



The Commonwealth of Massachusetts
Executive Office of Health and Human Services
Department of Public Health
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DATE: February 10, 2022
VIA EMAIL: afuqua@challiance.org
Andrew M. Fuqua
General Counsel
Cambridge Health Alliance
1493 Cambridge Street
Cambridge, MA 02139

RE: Cambridge Health Alliance — Notice of Transfer of Site Application # CHA-21062311-TS

Dear Mr. Fuqua:

We are in receipt of the above-referenced Notice and its accompanying attachments, dated Dec. 13, 2021, in which the Cambridge Public Health Commission, d/b/a Cambridge Health Alliance (CHA), provided written notice to the Department of Public Health (the Department) in accordance with 105 CMR 100.745 for a proposed transfer of site of one (1) CT scanner from CHA's Somerville campus to its CHA Everett campus (Everett). CHA has complied with the requirements of Notice and has provided information sufficient to allow the Department to make a finding that the proposed transaction will neither result in a Substantial Capital Expenditure nor Substantial Change in Service, and thus will not first require a Notice of Determination of Need (DoN).

The proposed transfer of site involves two of CHA's facilities: Everett and the CHA Somerville Campus (Somerville).

Reason for Request:

CHA currently has a 16 slice CT scanner (which is over 12 years old and is out of service) located at Somerville (230 Highland Avenue/33 Tower Street, Somerville, MA 02143). CHA is proposing 1:1 replacement (which is not a DoN event) to replace this aging CT scanner with a new 64 slice CT. The Applicant seeks to relocate the right to operate a CT scanner currently located at Somerville to Everett (103 Garland Street, Everett, MA 02149) where the new 64 slice CT would be installed. The existing CT scanner occupies approximately 570 gross square feet at Somerville. This scanner will be located in an existing space in the Everett imaging suite that is approximately 420 gross square feet.

Currently, CHA has a total of four (4) CT scanners, with three (3) in its Cambridge/Somerville facilities (2 scanners at Cambridge and 1 scanner, which needs replacing and is currently offline, at Somerville) and one (1) at Everett available to the campus' outpatients, hospital inpatients, and emergency department patients. The proposed transfer will address this imbalance and enable CHA to better meet the needs of the historically underserved communities of Malden, Chelsea, Revere, and Everett. When operational, the out of service 16-slice CT scanner at Somerville is available only for outpatient services as services at that location include ambulatory care, urgent care, and inpatient psychiatry. Following the proposed transfer, CHA will continue to meet patient need for outpatient CT services within 2 miles at CHA Cambridge.

Everett currently has a single 64-slice CT scanner to cover urgent and emergent CT service needs of the ED, inpatients, and outpatients. Transferring the right to operate the CT scanner to Everett would enable uninterrupted CT availability for patients at the facility's high volume emergency department. Currently, when its CT scanner is unavailable, Everett must transfer patients needing an urgent CT scan to Cambridge or another facility, which negatively impacts patient experience, particularly for the critically ill. Overall CT visit volume is much higher at Everett than at Somerville: from FY2016 to FY2020, Everett had between 10,917 and 11,832 annual CT visits, while Somerville had between 1,388 and 2,581. Moreover, a second CT at Everett will improve access for outpatients needing diagnostic tests and other treatments. The second CT will reduce the instances when outpatient patients are bumped by urgent/ED patients and allow for more timely and reliable scheduling of patients.

Location and Location Change:

Somerville's primary service area comprises Somerville, Cambridge, and a portion of Medford, while Everett's primary service area comprises Malden, Chelsea, Revere, and Everett. According to the applicant, the change of site will improve access to CT imaging services for CHA's patients. If CHA were to site the new scanner at Somerville, it would be available only for outpatient services duplicative of those provided at nearby CHA Cambridge (located on the Somerville-Cambridge city line, less than two miles from Somerville).

Patient Population Served:

Although geographically adjacent, there are significant distinctions between the patient populations served by Somerville and Everett. The cities of Cambridge and Somerville, served by Somerville, are significantly more affluent than the communities served by Everett (Malden, Chelsea, Revere, and Everett). Indeed, the rates of unemployment and child poverty are lower in Somerville's service area. Additionally, the communities served by Everett are more ethnically and racially diverse and have a higher proportion of immigrants. Finally, the communities served by Everett have worse health outcomes than Cambridge and Somerville (in particular, substance-related mortality, cancer mortality, major cardiovascular disease mortality, and COPD-related hospitalizations).

Impact on Health Care Spending:

The applicant states that the Proposed Transfer will have no impact on the price it charges for CTs. CHA currently provides CT services at its inpatient hospital facilities, and all pricing will remain consistent with current charges. Additionally, the applicant states that the Proposed Transfer will not affect or perhaps reduce total medical expenditures, because the transfer will ensure that patients needing CT scans at Everett can receive them at CHA instead of at a higher-cost provider. Moreover, according to the applicant, the transfer will reduce transportation costs.

In its application narrative, CHA states that the proposed transfer of site would cost \$2.45m, including construction/renovation of space to accommodate the CT at Everett (\$1,275,500), equipment for the CT scanner (\$1,050,000), and architectural and engineering costs associated with renovations (\$124,500).

Sufficient Interest in the Proposed Site:

The Applicant states that Everett is appropriately zoned to provide medical services, including CT imaging services. CHA owns a portion of Everett and leases the remaining portion from the City of Everett pursuant to a 99-year lease expiring in 2095.

Findings:

The Department finds that CHA has provided the Department with the information required in 105 CMR 100.745(D). Based upon review of the Notice and supporting materials, the Department finds that this transaction does not require a DoN either as a Substantial Capital Expenditure or Substantial Change in Service, pursuant to 105 CMR 100.730, and that CHA may move forward with the proposed changes in the designated locations.

Sincerely,

Margret R. Cooke
Commissioner