

April 24, 2025

Dennis Renaud, Director, Determination of Need Program Massachusetts Department of Public Health 67 Forest St., Marlborough, MA 01752

DPH.DON@massmail.state.ma.us

Re: Determination of Need Application UMMH-25021208-HE Registration of Ten Taxpayer Group (TTG)

Dear Mr. Renaud,

Pursuant to the provisions of 105 CMR. §§ 100.100 and 100.435, please accept the following request for the registration of a TTG relative to Determination of Need (DoN) Application UMMH-25021208-HE for a substantial change in service and substantial capital expenditure to develop a Proton Therapy Service at the UMass Memorial Medical Center Cancer Center at Marlborough. Please note the following:

- 1. The name and resident address of each TTG member is attached.
- 2. Each TTG member is a resident of the Commonwealth of Massachusetts and is subject to any Massachusetts state income, excise or property tax during 2025, the year in which the Application was filed.
- 3. The representative of the Marlborough Hospital Medical Staff TTG designated to be the recipient of all written communications concerning the Application relative to this request is Vibha Sharma, MD. All materials can be sent to vibha.sharma@umassmemorial.org

We have discussed the DoN Application with the Applicant and are in support of UMass Memorial Health's plans to develop a Proton Therapy Service at the UMass Memorial Medical Center Cancer Center at Marlborough.

The need for investment in advanced cancer care therapies and technologies continues to grow, particularly in Central Massachusetts where population growth and cancer diagnoses are increasing. Proton therapy is a highly effective and proven cancer treatment that improves the precision of radiation in targeting tumors and reduces potential damage to healthy tissue in the body. This significantly reduces the acute/chronic side effects of treatment.

For years across all of New England, proton therapy has been exclusively offered at Massachusetts General Hospital (MGH), which was one of the first providers of proton therapy in the United

States. Due to their international reputation and the scarcity of proton therapy centers in New England, the MGH facility is consistently at capacity. Accordingly, MGH has been selective about accepting patients for proton therapy treatment, focusing on pediatric patients, skull-based tumors, and other limited disease sites where tumor targets abut normal tissue.

Due to persistent full capacity at MGH, distance to travel, insurance barriers, and inherent process-driven delays in starting therapy, proton treatment has been less available to our patients in Central Massachusetts who require daily treatment. Currently, those patients who can access treatment are faced with the added burden of traveling many miles from home. The inability to refer patients locally for timely care can result in adverse health effects and outcomes.

UMass Memorial Health aims to reduce the burden of accessing state-of-the-art cancer care for individuals and their families by offering proton therapy in Marlborough. Developing a proton therapy service in Marlborough will improve patient outcomes and wellbeing, as well as address the existing financial and geographic disparity between patients who can access proton therapy in Boston and those who cannot.

We, the undersigned taxpayers, are acting as agents on behalf of Marlborough Hospital Medical Staff, Marlborough Hospital, 157 Union Street, Marlborough, MA 01752

Thank you for your attention to this matter.

Sincerely,

Vibha Sharma, MD

Associate Chief Medical Officer

UMass Memorial Health - Marlborough Hospital

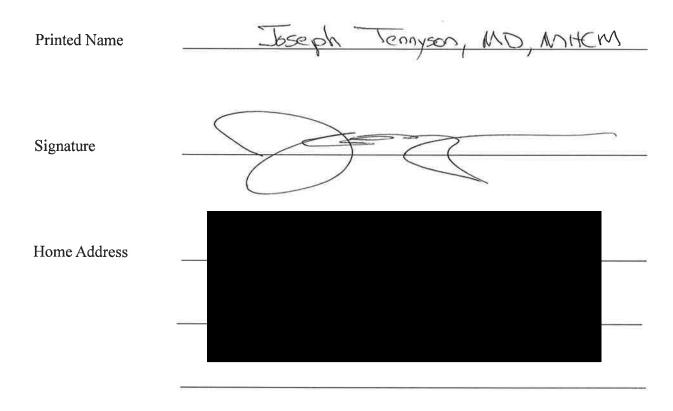
I am signing below as a member of the Marlborough Hospital Medical Staff Ten Taxpayer Group regarding Determination of Need Application UMMH-25021208-HE for a substantial change in service and substantial capital expenditure to develop a Proton Therapy Service at the Cancer Center in Marlborough.

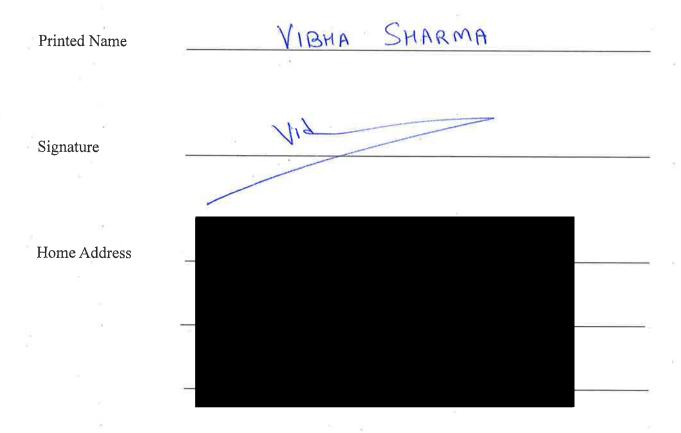
Printed Name

Christ opher Mashall

Signature

Home Address





I am signing below as a member of the Marlborough Hospital Medical Staff Ten Taxpayer Group regarding Determination of Need Application UMMH-25021208-HE for a substantial change in service and substantial capital expenditure to develop a Proton Therapy Service at the Cancer Center in Marlborough.

Printed Name

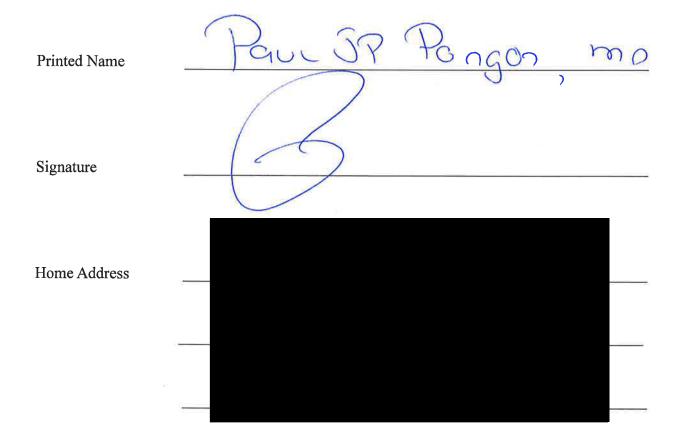
CHARLES CAVAGNARO, MD

Signature

Charles Cavagura to m

Home Address

Printed Name	Kimberly A. Robinson MD, MPH
Signature	* KR
Home Address	
Home Address	



Printed Name	Mark B. Davidson, MD		
Signature	Who &	m	
Home Address			

Printed Name	CHANDRIUA JAIN
Signature	- lubhwh
Home Address	

Printed Name	Apeksha Tripathi MD MPH
Signature	A.Trepathi, MD MPH
Home Address	
	A Sec

Printed Name	Selvana Takla
Signature	Savanna Tak Ca
Home Address	