



GREAT FUTURES START HERE.



VIA EMAIL DPH.DON@MassMail.State.MA.US

Lara Szent-Gyorgyi
Director, Determination of Need Program
Massachusetts Department of Public Health
250 Washington Street, 6th Floor
Boston, MA 02108

Dear Ms. Szent-Gyorgyi:

Thank you for accepting input from Central Massachusetts community members about Mass General Brigham's proposal to establish an outpatient center in Westborough. We write to you today on behalf of YWCA Central Massachusetts and Boys & Girls Club of Worcester.

YWCA Central Massachusetts has served our region for over 135 years and is dedicated to eliminating racism, empowering women and promoting peace, justice, freedom and dignity for all. As a multi-service organization with a mission centered in advancing equity, we have significant concerns about how this proposal could worsen existing health disparities that we, and many community organizations are working to eradicate.

As one of the largest youth development agencies in Central Massachusetts, Boys & Girls Club provides mentoring, programs, and services that support young people and help them reach their full potential. Advancing equity in our city is critical to our mission to help youth, especially those who need us most, develop the qualities needed to become responsible citizens and community leaders.

As two organizations who serve thousands of families in our community, we are increasingly worried that MGB's expansion into Westborough will deepen existing health and economic inequities that disproportionately affect the youth and families we serve. Eighty percent of our youth are living at or below the poverty line, and many of them benefit from the essential health and wellness services provided by our local health systems. The outpatient center in Westborough proposed by our state's most expensive healthcare system is not easily accessible to residents of low-income communities. It targets mostly affluent, predominantly white, mobile, and commercially insured people already served by local providers.

While Central Massachusetts' most privileged residents migrate to MGB in Westborough, the new facility will be difficult to reach for those living in low-income communities with barriers to health care.

In addition to leaving the needs of many residents behind, the proposal threatens access to existing high-quality care for people who are insured by public programs, such as Medicare or Medicaid, or people who are uninsured. Siphoning commercially insured patients away from High Public Payer hospitals and health systems puts enormous financial pressure on our local providers who provide essential safety net care. Although they will continue to

serve all of their patients, these providers may need to reduce or close much-needed medical services or programs for our communities' most vulnerable residents.

To accurately understand the impact of this proposal on health equity in Central Massachusetts, we respectfully ask that the Department of Public Health require another public hearing on this application. This would be most informative for our communities if held after conducting an independent cost analysis. Furthermore, we would ask the Department to require the Health Policy Commission, which is focused on improving health equity across the state, to conduct this analysis.

YWCA Central Massachusetts and the Boys & Girls Club of Worcester appreciate your attention to this important issue, and we look forward to hearing more from the DPH in the months ahead.

Sincerely,



Linda Cavaioli
Executive Director
YWCA Central Massachusetts



Liz Hamilton
Executive Director
Boys & Girls Club of Worcester

From: [Yu](#)
To: [DPH-DL - DoN Program](#)
Subject: DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS
Date: Monday, April 12, 2021 4:10:35 PM

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

As a local resident, I support Mass General Brigham's project to provide the same healthcare I receive today in Boston closer to my home. We need more access to care in our community – especially behavioral health, which this site will provide.

My name is Yu Chen, a resident of Westborough. I support the MGB set up a care center at Westborough. Other than my personal reasons there are three more reasons from the points of the community.

1. Westborough has more and more elderly people and more above 55 residential house buildings. These are people who most need to access the best medical care.
2. UMass, Marlborough, Union hospital are all 30 mins away by driving not 10 or 20 mins as most people said.
3. Westborough residents should have the chance and right to chose the best medical services in the country. We should welcome the MGB care center for the benefit of Westborough and surrounding towns residents and ask the Department of Public Health to approve this application.

Yu
sscytc315@gmail.com
Westborough

From: [Yousef](#)
To: [DPH-DL - DoN Program](#)
Subject: DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS
Date: Friday, April 16, 2021 4:59:36 PM

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As a local resident I find it concerning that I'm not given a choice in my local health care providers. How is it fair, that based on where I live, my care options (less than 45 minutes) are being restricted to UMass or Milford when my care provider for years is attempting to locate closer to me? The savings in time (driving), money (gas, tolls, wear and tear on my car) and the environmental benefits (of less commuting) would be hugely beneficial to me, my family and the environment. If we were truly concerned about the patient interests, we should allow them the choice that exists in any other market based service. Let the patients chose where to seek their care, not vested competitor or political interests.

Yousef
sef.ghanem@gmail.com
Hopkinton

From: [Ying](#)
To: [DPH-DL - DoN Program](#)
Subject: DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS
Date: Friday, April 16, 2021 9:33:30 AM

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As a local resident, I support Mass General Brigham's project to provide the same healthcare I receive today in Boston closer to my home. We need more access to care in our community – especially behavioral health, which this site will provide.

The project will also provide much needed jobs, including 300 union construction jobs and 200 permanent jobs, that will help our local economy emerge from the pandemic.

I support the Mass General Brigham project and ask the Department of Public Health to approve this application.

Ying
cathyzyzy@gmail.com
Hopkinton

From: [Wei Mao](#)
To: [DPH-DL - DoN Program](#)
Subject: MGB Westborough
Date: Friday, April 09, 2021 5:33:09 PM

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Please consider this email for support of the above locating to Westborough MA. The more healthcare options the better. Freedom of choice. Thank you.

MGB Expansion
Public Hearing
April 6, 2021

My name is William Fischer and I am a resident of the City of Marlborough. I am currently a member of the UMass Memorial – Marlborough Hospital Board of Trustees and I am the former co-chair of the hospital's Patient and Family Advisory Council.

But I am here tonight to speak to you as the voice of a patient. I, along with members of my family, friends, neighbors and business colleagues have been, or are, patients at Marlborough Hospital or UMass Memorial. The hospital and the health care system has served the residents of this community for many, many years.

I, personally, and as a member of the board of trustees, am very concerned about the impact the MGB expansion into Westborough will have on the hospital and the community.

I would like to take a moment to detail my interaction with Marlborough Hospital as a Patient.

I had a Heart Attack in 2001 and was rushed to the Emergency Department at Marlborough Hospital. They quickly diagnosed my condition and stabilized me. They transferred me to the UMass Memorial Campus in Worcester, for a catheterization procedure which showed multiple blocked arteries. I had a Triple By-Pass operation the next day, and thanks to the dedicated caregivers at UMass Memorial Health Care I am very healthy today. I wanted to share my experiences during this and subsequent hospitalizations at Marlborough Hospital, so I volunteered for the Patient and Family Advisory Council, to help enhance the Patient Experience, and the experience of Families of Patients as well. The PFAC has focused on the underserved individuals in our community, to make sure that the services of the hospital are available to everyone. My fellow PFAC Members and I are concerned that these individuals

might not be able to get treatment for their illness or injury, if their current safety-net was disrupted, since UMass Memorial – Marlborough is a safety-net hospital. Additionally, the healthcare providers who have cared for me so well over the years could also be in jeopardy due to the highly competitive market that could result due to the MGB expansion. As a Patient, I am extremely concerned with the MGB expansion efforts.

As a hospital trustee, I have become very familiar with the cost of health care and the struggles safety net hospitals like Marlborough Hospital and UMass Memorial Health Care have in the very, very highly competitive Massachusetts health care market. The proposed MGB expansion into the MetroWest region will be extremely disruptive, costly and will threaten the services that are provided to patients who rely on safety net hospitals and/or have difficulty accessing health care that is not close by or accessible by public transportation. This is a big concern for me and my colleagues on the board of trustees. If safety net hospitals like Marlborough and UMass Memorial Medical Center lose any volume of commercially insured patients to MGB, we will be forced to make some serious business decisions that could ultimately impact the patients who are the core of our mission.

Tonight, I am asking the Department of Public Health to deeply explore and evaluate the proposed MGB expansion project to determine if there truly is a need for this? Or is this a duplication of services currently being offered, what the cost will be, and if it will be equitable for all of the residents of this community.

Please pursue an independent cost analysis and please continue to hold public hearings about this expansion project.

Thank you.

From: [Vineet](#)
To: [DPH-DL - DoN Program](#)
Subject: DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS
Date: Monday, April 05, 2021 8:03:51 PM

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As a local resident, I support Mass General Brigham's project to provide the same healthcare I receive today in Boston closer to my home. I am especially interested because the facility will be closer to home, and will also be part of the overall Mass General Brigham system. In particular, I am interested in having my primary care provider being part of Mass General Brigham system.

The facility will provide world class care at a lower cost, and also will create local jobs. I am interested in it because my wife works in the healthcare field.

I support the Mass General Brigham project and ask the Department of Public Health to approve this application.

Best regards,
Vineet Nene

Vineet
vvnene@yahoo.com
Hopkinton, MA

From: [Vanzandt, Katherine](#)
To: [DPH-DL - DoN Program](#)
Subject: MGB expansion into Westborough
Date: Tuesday, April 13, 2021 11:01:55 AM

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Director, Determination of Need Program
Massachusetts Department of Public Health
250 Washington Street, 6th Floor
Boston, MA 02108

Dear Ms. Szent-Gyorgyi:

Thank you for the opportunity to comment on Mass General Brigham's (MGB) plans to expand into Central Massachusetts and establish an outpatient center in Westborough.

My name is Katherine Van Zandt and I am a nurse practitioner at Marlborough Hospital. I have been proud to care for residents of Westborough, Marlborough, and Central Massachusetts for over a year at the Marlborough Hospital and as part of the UMass Memorial Healthcare system at large for over 3 years. Our local hospital and health system is a longstanding community resource, providing emergency care as well as a range of inpatient and outpatient medical, surgical and ancillary services.

As a provider committed to delivering high-quality care at exceptional value, I am deeply concerned that MGB's Westborough proposal will threaten our essential local care institutions and exacerbate health inequities in our region. MGB is choosing to expand into high-income communities that are already well-served by existing providers, rather than into communities in need of quality care options. There are 13 health facilities within a 10-minute drive of the proposed site which provide the same services as those planned for MGB's ambulatory care facility. Furthermore, there are 47 health provider locations, including three

hospitals and an ambulatory surgery center, only 20 minutes away from the Westborough site.

Introducing MGB's ambulatory services into one of our region's most affluent areas without demonstrated need will siphon commercially insured patients away from lower-cost, High Public Payer hospitals and health systems such as our own. This would disrupt the balanced payer mix that enables local health systems to maintain operations and make outstanding care accessible for all, regardless of ability to pay. As a result, I fear that community providers could be forced financially to reduce services, raise commercial insurance rates, or do some combination of the two – worsening health disparities that our community providers are working hard to address.

I believe in and welcome competition, but it must be *fair* competition. By duplicating pre-existing services in our community without demonstrated demand, MGB will be establishing competition for the sake of competition to the detriment of patients.

To further examine this proposal's effect on local care and health equity, I respectfully request that the Department of Public Health require the applicant to hold another public hearing, after the completion of an independent cost analysis. To ensure it is truly independent, I also ask the Department to require that the Health Policy Commission conduct the independent cost analysis.

Thank you for your attention to this important matter.

Sincerely,

Katherine Van Zandt, MSN, ACNP

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From: [Tricia](#)
To: [DPH-DL - DoN Program](#)
Subject: DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS
Date: Monday, April 12, 2021 10:08:10 AM

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As a local resident, I support Mass General Brigham's project to provide the same healthcare I receive today in Boston closer to my home. We need more access to care in our community – especially behavioral health, which this site will provide.

The project will also provide much needed jobs, including 300 union construction jobs and 200 permanent jobs, that will help our local economy emerge from the pandemic.

I support the Mass General Brigham project and ask the Department of Public Health to approve this application.

Tricia
tpierson@comcast.net
Westborough

484 Main Street, Suite 300
Worcester, MA 01608-1880

Fax: 508-757-2712
www.unitedwaycm.org



Lara Szent-Gyorgyi
Director, Determination of Need Program
Massachusetts Department of Public Health
250 Washington Street, 6th Floor
Boston, MA 02108

Dear Ms. Szent-Gyorgyi:

Thank you for the opportunity to express our significant concerns about Mass General Brigham's plans to expand into Central Massachusetts and establish an outpatient center in Westborough.

For over 100 years, the United Way of Central Massachusetts has connected people and resources to ensure our communities have access to quality healthcare, adequate nutrition, and opportunities for physical activity. Safety Net services are at the core of our mission, and have helped more than 100,000 individuals experiencing conditions that create vulnerability with programs such as food distribution, family shelters and disaster relief

We are fortunate to have UMass Memorial Health Care as an incredible community partner in advancing this work, particularly as we respond to the novel coronavirus pandemic. As part of our collaboration in the Worcester Together COVID-19 Fund initiative, UMass Memorial set up crucial mobile testing sites in high-risk neighborhoods to ensure residents could access appropriate diagnostic and follow-up care. One year later, the organization continues to play a critical role caring for our region and addressing health inequities exacerbated by COVID-19. Our local health system is also a longstanding supporter of our youth programming to promote recreation, activity, education and healthy relationships for underserved young people in Worcester.

As an organization committed to breaking the cycle of poverty, we are deeply concerned about Mass General Brigham's proposed Westborough expansion and its potential to weaken how our region cares for our most vulnerable residents. We believe that these plans are likely to worsen existing health disparities that the United Way of Central Massachusetts has spent decades working to address.

The proposed site, located in one of Central Massachusetts' most affluent areas, is not easily accessible to residents of low-income communities with barriers to healthcare. It will draw patients with commercial health insurance away from low-cost local providers like UMass Memorial Medical Center, which rely on that care to subsidize high-quality services for people with Medicaid or Medicare as well as those who are uninsured.

We know our local safety net providers will continue to serve our most vulnerable residents, even if they lose patients to MGB. However, we fear for their financial stability and worry they may be forced to close or reduce much-needed medical services that are a cornerstone of building healthy communities and dismantling health disparities.

In order to better understand the impact of MGB's proposal, we respectfully request that the Department of Public Health require another public hearing on this application after an independent cost analysis has been conducted. To ensure this analysis is truly independent, we ask the Department to require that the Health Policy Commission - which has committed itself to creating a more equitable health care system in Massachusetts - conduct it.

Thank you for your consideration as you evaluate this important issue and how it may shape the future of health care in our communities.

Sincerely,

L

<signature on file>

Tim Garvin
President and CEO
United Way of Central Massachusetts

From: [Travis Perry](#)
To: [DPH-DL - DoN Program](#)
Subject: Mass General Westboro Proposal
Date: Thursday, April 08, 2021 11:28:03 AM

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To Whom It May Concern,

I would like to voice support for the proposed Mass General facility in Westboro. As a patient of Mass General, I can attest the care and technology is light years ahead of other central Mass hospital systems. Please bring Mass General to MetroWest for the benefit of the patients that need an elevated level of expertise and care.

Regards,

Travis Perry
Vice President, Commercial Lending
Millbury Federal Credit Union
Richard N. Kenary Building
50 Main St
Millbury MA 01527

[REDACTED]
[REDACTED]

email: tperry@mcucommercialservices.com

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From: [James](#)
To: [DPH-DL - DoN Program](#)
Subject: DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS
Date: Saturday, April 03, 2021 11:26:16 AM

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As a local resident, I support Mass General Brigham's project to provide the same healthcare I receive today in Boston closer to my home. We need more access to care in our community – especially behavioral health, which this site will provide.

The project will also provide much needed jobs, including 300 union construction jobs and 200 permanent jobs, that will help our local economy emerge from the pandemic.

I support the Mass General Brigham project and ask the Department of Public Health to approve this application.

James
jetashjian@tashsim.com
Westborough

From: [Janet Wilder](#)
To: [DPH-DL - DoN Program](#)
Subject: Determination of Need ("DoN") Application Project #21012113-AS – Mass General Brigham -- Opposed
Date: Thursday, April 15, 2021 9:12:40 PM

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Dear DPH,

My name is Taryn Harding and I have worked in the Ultrasound Department at Marlborough Hospital for 4 years. I am opposed to the Mass General Brigham expansion, particularly at the Westborough location. If they were to proceed with the expansion, it would most certainly put our community hospital in jeopardy of closing down or greatly reducing services. We provide patient and family-centered care to so many local individuals. I love working in the same community in which I live! Losing my job would be incredibly detrimental to my family. We have three young children. If I had to eventually get a different job, I would have a longer commute (which would steal even more valuable time with my children). We would incur increased childcare costs as well. This would be the case for many of my colleagues who also live locally and are dedicated to serving our community. Our lives are improved by my job and the community at Marlborough Hospital, and I don't want people to lose that.

Taryn L. Harding
48 Florence Street
Hudson, MA 01749

From: [Margaret](#)
To: [DPH-DL - DoN Program](#)
Subject: DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS
Date: Monday, April 12, 2021 4:08:46 PM

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Good morning,

My name is Margaret Szybillo. I am a Referral Services Clinician for Partners Healthcare at Home.

I live in Hudson, MA and Westborough is less than 10 minutes away from my home.

I was beyond thrilled to learn of MGB's proposed facility in Westborough!

As I am sure you are aware, the closest MGB hospital to our Metrowest area is Newton Wellesley.

Having an MGB facility in Westborough will certainly help to streamline our continuity of care for our patients living in this area.

I have many friends and neighbors who regularly drive into BWH or MGH for a vast array of care, including chemotherapy. The commute for them can be overwhelming, but they continue to make the trip because of the outstanding care they receive. How nice it would be for them to be closer to home, especially in the winter months or during rush hour when it can take up to 2 hours to get "into town".

I also believe that having MGB healthcare in this area will allow us to better serve our most vulnerable patients with expanded services such as our Partners Mobile Observation Unit (PMOU), our MGH/BWH Home Hospital program, and our Partners Healthcare at Home. These critical services are not currently offered to our patients in this area, as Westborough and its surrounding towns are beyond our current service area.

Finally, I have many friends and former coworkers who would love to be a part of our MGB family, but are reluctant to do so simply because of the commute.

I sincerely hope that the Massachusetts Department of Public Health allows MGB/Partners to expand our service area to better serve our patient population.


Thank you for allowing me the opportunity to show my support to such an important project!

Thank you,

Peggy

Margaret Szybillo LPN
Partners Healthcare at Home
781-290-4200

Margaret Szybillo, LPN
Referral Services Clinician
Partners Healthcare at Home
281 Winter Street Suite 240
Waltham, MA 02451


Fax: 781.290.4250

mszybillo@partners.org | www.partnersathome.org

I support the Mass General Brigham project and ask the Department of Public Health to approve this application.

Margaret
mrsszyb@gmail.com
Hudson

From: [Susan](#)
To: [DPH-DL - DoN Program](#)
Subject: DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS
Date: Friday, April 09, 2021 7:48:32 AM

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The project will also provide much needed jobs, including 300 union construction jobs and 200 permanent jobs, that will help our local economy emerge from the pandemic.

I support the Mass General Brigham project and ask the Department of Public Health to approve this application.

Susan
rslukas@verizon.net
Hopkinton

Written and oral testimony against proposed MGB Westboro outpatient clinic – April 6, 2021

Susan Mailman
Owner and President
Coghlin Electrical Contractors
Worcester, MA 01605

My name is Susan Mailman, I own Coghlin Electrical Contractors in Worcester MA. We are a union shop and have employed thousands over the course of my 35 year career.

As a Central MA employer I am keenly aware of ever our growing health care costs. The emergence of the highest cost healthcare system in our state would be a very bad outcome for employers. It's certain that MGB is trying to expand their commercial base of patients, by expanding to wealthier suburbs thereby by stripping patients from very important local physician and hospital groups that live within much more modest cost structures and have excellent outcomes.

There is no demand for this facility as there are 13 health care facilities within a 10 minute drive of the proposed site providing the same services as MGB's proposal, within 20 minutes there are 47 health provider locations. Local jobs will be put in jeopardy with this expansion. My experience as a board member of Reliant Medical Group for nine years and now U Mass Memorial Health care for the past two years has further informed my thinking on this issue.

We've all become educated during the pandemic in the most painful way about health equity issues. The MGB expansion into Central MA would exacerbate the disparities in our region. These locations are not easily accessible to residents of low income communities, and as already stated the MGB target is the wealthier, predominantly white commercially insured populations. Outrageous for the Dept. of Public Health to even consider this expansion. I served on the board of Reliant Medical Group for 9 years and now serve on U Mass Memorial hospital board and understand the cost implications of this build in our region.

There should be additional public hearings, to allow more to be heard on this issue and that should happen AFTER an independent cost analysis has been conducted. The Health Policy Commission should be the ones conducting the study – you should then reconvene additional public hearings.

This is a critical issue for our region. We are very concerned – please do not approve this Determination of Need.



VIA EMAIL DPH.DON@MassMail.State.MA.US

Lara Szent-Gyorgyi
Director, Determination of Need Program
Massachusetts Department of Public Health
250 Washington Street, 6th Floor
Boston, MA 02108

Dear Ms. Szent-Gyorgyi:

Thank you for the opportunity to share my concerns about Mass General Brigham's (MGB) plans to expand into Central Massachusetts and establish an outpatient center in Westborough.

My name is Dr. Anatoly Sukharsky, and I am a radiologist and Chief Executive Office with MetroWest Radiology Associates. I am proud to serve patients from Westborough and surrounding communities for almost 15 years.

Our local health systems are critical to providing our residents with high-quality, affordable care. I believe that MGB's expansion into Westborough will threaten the financial viability of these essential community institutions.

MGB's proposed ambulatory services for our region target high-income communities with a disproportionate share of commercially insured patients who are already well served by local providers. The potential expansion will likely siphon away these patients from lower-cost, High Public Payer community hospitals and health systems, which need commercial insurance payments to counterbalance drastically lower reimbursements from government programs.

Losing a substantial number of commercial patients to MGB will disrupt the balanced payer mix that enables local health systems to maintain operations and deliver high-quality care to MassHealth patients, people living in poverty, and patients affected by health inequities. This could force community providers to reduce services, raise commercial insurance rates, or do some combination of the two.

Furthermore, there is not enough community demand to warrant MGB's expansion into Westborough, contradicting the goals of our state's Determination of Need process. There are many health facilities within close proximity of the proposed site that provide the same services as those intended for MGB's ambulatory care facility.

The Determination of Need process was established to encourage the appropriate allocation of healthcare resources. MGB's proposed services are not only redundant, but far more expensive than the high-quality services existing in our communities today.

Thank you for hearing the voices of local, concerned providers in the greater Westborough area and thank you for your time on this matter.

Sincerely,

Anatoly Sukharsky, MD

Anatoly Sukharsky, MD
Chief Executive Office, MetroWest Radiology Associates



VIA EMAIL DPH.DON@MassMail.State.MA.US

Lara Szent-Gyorgyi
Director, Determination of Need Program
Massachusetts Department of Public Health
250 Washington Street, 6th Floor
Boston, MA 02108

Dear Ms. Szent-Gyorgyi:

Thank you for the opportunity to share my concerns about Mass General Brigham's (MGB) plans to expand into Central Massachusetts and establish an outpatient center in Westborough.

My name is Dr. Anatoly Sukharsky, and I am the President of the Board of Directors, of the MetroWest Health Care Alliance Physician Organization. On behalf of our organization, which represents over 200 independent and employed providers, across all specialties and primary care, we are sending a letter of concern.

Our local health systems are critical to providing our residents with high-quality, affordable care. We believe that MGB's expansion into Westborough will threaten the financial viability of these essential community institutions upon which our doctors and patients depend.

MGB's proposed ambulatory services for our region target high-income communities with a disproportionate share of commercially insured patients who are already well served by local providers. The potential expansion will likely siphon away these patients from lower-cost, High Public Payer community hospitals and health systems, which need commercial insurance payments to counterbalance drastically lower reimbursements from government programs.

Losing a substantial number of commercial patients to MGB will disrupt the balanced payer mix that enables local health systems to maintain operations and deliver high-quality care to MassHealth patients, people living in poverty, and patients affected by health inequities. This could force community providers to reduce services, raise commercial insurance rates, or do some combination of the two.

Furthermore, there is not enough community demand to warrant MGB's expansion into Westborough, contradicting the goals of our state's Determination of Need process. There are many health facilities within close proximity of the proposed site that provide the same services as those intended for MGB's ambulatory care facility.

The Determination of Need process was established to encourage the appropriate allocation of healthcare resources. MGB's proposed services are not only redundant, but far more expensive than the high-quality services existing in our communities today.

Thank you for hearing the voices of local, concerned providers in the greater Westborough area and thank you for your time on this matter.

Sincerely,

Anatoly Sukharsky, MD

Anatoly Sukharsky, M.D., President



Board Members:

Paulo Andre, M.D. (Neurology)

Fouad Aoude, M.D. (Internal Medicine)

Christopher Cua, M.D. (Thoracic Surgery)

Angela Hunt, M.D. (Pediatrics)

Louis Jurist, M.D. (Hand Surgery)

Jay Krasner, M.D. (Internal Medicine)

Renata Martin, M.D. (Family Medicine)

Karthik Ravindran, M.D., Clerk/Treasurer (Internal Medicine)

Steven Spiegel, M.D., Vice President (Nephrology)

Howard Sussman, M.D. (Cardiology)

Brian Whitehouse, M.D. (General Surgery)

From: [steven](#)
To: [DPH-DL - DoN Program](#)
Subject: DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS
Date: Friday, April 09, 2021 3:04:28 PM

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The project will also provide much needed jobs, including 300 union construction jobs and 200 permanent jobs, that will help our local economy emerge from the pandemic.

I support the Mass General Brigham project and ask the Department of Public Health to approve this application.

steven
brnstvn@aol.com
Berlin

 **UMass Memorial Health**
MARLBOROUGH HOSPITAL
157 UNION STREET
MARLBOROUGH, MA 01752

 **UMass Memorial Health**
HEALTHALIANCE - CLINTON HOSPITAL
60 HOSPITAL ROAD
LEOMINSTER, MA 01453

April 15, 2021

Lara Szent-Gyorgyi
Director, Determination of Need Program
Massachusetts Department of Public Health
250 Washington Street, 6th Floor
Boston, MA 02108

Dear Ms. Szent-Gyorgyi :

As President of UMass Memorial Health Marlborough Hospital, I, am very concerned about the negative impacts we foresee on Marlborough Hospital and UMass Memorial Healthcare if Mass General Brigham opens an outpatient center in Westborough.

First, I would like to give you some background about Marlborough Hospital:

- Marlborough Hospital has served this community for over 130 years and has cared for hundreds of thousands of patients since that time.
- We are dedicated to providing our patients with high quality, easily accessible and compassionate care.
- We have received national recognition from organizations such as the Leapfrog Group and CMS star quality rankings. We were recently named a national top 100 hospital in the Low Institute rankings for providing outstanding and safe care at a lower cost.
- We serve as a critical safety net facility for the MetroWest region.
- Our hospital is classified by the state as a High Public Payor Community Hospital because over 60% of our patients are insured by a public program, such as Medicare or Medicaid, or are uninsured.

Specifically, let me share my concerns as to the impact the proposed center would have on the hospital, our caregivers and our patients:

Competitive Concerns:

- MGB's expansion into Westborough will destabilize the local healthcare market and threatens our viability as a hospital, and UM M's viability as a health system.
- We are seriously concerned that MGB's unnecessary and duplicative expansion may cause Marlborough Hospital to close certain critical services or our doors entirely, negatively impacting access to care for our most vulnerable patients across the region . This could include our Emergency Department and our Behavioral Health Unit.

- Loss of commercial commercially insured patients to MGB will impede our ability to counterbalance financial challenges incurred from being a safety net provider.
 - All hospitals are substantially underpaid by MassHealth and other safety net payors, often in the range of only 60 to 65 cents on the dollar of cost.
 - To remain fiscally afloat, safety net systems like Marlborough Hospital must counterbalance these losses with other revenue, including commercial insurance.
 - Local health providers' safety net losses won't decrease if commercial payers migrate to MGB - they'll increase. MGB is not locating any of its outpatient clinics in high need locations. So, with smaller commercial volume, community health systems will be forced to seek higher commercial rates to counterbalance their losses or else face the unwelcome prospect of reducing services.
 - This will impact our service lines with the lowest reimbursement rates most acutely - including behavioral health.
- If Marlborough Hospital is robbed of our ability to safely care for all of our patients, the negative impacts will reverberate throughout our entire region.

Cost Concerns:

- The price differences between Marlborough Hospital and MGB are staggering. As a case study with data published by CHIA, for outpatient services in suburban settings covered by Blue Cross Blue Shield of Massachusetts, MGB's services are 32% more expensive than Marlborough Hospitals'. Under some insurance plans (Tufts), MGB's prices for outpatient services can be 77% more expensive than outpatient services offered by Marlborough Hospital.
- MGB has a track record of merging, acquiring or pushing out community healthcare systems and then pricing services at a higher cost, increasing the financial burden placed upon patients throughout the Commonwealth.
- The prospect of MGB charging absurd rates here is unacceptable and it should be unacceptable to those business providing insurance for their employees - as they will be funding this.

Health equity concerns:

- The proposed MGB sites target higher income, predominantly white, mobile, commercially insured populations already served by existing providers.
- The locations are not easily accessible to residents of low-income communities with barriers to health care, leaving access and the needs of many residents behind.
- Marlborough Hospital's financial viability is critically important to the community. If we are unable to provide high-quality, affordable care to our most vulnerable, they will be left with no choice but to go further for care or go without, both of which are untenable .

Concerns as an employer:

- There is a finite need for healthcare. Healthcare services made redundant by MGB's proposed expansion will subsequently reduce the patient base and profitability of established local practitioners, threatening job loss among nurses, office administrators and others within the local medical community.

In closing, **we must protect community care.** Residents of the communities Marlborough Hospital serves have had access to both outpatient and inpatient healthcare that is high quality, safe and easily accessible and are provided by skilled and compassionate care givers:- I am here today to communicate to you the incredible threat the MGB expansion poses to our healthcare community. I am requesting that the DPH have the Health Policy Commission conduct a truly independent cost analysis of the MGB project and that additional public hearings be held after the independent cost analysis has been released.

Thank you.



<signature on file>

Steve Roach

President

UMass Memorial Health - Marlborough Hospital

UMass Memorial Health - HealthAlliance-Clinton Hospital

From: [stephen](#)
To: [DPH-DL - DoN Program](#)
Subject: DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS
Date: Saturday, April 03, 2021 11:23:47 AM

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As a local resident, I support Mass General Brigham's project to provide the same healthcare I receive today in Boston closer to my home. We need more access to care in our community – especially behavioral health, which this site will provide.

The project will also provide much needed jobs, including 300 union construction jobs and 200 permanent jobs, that will help our local economy emerge from the pandemic.

I support the Mass General Brigham project and ask the Department of Public Health to approve this application.

stephen
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Westborough