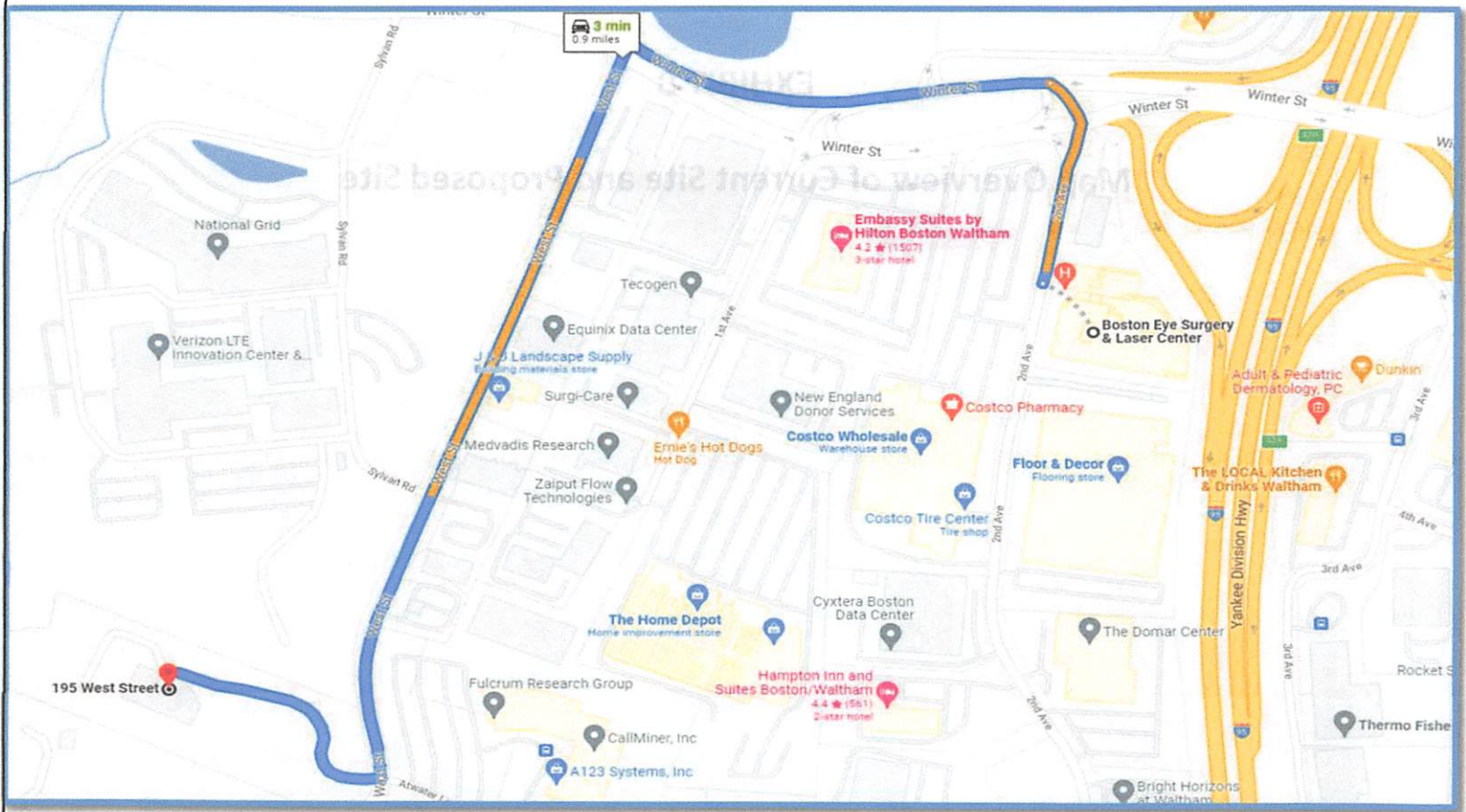


EXHIBIT C

Patients and Visits by Age

BESLC West Current 12 Mos Patients and Visits by Age		
Patient Age Range	Distinct Patients	Visits
1-50	200	241
51-60	529	707
61-70	1,391	1,993
71-80	1,428	2,087
81-90	386	548
91-100	26	38
Grand Total	3,960	5,614

Patients and Visits by Region

Patients and Visits by Region

BESLC West Current 12 Mos Patients and Visit by Region

OCB Region	Distinct Patients	Visits	Percentage of Total Visits
Waltham	1,069	1,578	27%
MetroWest	888	1,268	25%
Cambridge	390	536	8%
North Shore	322	461	8%
Out of State	269	367	7%
South Middle	198	276	5%
Western Mass	183	256	5%
Northern Region	176	243	4%
Boston	160	219	4%
North Boston	105	146	3%
Worcester	55	75	1%
South Shore	47	62	1%
South Coast	38	47	1%
Mid Cape	15	22	1%
Plymouth	17	21	0%
Upper Cape	11	15	0%
Lower Cape	9	12	0%
Islands	8	10	0%
Grand Total	3,960	5,614	100%

EXHIBIT E

Patients and Visits by Age and Insurance Plan

BESLC West		Current 12 Month	
Patients and Visits By Age and Insurance Plan			
Patient Age Range	Primary Carrier Rollup	Patients	Visits
1-50	Blue Cross	82	97
	Commercial	51	63
	Harvard Pilgrim	16	17
	Medicaid	18	23
	Medicare	5	6
	Self Pay	4	6
	Tufts	24	29
1-50 Total		200	241
51-60	Blue Cross	189	251
	Commercial	122	166
	Harvard Pilgrim	62	83
	Medicaid	75	98
	Medicare	31	43
	Self Pay	9	10
	Tufts	41	56
51-60 Total		529	707

BESLC West		Current 12 Month	
Patients and Visits By Age and Insurance Plan			
Patient Age Range	Primary Carrier Rollup	Patients	Visits
61-70	Blue Cross	230	341
	Commercial	136	194
	Harvard Pilgrim	55	74
	Medicaid	66	94
	Medicare	819	1,159
	Self Pay	35	56
	Tufts	50	75
61-70 Total		1,391	1,993
71-80	Blue Cross	53	80
	Commercial	37	49
	Harvard Pilgrim	14	18
	Medicaid	15	20
	Medicare	1,266	1,857
	Self Pay	35	48
	Tufts	8	15
71-80 Total		1,428	2,087

BESLC West		Current 12 Month	
Patients and Visits By Age and Insurance Plan			
Patient Age Range	Primary Carrier Rollup	Patients	Visits
81-90	Blue Cross	4	4
	Commercial	7	10
	Harvard Pilgrim	4	5
	Medicaid	7	9
	Medicare	353	504
	Self Pay	11	16
81-90 Total		386	548
91-100	Blue Cross	1	2
	Medicaid	1	1
	Medicare	23	34
	Self Pay	1	1
91-100 Total		26	38
Grand Total		3,960	5,614

EXHIBIT F

Patients by Region and Insurance Plan

BESLC West Current 12 Month Patients by Region and Insurance Plan

Region	Blue Cross	Commercial	Harvard Pilgrim	Medicaid	Medicare	Self Pay	Tufts	Grand Total
Waltham	144	98	53	35	675	28	36	1,069
MetroWest	113	52	31	44	596	22	30	888
Cambridge	69	28	22	14	235	9	13	390
North Shore	40	39	6	21	203	6	7	322
Out of State	39	32	9	2	173	9	5	269
South Middle	24	20	7	14	120	5	8	198
Western Mass	29	25	5	8	111	2	3	183
Northern Region	24	17	3	12	107	5	8	176
Boston	28	16	5	5	95	5	6	160
North Boston	14	10	2	18	58	2	1	105
Worcester	11	4	3	4	32	1		55
South Shore	11	5	2	2	23		4	47
South Coast	5	3		2	28			38
Plymouth	4				12	1		17

Region	Blue Cross	Commercial	Harvard Pilgrim	Medicaid	Medicare	Self Pay	Tufts	Grand Total
Mid Cape	2	1	1		11			15
Upper Cape		1	1		8		1	11
Lower Cape		1	1	1	6			9
Islands	2	1			4		1	8
Grand Total	559	353	151	182	2,497	95	123	3,960

EXHIBIT G

Current and Proposed Sites

Descriptions and Floor Plans

EXHIBIT G

Current and Proposed Sites

Descriptions and Floor Plans

EXHIBIT G

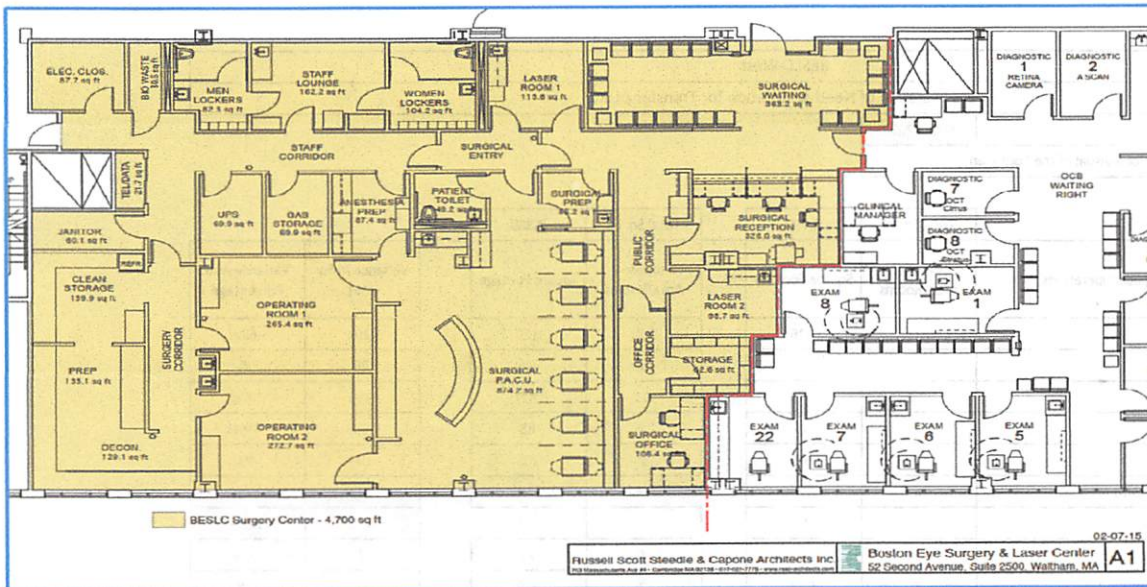
Current and Proposed Sites

Descriptions and Floor Plans

BESLC-West	
Determination of Need Application for Transfer of Site	
Updated	02.02.2022
Please see Exhibit B for a visual of the floor plan	

#	Description of Space/Operations	Total Sq. Ft.	4,700	Total Sq. Ft.	7,389	Variance In Sq. Feet	Variance As a Percentage
		Exisitng Area/Rooms	Square Footage	Proposed Area/Rooms	Square Footage		
1	Front Desk/Reception	1	326	2	122	-204	-63%
2	Business Managers Office	0.5	0	1	86	86	0%
3	Waiting Area	23	363	31	709	346	95%
4	Patient Consult Room	1	55	1	88	33	59%
5	Laser Procedure Rooms	2	205	2	205	0	0%
6	Pre-Operative & Post-Operative Area	6	874	9	1745	871	100%
7	Patient Bathrooms	1	49	2	112	63	128%
8	IT/UPS Room	1	70	1	77	7	10%
9	Operating Rooms	2	538	2	619	81	15%
10	Anesthesia Room	0.5	87	1	81	-6	-7%
11	Soiled Workroom	1	129	1	174	45	35%
12	Clean Assembly	0.5	135	1	232	97	72%
13	Clean Storage	0.5	140	1	273	133	95%
14	Storage Room	1	63	1	376	313	501%
15	Biohazard	1	31	1	34	3	11%
16	Soiled Linen	1	0	1	34	34	100%
17	Lens Room	0.5	0	1	79	79	100%
18	Staff Bathroom	1	0	2	112	112	100%
19	Men Locker	1	82	1	67	-15	-19%
20	Women Locker	1	104	1	125	21	20%
21	Staff Coat Room	0	0	1	82	82	100%
22	Breakroom	1	162	1	172	10	6%
23	Nurse Management Office	0.5	106	1	127	21	19%
	Total Rooms	48	3,521	66	5,731	2,211	63%
24	Hallyway Space		1,180		1,658	479	41%
	Grand Total		4,700		7,389	2,689	57%

Current Site



Proposed Site

