



February 28, 2025

Determination of Need Program
Massachusetts Department of Public Health
250 Washington Street, Boston, MA 02108
Sent via E-mail to: DPH.DON@massmail.state.ma.us

To DoN Staff and the Public Health Council:

On behalf of the 80,000+ members of the Massachusetts Division of 1199SEIU, we write to offer these comments relative to the on Determination of Need Application DFCI-23040915-HE as submitted by the Dana-Farber Cancer Institute, Inc (DCFI). Additionally, these comments are submitted by the 1199SEIU Ten Taxpayer Group formed to represent the interests of the more than 15,000 nurses, unlicensed assistive personnel, service, maintenance, clerical, professional and technical worker members of the Massachusetts division of 1199SEIU who work in acute care settings across the commonwealth.

We continue to have some concerns about this application and the proposed construction of a new 300-bed adult inpatient hospital facility. With these written comments, we are reiterating concerns that have not been adequately addressed by the Applicant or in the recommended conditions for approval outlined in the Determination of Need Staff Report. We want to emphasize our concerns about potential workforce impacts and to outline the kind of workforce initiatives that we think are most meaningful and effective to develop, recruit, and retain a skilled and diverse workforce of 2,400 FTEs at a 300-bed inpatient facility.

Before detailing our outstanding concerns, 1199SEIU would like to thank the DoN Staff, the Applicant, and the ICA analysts for investigating in more detail whether and how a facility such as that which is being proposed might pull patients from safety net hospitals in metro Boston and potentially across the state. It is critical to examine whether the proposed new facility might constitute a financial threat to the survival of these hospitals, which are themselves economic engines and social anchors in their communities. The analyses that were undertaken here — especially when complemented by the very comprehensive analysis performed by the Health Policy Commission in its preliminary Cost and Market Impact Review — provide some good baseline data about cancer care in Eastern Massachusetts. **1199SEIU requests that, as a condition of approval, DFCI enable ongoing analysis by doing some additional reporting on both patient referrals and demographics, as well as on the backfilling of former oncology beds at both Brigham and Women's Hospital and at Beth Israel Deaconess Medical Center.**

1199SEIU continues to have substantial concerns about the implications of a new 300-bed facility for the already-strained healthcare workforce in the Commonwealth. DFCI seems to have some programs and pipelines in place to encourage and support training and recruitment of doctors and nurses. Although the Applicant indicates that the anticipated 2,400 FTEs will include jobs in *"administrati[on], clinical, nursing, support services, radiation oncology, imaging, lab services, pharmacy, [and] management/supervision, etc."*, nothing is mentioned about recruitment or

workforce development programs, such as the Registered Apprenticeship programs provided by the 1199SEIU Training and Upgrading Fund, which provide true wrap-around support for workers to enter or advance in healthcare jobs. The 1199SEIU TUF RA program has worked hand-in-hand with employers to create work-based training programs for workers to become Phlebotomists, Rad Techs, CNAs, Medical Coders, Community Health Workers, and Patient Care Technicians. The TUF RA program is a grant-funded program that has the potential to work with any healthcare employer to help fill hard-to-fill jobs.

To have true success in recruiting a diverse workforce from *“underrepresented populations from Boston’s historically marginalized communities,”* workers must receive free training as well as stipends, childcare, transportation, equipment such as laptops, money for licenses and books, and so on. Employers must offer career ladders that inspire novice healthcare workers to see a future in the healthcare field. And employers must provide workers with the space and opportunity to have a voice on the job, either through a labor union or by other means.

In conclusion, 1199SEIU asks the Department of Public Health Determination of Need Program to condition approval of the DFCI application on implementation of worker-centered training opportunities and reporting about numbers trained and services provided.

Thank you for your time and attention to this important matter.

Sincerely,

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