March 29, 2021

Ms. Lara Szent-Gyrogyi, Director Determination of Need Program Department of Public Health 250 Washington Street, 6<sup>th</sup> Floor Boston, MA 02108

RE: Formation of a Ten Taxpayer Group and Party of Record to the Mass General Brigham (MGB) Determination of Need Application MGB- 20121716-HE

Dear Director Szent-Gyrogyi:

I write to register the undersigned as a Ten Taxpayer Group (TTG) and Party of Record to the Mass General Brigham (MGB) Determination of Need Application MGB 20121716-HE with a filing date of February 12, 2021. These taxpayers are acting on behalf of Center for Diagnostic Imaging (CDI) located at 200 Providence Hwy., Suite 210 Dedham, MA 02026.

The TTG respectfully requests that public hearings be held on this Application. Additionally, we strongly encourage the Department of Public Health to require an independent cost analysis (ICA) pursuant to 105 CMR 100.405(D) and M.G.L. c. 111, § 25C(h) for each of these Applications to provide additional information as to whether these Proposed Projects are consistent with the Commonwealth's cost containment goals. In order for the ICA to be truly independent and unbiased, we recommend that the Health Policy Commission (HPC) conduct the analysis at the Applicant's expense, or at a minimum, the Department work closely with HPC staff to select an independent third party, establish the scope of the ICA, and review the ICA prior to the Department's acceptance thereof. As part of the review, we respectfully suggest that the ICA consider the implications of this individual Application as well as the other MBG DoN Applications (20121612-HEand 2102113-AS) collectively.

The Taxpayer designated to be the recipient of all communication concerning the Application is, Bethany Allen. All materials can be sent to <a href="mailto:Bethany.Allen@cdirad.com">Bethany.Allen@cdirad.com</a>.

Thank you in advance for your attention to this matter.

Sincerely,

**Bethany Allen** 

**Chief Technologist** 

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