

harry miller <myvoice@oneclickpolitics.com>

Tue 6/1/2021 1:34 AM

To:

DPH-DL - DoN Program;

Re: Please Support Mass General Brigham!

Dear Department of Health,

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.

Sincerely,  
harry miller  
millerjarry@gmail.com  
143 south st. NORTHBOROUGH, MA 01532 Constituent

pushyami ch <myvoice@oneclickpolitics.com>

Tue 6/1/2021 12:06 AM

To:

DPH-DL - DoN Program;

Re: Please Support Mass General Brigham!

Dear Department of Health,

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.

Sincerely,  
pushyami ch  
chillarigepushyami@gmail.com  
turnpike road WESTBOROUGH, MA 01581 Constituent

MGB Public Comment- Westborough batch 12

henry kasperowicz <myvoice@oneclickpolitics.com>

Mon 5/31/2021 11:51 PM

To:

DPH-DL - DoN Program;

Re: Please Support Mass General Brigham!

Dear Department of Health,

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.

Sincerely,

henry kasperowicz

phillyforever61@outlook.com

27 patricia road MARLBOROUGH, MA 01752 Constituent

MGB Public Comment- Westborough batch 12

elissa roderick <myvoice@oneclickpolitics.com>

Mon 5/31/2021 10:12 PM

To:

DPH-DL - DoN Program;

Re: Please Support Mass General Brigham!

Dear Department of Health,

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.

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

Sincerely,  
elissa roderick  
elissa1214@verizon.net  
25 spring ter SHREWSBURY, MA 01545 Constituent

MGB Public Comment- Westborough batch 12

ellen wilkin <myvoice@oneclickpolitics.com>

Mon 5/31/2021 8:03 PM

To:

DPH-DL - DoN Program;

Re: Please Support Mass General Brigham!

Dear Department of Health,

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.

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

Sincerely,  
ellen wilkin  
ellenw505@icloud.com  
142 main st UPTON, MA 01568 Constituent

MGB Public Comment- Westborough batch 12

Daniel <cdm6366@gmail.com>

Mon 5/31/2021 2:05 AM

To:

**DPH-DL - DoN Program;**

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.

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

Daniel  
cdm6366@gmail.com  
Marlborough

MGB Public Comment- Westborough batch 12

lynn waugh <myvoice@oneclickpolitics.com>

Sun 5/30/2021 10:40 PM

To:

DPH-DL - DoN Program;

Re: Please Support Mass General Brigham!

Dear Department of Health,

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.

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

Sincerely,

lynn waugh

lynnwaugh07@gmail.com

242 union ave FRAMINGHAM, MA 01702 Constituent

MGB Public Comment- Westborough batch 12

mary burns <myvoice@oneclickpolitics.com>

Sun 5/30/2021 7:27 PM

To:

DPH-DL - DoN Program;

Re: Please Support Mass General Brigham!

Dear Department of Health,

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.

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

Sincerely,  
mary burns  
grammab31@aol.com  
211 purchase street MILFORD, MA 01757 Constituent



MGB Public Comment- Westborough batch 12

wendy tibbals <myvoice@oneclickpolitics.com>

Sun 5/30/2021 10:39 AM

To:

DPH-DL - DoN Program;

Re: Please Support Mass General Brigham!

Dear Department of Health,

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.

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

Sincerely,  
wendy tibbals  
wendytibbals@outlook.com  
4 vinal HUDSON, MA 01749 Constituent

MGB Public Comment- Westborough batch 12

wendy collazo <myvoice@oneclickpolitics.com>

Sun 5/30/2021 3:59 AM

To:

DPH-DL - DoN Program;

Re: Please Support Mass General Brigham!

Dear Department of Health,

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.

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

Sincerely,  
wendy collazo  
wendicollazo1@gmail.com  
66 dinsmore ave FRAMINGHAM, MA 01702 Constituent

MGB Public Comment- Westborough batch 12

lori capezzuto <myvoice@oneclickpolitics.com>

Wed 6/2/2021 5:24 AM

To:

DPH-DL - DoN Program;

Re: Please Support Mass General Brigham!

Dear Department of Health,

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.

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

Sincerely,

lori capezzuto

purpledolphin2724@gmail.com

17 claflin st MILFORD, MA 01757 Constituent

MGB Public Comment- Westborough batch 12

michele bazinet <myvoice@oneclickpolitics.com>

Wed 6/2/2021 5:15 AM

To:

DPH-DL - DoN Program;

Re: Please Support Mass General Brigham!

Dear Department of Health,

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.

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

Sincerely,  
michele bazinet  
nanagram4@yahoo.com  
47 davis st NORTHBOROUGH, MA 01532 Constituent

MGB Public Comment- Westborough batch 12

joi grzyb <myvoice@oneclickpolitics.com>

Wed 6/2/2021 5:13 AM

To:

DPH-DL - DoN Program;

Re: Please Support Mass General Brigham!

Dear Department of Health,

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.

Sincerely,

joi grzyb

jazzy6887@icloud.com

67 tyler park WESTBOROUGH, MA 01581 Constituent

Parulkar, Bhalchandra <Bhalchandra.Parulkar@tenethealth.com>

Wed 6/2/2021 5:05 AM

To:

DPH-DL - DoN Program;

Parulkar, B.G. <B.G.Parulkar@umassmemorial.org>;

**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.**

Lara Szent-Gyorgyi  
Director, Determination of Need Program  
Massachusetts Department of Public Health  
250 Washington Street, 6<sup>th</sup> 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 Bhalchandra Parulkar and I am a urologist at Marlborough Hospital and St Vincent Hospital. I have been proud to care for residents of Westborough, Marlborough, Worcester and Central Massachusetts for 28 years.

I live in Northborough and my family and friends receive their care in the St Vincent hospital system and in the U mass Medical healthcare system seamlessly

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.

The local residents who choose to take their care to MGB centers have chosen voluntarily to do so. If MGB wanted to facilitate and make their services available to them they could easily choose to open an outpatient center in Newton Wellesley where they already have a hospital or Milford hospital where they already have a cancer center. Both these communities are within 15 minute drive from Westborough.

A large number of senior , underserved and bilingual patients do not have insurances that are accepted in all Boston healthcare setups and they land up getting their care in St Vincent, u mass and Marlborough hospital. During emergencies that occur in the evening and night and on weekends the existing MGB patients will not have access to their MGB doctors and will have to travel to Boston for their care. Similarly after surgery or procedures in the new center if there are complications these patients will expect care in local emergency rooms which will cause interrupted care as the MGB surgeon will operate on the patient and whole new team from U MASS or St Vincent will be expected to care for the local patients. In all Surgery centers the doctors are expected to have privileges at local hospitals and provide rotating coverage for the patients in the emergency rooms. From what we understand, the MGB center does not plan to have their physicians obtain privileges at local hospitals and provide emergency room coverage and be available for all insured and uninsured patients regardless of their background or ability to pay.

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,

Bhalchandra Parulkar, MD  
Urologist  
Marlborough Hospital and St Vincent Hospital

MGB Public Comment- Westborough batch 12

nancy watson <myvoice@oneclickpolitics.com>

Wed 6/2/2021 4:09 AM

To:

DPH-DL - DoN Program;

Re: Please Support Mass General Brigham!

Dear Department of Health,

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.

Sincerely,

nancy watson

fritowatson@gmail.com

183 south quinsigamond ave SHREWSBURY, MA 01545 Constituent



MGB Public Comment- Westborough batch 12

nancy petrie <myvoice@oneclickpolitics.com>

Wed 6/2/2021 3:55 AM

To:

DPH-DL - DoN Program;

Re: Please Support Mass General Brigham!

Dear Department of Health,

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.

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

Sincerely,

nancy petrie

nancynancy256@aol.com

75 south st apt c SHREWSBURY, MA 01545 Constituent

MGB Public Comment- Westborough batch 12

Kathleen <kathyrkat42@yahoo.com>

Wed 6/2/2021 3:15 AM

To:

**DPH-DL - DoN Program;**

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

Kathleen  
kathyrkat42@yahoo.com  
Marlborough

Grecchi, Max <Max.Grecchi@umassmemorial.org>

Wed 6/2/2021 12:59 AM

To:

DPH-DL - DoN Program;

**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.**

To whom it may concern,

I am writing in concern and opposition to the Mass General Brigham (MGB) expansion as it endangers Safety Net Care systems, as well as disadvantaged patients from the regions indicated.

Dr. Dickson, president and CEO from UMass Memorial Care, elaborated best in the 5 points below;

**1. Endangered Safety Net Care:** To remain fiscally afloat, safety net systems like UMass Memorial (*which serves the majority of MassHealth patients in the region*) must counterbalance these losses with other revenue, including commercial insurance. As the primary safety net provider in the region, losing a substantial number of commercial patients to MGB would seriously impede UMMC fiscal viability, forcing **Safety Net Care** systems to either increase commercial rates and/or reduce services.

**2. Health Equity:** With the nationwide focus on racial/ethnic disparities and social injustice, UMMC is particularly concerned with the health disparities impact of the MGB site in Central Mass. *Health disparities could be exacerbated in two ways:*

- The proposed MGB Westborough site is easily accessible for higher income, predominantly white, commercially insured populations already served by existing providers. However, the location is not easily accessible to residents of low-income communities with barriers to health care.
- Marlborough Hospital is classified by the state as a High Public Payor Community Hospital because over 60% of its patients are insured by a public program such as Medicare or Medicaid or are uninsured. It will continue to serve those patients even if its commercial volume is negatively impacted by MGB, but fiscal viability will be compromised by its decreased ability to counterbalance financial losses from safety net care with commercial revenue. UMass Memorial Medical Center would suffer similar consequences as more commercial patients are referred to MGB's Boston hospitals for specialized care. This will drive the dynamic described above of being forced to make drastic decisions – and the impact of any reduction of services would be particularly felt by the most vulnerable patients in Central Mass.

**3. Location and Need:** The proposed MGB facility is centered among towns where median incomes are in the highest 20% statewide, and residents are mostly commercially insured and are already amply served by multiple providers. Within 20 minutes of the Westborough site, there are already 47 health care provider locations (*including hospitals, clinics and outpatient practices*) and there are 13 within 10 minutes.

**4. Higher Cost:** Hospital pricing in the MGB system is 20% higher than in the UMass Memorial Health Care system, and its physician pricing is 19% higher. An MGB expansion would drive up the cost of care in two ways and would, therefore, likely drive up insurance costs for local employers and employees:

- The MGB clinic's cost of care would be higher than nearby providers, which would increase costs of care as patients migrate from existing local providers; *and*
- When outpatient clinic patients are referred for specialized inpatient care, it will be to MGB hospitals in Boston that are substantially higher cost than any other hospital in the state.

**5. Reduced Economic Growth in the Region:** While MGB's proposal suggests that it will offer more jobs in the area (would employ 220), Westborough is not a medically underserved location. Because there is a finite need for health care in the immediate area, this clinic's size and number of caregivers are likely to result in loss of volume (*and therefore loss of jobs*) for other local community providers. The impact does not stop there; by reducing the volume of referrals to UMass Memorial Medical Center and sending them instead to other MGB hospitals in Boston, it will grow business in Boston while reducing business in Worcester. Over time, this could impact prospects for economic development and job growth for our region.

This opposition is not because of any ill will toward MGB or due to fear of the competition. MGB is a great health system, and competition with other healthcare systems is welcome, **as long as it is fair**. This potential project puts Safety Net Care systems at an unfair disadvantage, but more importantly, it puts the most vulnerable patients of central Mass at an even more unfair disadvantage to gain access to high-quality care.

Thank you for taking into consideration the public's comments in this important matter,

**Max Grecchi**

*Coordinator of Education and Training*

*Interpreter Services Office*

*UMass Memorial Medical Center*



*55 Lake Ave North*

*Worcester, MA 01655*



**President/CEO**  
Stephen J. Kerrigan

**Board Chair**  
Valerie Zolezzi-Wyndham

**Serving**  
Central Massachusetts & MetroWest

**Locations**  
Worcester | Framingham | Milford

May 28, 2021

VIA EMAIL [DPH.DON@State.MA.US](mailto:DPH.DON@State.MA.US)

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

***Re: Determination of Need (DoN) 21012113-AS; MGB Construction and Development of Three Ambulatory Care Centers***

Dear Ms. Szent-Gyorgyi:

Thank you for this opportunity to offer written testimony on behalf of Edward M. Kennedy Community Health Center (Kennedy Community Health) in relation to the above-referenced application.

The mission of Kennedy Community Health is to “help people live healthier lives.” We believe that everyone has a right to accessible, high quality, comprehensive, integrated and compassionate health care. Founded in a Worcester housing project as the Great Brook Valley Health Center in 1972, today Kennedy Community Health has three medical facilities serving residents of Worcester, Framingham, Milford, and the surrounding communities of MetroWest and Central Massachusetts. Currently nearly 29,000 patients of all ages receive care and service through Kennedy Community Health’s family practice model of care.

As a leading provider of outpatient services to the most vulnerable residents of Central Massachusetts and MetroWest, we uphold in practice the principal that *all* residents of the Commonwealth, irrespective of wealth, should have access to healthcare services. This ideal is reflected in the laws of the Commonwealth relating to the Determination of Need process, which direct DPH to ensure “that health care services will be made *reasonably available to every person within the commonwealth* at the lowest reasonable aggregate cost” (Mass. General Laws, Chapter 111, section 25C). Reasonable availability of health services to all residents of Massachusetts must include access to the entire range of health services, including inpatient, specialty and other services provided primarily by safety net hospitals.

The viability of safety net hospitals is an urgent public policy issue nationally. As detailed in a new PBS *Frontline* documentary, market forces have deepened America’s healthcare divide.

This is evidenced by the vast disparity in fiscal stability between hospital systems that serve large numbers of publicly insured or uninsured patients versus those that largely serve commercially insured. As described by Dr. Bruce Siegel, President and CEO of America's Essential Hospitals, which represents more than 300 safety-net hospitals around the country, "I think we're on the brink of a precipice." With that in mind, we at Kennedy Community Health believe it is critical that, in assessing MGB's proposal, DPH thoroughly analyze the potential impact it may have on the fiscal viability of this region's safety net hospitals. Safety net hospitals rely upon revenue from commercially insured patients to cross-subsidize losses they sustain from being paid rates from public payers that are below the cost of providing care (especially from Medicaid). Losing commercial volume could substantially impact their fiscal viability and potentially raise the unwelcome prospect of forcing them to consider service reductions.

MGB is proposing its Westborough facility in a location that is easily accessible to high-income, commercially insured patients who are already served by local providers. But it is distant from low-income communities and is not easily accessible by public transportation. This raises the likelihood that it will draw commercially insured patients away from existing local hospitals, while largely leaving safety net care in their hands. Due to this risk, it is imperative that DPH conduct a thorough analysis of the likely effect MGB's expansion will have on safety net providers. Integral to this analysis is considering external evidence such as MGB's statements to an investors' conference about this project's goal to increase network lives and commercial referral volume, as well as the sheer size of the facility it is proposing in Westborough in contrast to the size of its present patient panel. Only through such a thorough analysis can DPH make a reasonably informed determination of the proposal's impact upon the statutory objective to make health services reasonably available to every person within the Commonwealth

Thank you for your attention to this important issue and the opportunity to offer these comments.

Sincerely,  
<signature on file>  
Stephen J. Kerrigan  
President & CEO

[larry brown <myvoice@oneclickpolitics.com>](mailto:myvoice@oneclickpolitics.com)

Tue 6/1/2021 9:29 AM

To:

DPH-DL - DoN Program;

Re: Please Support Mass General Brigham!

Dear Department of Health,

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.

Sincerely,

larry brown

[misfitlarry815@gmail.com](mailto:misfitlarry815@gmail.com)

16 fountain street MILFORD, MA 01757 Constituent

MGB Public Comment- Westborough batch 12

colby fichtel <myvoice@oneclickpolitics.com>

Tue 6/1/2021 5:23 AM

To:

DPH-DL - DoN Program;

Re: Please Support Mass General Brigham!

Dear Department of Health,

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.

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

Sincerely,

colby fichtel

colbyfichtel@gmail.com

275 boston post road east MARLBOROUGH, MA 01752 Constituent



MGB Public Comment- Westborough batch 12

[lisa murphy <myvoice@oneclickpolitics.com>](mailto:myvoice@oneclickpolitics.com)

Tue 6/1/2021 5:16 AM

To:

DPH-DL - DoN Program;

Re: Please Support Mass General Brigham!

Dear Department of Health,

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.

Sincerely,

lisa murphy

[lisamurphy6448@gmail.com](mailto:lisamurphy6448@gmail.com)

1630 worcester rd FRAMINGHAM, MA 01702 Constituent

MGB Public Comment- Westborough batch 12

james hashem <myvoice@oneclickpolitics.com>

Wed 6/2/2021 4:53 PM

To:

DPH-DL - DoN Program;

Re: Please Support Mass General Brigham!

Dear Department of Health,

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.

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

Sincerely,  
james hashem  
jameshashem6@gmail.com  
42broad HUDSON, MA 01749 Constituent

MGB Public Comment- Westborough batch 12

bruna silva <myvoice@oneclickpolitics.com>

Wed 6/2/2021 4:28 PM

To:

DPH-DL - DoN Program;

Re: Please Support Mass General Brigham!

Dear Department of Health,

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.

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

Sincerely,

bruna silva

bruna.oak.c@gmail.com

1620 worcester road FRAMINGHAM, MA 01702 Constituent

Marilyn Leeds <[myvoice@oneclickpolitics.com](mailto:myvoice@oneclickpolitics.com)>

Wed 6/2/2021 4:24 PM

To:

DPH-DL - DoN Program;

Re: Testimony: Mass General Brigham Incorporated – Multisite - 21012113-AS

Dear Ms. Szent-Gyorgyi,

My name is Marilyn Leeds. I appreciate this opportunity to share my concerns with the Department of Public Health regarding MGB's proposed expansion plans and the establishment of outpatient centers including the one in Westborough, MA.

I am currently employed by UMass Memorial Medical Center. I served as the Assistant Director from 1981-1998 and have now served as Administrative Director of Graduate Medical Education at UMass Medical School since 1998. In those roles, I have come to appreciate the importance of UMMC to the Medical School and to Central Massachusetts and the impact the proposed expansion will have.

In 1975, (PL 93-641) mandated the establishment of Health Systems Agencies across the country to make recommendations on the appropriateness of expanded health care services and capital projects. The major intent of the law was to provide local direction and control of health care planning. When Federal resources dedicated to this process were phased out under the Reagan administration, control of planning ceded to the State DPH as it is currently. The importance of local control in these critical policy decisions, however, should not be disregarded and I would urge you to consider local voices.

I served as the Senior Planner for Ambulatory Care at the Central Mass HSA from 1978-1981 and worked to ensure that the introduction of costly new services and systems would not severely impact the balance of affordability and access to health care. In that role, I reviewed Determination of Need applications in Central Massachusetts. Those that were determined to negatively impact access to care and also affordability were routinely denied. This was not about "protecting the turf" of any institution or institutions, but rather protecting the community at large.

There is no question that the rise of UMass Medical School and the growth of the Medical Center have significantly improved local access to high quality clinical services though not without increased cost. Tertiary care services and a major trauma center cannot be maintained without a strong hospital bottom line. To its credit, however, UMass has balanced its growth in Central Massachusetts with its commitment to core missions of service to the community and to the education of physicians and especially primary care providers. If that bottom line is jeopardized – as it will be by the proposed expansion of MGB beyond the western suburbs of Boston – it also endangers the core missions of UMass Memorial Medical Center.

In fact, the argument I'm making today is the same argument that the deans of the Boston medical schools and leadership of the Boston teaching hospitals made when they "supported the establishment of the State medical school anywhere but Boston" in the 1960s. Their challenges to an additional medical school in Boston due to concerns about a lack of demand have been documented.

While increased access to care is a laudable goal of the proposed expansion of MGB beyond the western suburbs of Boston into Central MA, increased control of the health care marketplace by this powerful provider will negatively impact affordable access to care and medical education in Central Massachusetts. The negative impact on UMMMC finances will impact critical outreach and support services that UMMMC provides to the community, including a large low-income population and disenfranchised residents of the Worcester community. The diversion of patients to Boston for hospital care will also severely impact patient volume that is essential for training UMMS medical students and resident physicians. The mission of the school, which provides affordable medical education with a focus on primary care, may be compromised.

In light of these considerations, I would like to request that the Department of Public Health require the Health Policy Commission to conduct the independent cost analysis to ensure that there is a truly fair evaluation of need, and that additional public hearings be scheduled for after the analysis has been finalized. Based on the information provided to date, the CMHSA would have been unable to recommend support of this proposed expansion. Thank you.

Sincerely,  
Marilyn Leeds  
marilyn.leeds@umassmed.edu  
16 Quail Ridge Drive Acton, MA 01720 Constituent

MGB Public Comment- Westborough batch 12

Susie <susie.johnson70@gmail.com>

Wed 6/2/2021 4:17 PM

To:

DPH-DL - DoN Program;

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.

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.

Susie  
susie.johnson70@gmail.com  
Hopkinton



June 2, 2021

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

Dear Ms. Szent-Gyorgyi,

In our prior written and verbal public comments regarding the expansion of Mass General Brigham, we outlined the devastating consequences this expansion would have on UMass Memorial Health - Marlborough Hospital as well as the vulnerable populations in the region we serve. We understand you have re-opened the public comment period and we want to take this opportunity to briefly supplement our earlier submissions. In the short time since our prior public comment letters, much has happened in the hospital and health care world that further underscore the serious harm that will result if the MGB expansion is allowed to proceed. The growing gap between safety net providers like Marlborough Hospital and large, well-funded systems like MGB is becoming a crisis in health care. We especially commend for your consideration the thoroughly researched documentary on this point aired by PBS on May 18, 2021 entitled: "**Why Safety Net Hospitals Serving Low Income People May Be on the Brink of a Precipice.**" (<https://www.pbs.org/wgbh/frontline/article/safety-nethospitals-struggle-endangers-care-for-low-income-patients/>). This documentary makes the sobering point that we are at a true tipping point in this country between the "haves" and "have nots" in the hospital community. The result is that, as safety net providers become even more economically challenged (50% of safety net providers in the country last year had a negative operating margin), care for vulnerable populations, including communities of color, suffer greatly. Nothing could be more relevant to your review, as the MGB expansion puts these very issues into stark relief.

Additionally, on May 4, 2021, the Lown Institute, a nonpartisan think tank, released its first ever evaluation of hospital patient outcomes as well as their civic leadership and avoidance of overuse of low value procedures – a measure that also is tracked by the Health Policy Commission due to its cost implications. (<https://lowninstitute.org/projects/lown-institute-hospitals-index/>) The Lown Institute results (recently covered in *The Boston Globe*) highlight that UMass Memorial Health (UMMH) and other local competition in Central MA outperformed MGB facilities such as Mass General, Brigham and Women's, and Newton Wellesley with overall scores of A+. UMass Memorial Medical Center – University Campus also ranked nationally #12 on "avoiding test or procedures that offer little to no clinical benefit to patients" while MGB Academic Medical Center facilities were outside the top 100. Lastly, out of 55 hospitals evaluated in Massachusetts for inclusivity, MGB's Mass General, Brigham and Women's, and Newton-Wellesley facilities ranked low at 30, 36, and 52 respectively. UMass Memorial Medical Center and Marlborough Hospital ranked higher at 10 and 12 respectively for inclusivity within MA. Given that safety net providers in the region already outperform MGB on a key factor of cost (i.e., duplication of tests), this is yet another demonstration of how MGB's expansion will not result in the costs savings they claim. Consideration of such cost generating factors should be included within the scope of the Independent Cost Analysis of the proposed project. Closer to home, Professor Paul A.

Hattis, a highly respected professor and public health researcher in the Commonwealth for decades, and former member of the Health Policy Commission, recently published two pieces on the implications for the MGB merger and the issues DPH needs to address in its review. “What we need to know about Mass General Brigham expansion. The big question is whether it will add public health value, or not” and “Can Mass General Brigham integrate? Pressure is on to find operational savings.”

(Information found at <https://commonwealthmagazine.org/opinion/what-we-need-to-know-about-mass-general-brigham-expansion/> and <https://commonwealthmagazine.org/opinion/can-mass-general-brigham-integrate/>).

Professor Hattis first and foremost stresses the importance of having a detailed and accurate scope and data measures for the Independent Cost Analysis which will help guide the decisionmakers. In particular, he highlights as key, the need to measure the price difference between the ambulatory care provided by existing local providers versus the prices for services that would be delivered at the proposed MGB sites. Notably, Professor Hattis specifically rebuffs the myth being perpetrated by MGB that the expansion in Westborough is all about lowering the cost of care for its existing patients: “The reality is that Mass General Brigham is not spending almost \$250 million to make it more convenient for their current patients or to obtain that care at a lower price; it is to expand the total number of patients and generate new business.” He described the reality best in the April 15, 2021 article: “Think of Mass General and Brigham and Women’s as hungry lions that constantly need to feed.”

Furthermore, Professor Hattis calls for an assessment of the negative impacts on existing local providers who rely on commercial insurance to offset losses from their disproportionately large government pay population, specifically calling out UMass Memorial Health. Other health priorities of the DPH are also on his list, including negative impacts of the proposed project on employment and equity.

All of the above is highly relevant to what is going on in Massachusetts and the review you are pursuing. The stakes could not be higher for DPH and for all those who care about the future of health care in the Commonwealth for vulnerable populations. We hope you carefully consider this new information, the analyses that are most particularly needed, and the serious implications that will result if MGB’s brazen and massive expansion plans are allowed to proceed.

Thank you for your attention to this matter and for the anticipated rigor you will bring to your review.

Respectfully,

Steven Roach

<signature on file>

President

UMass Memorial Health – Marlborough Hospital

Michael D. Murphy

<signature on file>

President Chair

Board of Trustees

UMass Memorial Health – Marlborough Hospital



MGB Public Comment- Westborough batch 12

holly petterson <myvoice@oneclickpolitics.com>

Wed 6/2/2021 12:36 PM

To:

DPH-DL - DoN Program;

Re: Please Support Mass General Brigham!

Dear Department of Health,

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.

Sincerely,

holly petterson

pettersonholly@yahoo.com

75 neil street MARLBOROUGH, MA 01752 Constituent

HohlerE <Elizabeth.Hohler@umassmemorial.org>

Wed 6/2/2021 11:42 AM

To:

DPH-DL - DoN Program;

**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.

To Whom it may concern,

As a health care professional for over 30 years, I'd like to share my concerns for this proposed expansion by Mass General Brigham (MGB).

This would be a great detriment to our community and county here in Mass. This expansion would endanger our current safety net care, health equity, there is no need for these services in the Westborough area, higher costs for medical care, and reduced economic growth in our region.

First of all, all hospitals are substantially underpaid by MassHealth (60-65 cents on the dollar of cost) and other safety payors. In order for UMass to make up for any deficit they must counterbalance with other revenue- commercial insurance. Since UMass is the primary safety net provider in the region, it would dangerously impede our fiscal viability. This would force our health system to either increase rates, reduce services or some combination of the two, which puts UMass's safety net mission at a significant risk.

Next, with the nation focused on racial/ethnic disparities and social injustice, there is great concern with the health disparities impact of the MGB site in our region. These disparities would be effected in two ways:

- the MGB site is easily accessible for higher income predominantly white and commercially insured populations already served by existing providers. However, the location is not easily accessible to low-income residents and creates barriers to health care.
- Marlborough Hospital is classified as a High Public Payor Community since over 60% of the patients are insured by public programs like Medicare or Medicaid or are uninsured. It will continue to serve this population despite if its commercial volume is negatively impacted by MGB -yet fiscal viability will be compromised by its decreased ability to counterbalance financial losses from safety net care with commercial revenue. UMMMC would suffer similar ramifications as more commercial patients are referred to MGB's Boston hospitals for specialized care. All of this will force UMMHC to make drastic decisions (reduction in services) – and the impact therein would be felt by the most vulnerable patients that we serve and protect in our region.

MGB Public Comment- Westborough batch 12

Next, we do not feel there is a need for additional health care in the Westborough area. The proposed MGB facility is centered among towns where the median incomes are in the top 20% statewide, and most are commercially insured and are already amply served by multiple providers. There are 47 health care provider locations (to include hospitals, clinics, and outpatient practices) within 20 minutes of the Westborough site and 13 within 10 minutes.

Additionally, it would result in higher health care costs for the patients that we serve. MGB hospital pricing is 20% higher than the UMMHC system and with physician pricing that is 19% higher. An MGB expansion would drive up insurance cost for local employers and employees in two ways:


- First, MGB clinic's cost of care would likely be higher (increase cost) than nearby providers which would result increase cost of care as patients migrate from existing local providers.
- Second, when outpatient clinic patients are referred for specialized inpatient care, it will be to MGB hospitals in Boston that are significantly higher cost than any hospital in the state.


Lastly, this would reduce economic growth in our region. While the MGB proposal would offer 220 more jobs in the area, Westborough is not a medically underserved area. Since there is a finite need for health care in the immediate area, this clinic's size and number of caregivers are likely to result in loss of volume – and therefore loss of job—for other local community provides. But the negative impact does not stop there. By reducing the volume of referrals to UMMHC and sending them instead to other MFB hospitals in Boston, it will grow business in Boston while reducing business in Worcester. Over time, this could negatively impact prospects for economic development and job growth for our region.

In conclusion, thank you for granting UMMHC's request and to hold public hearings to raise our concerns (and other Worcester Businesses impacted) and for MGB to undergo an independent cost analysis to determine if in fact the proposed project would be consistent with the Commonwealth's efforts to meet the health care cost-containment goals established by the state's Health Policy Commission.

Thank you for your consideration in this matter and for protecting residents of this region -especially the most vulnerable patients in this area by allowing them continued access to high-quality cost-effective care.

Respectfully Submitted,

Bethann   
Elizabeth Hohler, RN-BSN  
Denial Management Team  
306 Belmont St, Suite 120  
Worcester, MA 01604

  
F-508-334-6094

[Elizabeth.Hohler@umassmemorial.org](mailto:Elizabeth.Hohler@umassmemorial.org)

MGB Public Comment- Westborough batch 12

tormemne whwiwnzb <myvoice@oneclickpolitics.com>

Wed 6/2/2021 1:11 PM

To:

DPH-DL - DoN Program;

Re: Please Support Mass General Brigham!

Dear Department of Health,

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.

Sincerely,

tormemne whwiwnzb

sebbypays2005@gmail.com

16 fountain street MILFORD, MA 01757 Constituent

MGB Public Comment- Westborough batch 12

Sharon <sharbrac@aol.con>

Wed 6/2/2021 11:06 AM

To:

**DPH-DL - DoN Program;**

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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.

Sharon  
sharbrac@aol.con  
Boylston

MGB Public Comment- Westborough batch 12

Michelle <mfz@zeamer.net>

Wed 6/2/2021 11:04 AM

To:

**DPH-DL - DoN Program;**

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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. My PCP is part of Charles River which is affiliated with MGB. While my PCP is right down the street from my my specialist are not. I have driving anxiety and a visit to a specialist means that my husband has to take time off of work to drive me. This inconvenience means that I put off care. Having MGB facilities located closer would be greatly appreciated.

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

Michelle  
mfz@zeamer.net  
Holliston

MGB Public Comment- Westborough batch 12

emily <readerolson@gmail.com>

Wed 6/2/2021 10:57 AM

To:

**DPH-DL - DoN Program;**

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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.

The organizations fighting this are not of the quality of MGh and don't plan to improve. For profit junk facilities like tenet or steward are afraid people will abandon them for a well run well staffed place like MGH so yes let them build here!

emily  
readerolson@gmail.com  
Framingham

MGB Public Comment- Westborough batch 12

Sandra <sreams37@gmail.com>

Wed 6/2/2021 10:56 AM

To:

**DPH-DL - DoN Program;**

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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.

While I live on Cape Cod my family is in Central MA and I would chose to travel to Westborough.,I also have family in the area that I would like to have a choice in care from the monopoly of UMass Memorial. UMass has said that MGB is a monopoly bthey are just trying to take away the choice and keep patients.

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.

Sandra  
sreams37@gmail.com  
East Falmouth



MGB Public Comment- Westborough batch 12

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

Received June 8, 2021

Postmarked April 15, 2021

Massachusetts Department of Public Health  
67 Forest Street  
Marlborough, MA 01752

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 James Hansel and I am a Nurse Practitioner at Marlborough Hospital Emergency Department. I have been proud to care for residents of Westborough, Marlborough and Central Massachusetts for the last year. 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.

MGB Public Comment- Westborough batch 12

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,

<signature on file>

James Hansel CNP

## MGB Public Comment- Westborough batch 12

United Way of Central Massachusetts  
484 Main Street, Suite 300  
Worcester, MA 01608-1880

[REDACTED]  
Fax: 508-757-2712

United Way of Central Massachusetts website

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

Received June 8, 2021

### Postmarked April 6, 2021

Massachusetts Department of Public Health  
67 Forest Street  
Marlborough, MA 01752

Dear Ms. Szent-Gyorgyi:

Thank you for the opportunity to express our significant concerns about Mass General Brigham's plan 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,

<signature on file>

Tim Garvin

President and CEO

United Way of Central Massachusetts