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Massachusetts Department of Public Health  
Determination of Need Program  
250 Washington St., 6th floor  
Boston, MA 02108

To: Massachusetts Department of Public Health, Determination of Need Program  
Re: Medford Surgery Center, LCC Application

*[Note: These comments reflect an updated version of my spoken remarks at the August 22, 2018, Public Hearing.]*

Good evening. My name is Ellyn Boukus and I live right behind the Courtyard Nursing Home. I'm glad to be able to participate tonight and engage as a member of the community. That is what I'd like to focus my remarks on tonight: Community Engagement.

So far, there has been a severe lack of community engagement and transparency from Wellforce and their partner entities in this process.

The DoN application asks the applicant to provide evidence of "**sound Community Engagement and Consultation throughout the development of the proposed project.**" I think many of us here and at last week's meeting probably agree that there has been virtually none of the above.

The DoN application is 375 pages long. Out of 375 pages, barely 1-and-a-half are devoted to describing evidence of Community Engagement. The applicant gives 2 examples of sound community engagement.

1. A presentation to Melrose Wakefield Healthcare's Patient Family Advisory Committee (PFAC) back on February 27. According to the DoN application, "...as approximately 89% of the proposed ASC volume will originate from MWH it was decided that the PFAC would best represent patients from the proposed service area." Not surprisingly, the proposal was received positively: these are people who would benefit from additional services without bearing the negative effects because they are not members of the local community.

2. The second piece of evidence cited (amounting to one small paragraph) was an April meeting here in this building, which only 9 community members attended. Again, not surprising, at last week's City Hall

meeting, an informal audience poll showed that most neighbors were unaware of the project until recent weeks.

In my opinion, 1. engaging with a completely different community and 2. engaging with residents in a most cursory way does not strike me as “**sound**” Community Engagement. It strikes me (at best) as doing the bare minimum to check boxes on a form and (at worst) as an intentional end-around the people who will be most impacted by the project.

The Community Engagement guidelines published by DPH on the DoN website show a spectrum of engagement that ranges from “Inform” at the lowest level to “Community Driven” at the highest level of community engagement. If I were grading Wellforce’s Community Engagement efforts so far, I would give it an F. If I were writing a Yelp review, I’d give 0 stars if I could. The efforts described don’t even rise to the bare minimum level of “Inform,” given that most neighbors were not aware of the proposal until very recently, and only through small news blurbs and word-of-mouth.

I would please ask that, starting now, Wellforce hit the reset button and begin to engage with the local community in a truly robust way. Please listen to our concerns and work with us. Take those DPH guidelines to heart. We don’t just want to be barely informed.

We want to be

- Consulted
- Involved
- Collaborators
- Empowered

We want to move along the spectrum toward the highest level of Community Engagement.

I also strongly recommend that the Massachusetts Department of Health reject the Medford Surgery Center LLC’s application. The applicant has failed to adequately explain why they cannot repurpose the existing hospital structure or select a different site in an appropriately zoned area. They have also failed to provide any information about longer-term plans for a so-called “Medical Village.”

Medford may represent a small percentage of the ASC’s expected volume, but we are 100% of the people who are bearing the brunt of these changes, and we deserve better.