



**Department of Medicine  
Division of Hematology/Oncology**  
*University Campus  
55 Lake Avenue, North  
Worcester, MA 01655-0001*  
[Redacted] *Fax: 774-442-6715*

April 14, 2021

**Shyam A. Patel, MD, PhD**  
*Assistant Professor  
University of Massachusetts Medical School  
UMass Memorial Health Care*

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 giving Central Massachusetts community members the opportunity to express our concerns regarding Mass General Brigham's proposal to establish an outpatient center in Westborough.

My name is Dr. Shyam A. Patel. I am an assistant professor of Hematology/Oncology at the University of Massachusetts Medical School, and a practicing physician in affiliation with UMass Memorial Medical Center.

I am writing to stress the negative impact on health care disparities that would occur if MGB were to have a location in Westborough. MGB's proposed site would be in a high-income region, targeting predominantly white, mobile, and commercially insured patients who are already served by local providers. It would not be easily accessible to residents of low-income communities with barriers to health care, leaving access and the needs of many people behind.

Furthermore, this expansion is likely to take commercial patients away from lower-cost, High Public Payer community hospitals and health systems which rely on that care to maintain operations and counterbalance lower reimbursements from government programs. I am proud to work for an organization that delivers excellent care to many patients with a wide variety of insurance plans. I fear that MGB's presence in Westborough would disrupt the ability of our essential community health systems to deliver quality care to the people of our state, including MassHealth patients, people living in poverty, and people affected by health inequities.

To best understand this proposal's impact on health disparities in our state, I respectfully ask that the Department of Public Health require the Health Policy Commission to conduct an independent cost analysis. Once this is complete, I request that the DPH hold another public hearing on this application.

Thank you for your attention to this important matter.

Sincerely,

A handwritten signature in black ink that reads "Shyam Patel". The signature is written in a cursive style with a prominent initial 'S'.

Shyam A. Patel, MD, PhD

**From:** [Shweta](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS  
**Date:** Saturday, April 10, 2021 2:10:27 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. 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.

Shweta  
shweta.kapdoskar@gmail.com  
Westborough

**From:** [Sharon](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS  
**Date:** Saturday, April 03, 2021 11:21:53 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.

Sharon  
sagravell@yahoo.com  
Westborough

**From:** [Sergei](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS  
**Date:** Tuesday, April 13, 2021 9:46:47 PM

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As a local resident and Mass General Brigham employee, I believe our relationship with our patients is at the heart of the healthcare experience – for patients, their communities, care team members, and employees.

Understanding our patients' personal stories and building a lifelong relationship is crucial to making healthcare less complicated, less fragmented, and less costly.

Our response to COVID-19 is an example of how a coordinated approach can result in better access. I support this project, and I am looking forward to working with Westborough and the surrounding communities to ensure that Mass General Brigham that uses our people, research, and technology to meet the needs of our patients.

Sergei  
sroumiantsev@mgh.harvard.edu  
Southborough

## **TESTIMONY OF SEAN M. ROSE, PRESIDENT & CEO OF THRIVE SUPPORT & ADVOCACY**

**April 6, 2021**

**Massachusetts Department of Public Health Public Hearing**

My name is Sean Rose and I am the President & CEO of Thrive Support & Advocacy, a Marlborough-based nonprofit organization that serves people with intellectual and developmental disabilities across 47 communities in Eastern and Central Mass. I am also a Worcester City Councilor.

Thrive was founded over four decades ago in Marlborough by parents who wanted a better life for their children than what the state could offer through its institutions. Since that time, our agency has been woven into the fabric of this close-knit community. We often come to the aid of our neighbors when it is needed and, similarly, they often assist us when we need a hand. They also generously support our mission.

UMass Memorial Health's Marlborough Hospital has been an extraordinary partner to Thrive and the individuals it supports. In fact, it is hard to even contemplate how our organization would have made it through the COVID-19 pandemic without the assistance of Marlborough Hospital.

The hospital provided COVID-19 testing for employees and individuals which absolutely enabled us to stay ahead of the virus. Whatever we have needed over the last 13 months to protect the health of those we serve, the hospital has stepped up to provide it. They routinely check in with us to see what we need. Senior officials from the UMass Memorial system have been accessible and responsive, whether it is CEO Dr. Eric Dickson or Chief of Surgery Dr. Michael Hirsch.

Beyond the assistance that Marlborough Hospital has provided to Thrive, the UMass Memorial Health system has delivered outstanding care across Central Mass. since its founding decades ago. Its presence has ensured that Worcester residents have access to high quality specialty care, a level one trauma center, and an emergency department that treats 135,000 patients a year. Its affiliation with the nation's 10<sup>th</sup>-best medical school for primary care and a top 50 medical school overall – as well as having won a Nobel Prize for genomics – ensures a medical center steeped in the latest advances and newest medical techniques, all for the benefit of our region.

Put simply, as both a nonprofit CEO and city elected official, I see no need for an enormous, expensive new Mass General Brigham ambulatory center in Westborough. From the perspective of the region, its businesses, nonprofits and people, what problem does a new Mass General Brigham facility solve? How does it address current medical needs of this region that are unmet?

A costly new ambulatory center will add no value to the region. MGB's services are among the most costly in the Commonwealth; UMass Memorial's are among the least.

Moreover, as CEO, I am responsible for ensuring that our agency can meet the needs of those it serves within the budget afforded by state reimbursements for the services we provide and the donations made by generous local residents. Funding the annual increases in our health care premium expense is a perennial problem. The increase in the cost of health care has been a major challenge for our agency, as well as for our dedicated employees who do work they are passionate about for relatively low pay, and who must cover their share of the premiums.

If the most profitable services that Marlborough Hospital provides are shelled by MGB-Westborough, and the hospital is left with the far less profitable services like the emergency department, we risk losing Marlborough Hospital altogether, and that is a price we simply cannot pay.

The COVID-19 pandemic has laid bare the inequities in our health care system. The MGB plan does not attempt to correct these inequities and, in fact, will worsen them. The high-margin medical services that it seeks to provide in Westborough will undermine local health institutions, particularly as patients who are seen there that need specialty care are sent to Mass General and Brigham & Women's, which will see new capacity as part of MGB's expansion plan.

Central Mass. does not need MGB's "help." We have a self-sufficient health care system that has looked out for the needs of our residents, including those with disabilities. Let's support the system that we have.

Thank you.



The Commonwealth of Massachusetts  
MASSACHUSETTS SENATE

SENATOR JAMES B. ELDRIDGE

*Middlesex and Worcester District*

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*Chair*

JOINT COMMITTEE ON THE JUDICIARY

*Vice Chair*

JOINT COMMITTEE ON ENVIRONMENT,  
NATURAL RESOURCES AND AGRICULTURE

DISTRICT OFFICE

225 MAIN STREET, ROOM 106  
MARLBOROUGH, MA 01752

April 6, 2021

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

**RE: My Serious Concerns about Proposal 21012113-AS; Mass General Brigham Construction and Development of Three Ambulatory Care Centers – Westborough, Woburn & Westwood**

Dear Director Szent-Gyorgyi,

As the State Senator for the Middlesex and Worcester District, including Westborough, Northborough, Southborough and Marlborough, and 10 other communities in the MetroWest region, I am writing to express my serious concerns about the proposal by Mass General Brigham (MGB) to build ambulatory centers in Westborough, Woburn and Westwood. As the State Senator representing the town of Westborough, I am particularly focused on this ambulatory center and its potential negative healthcare costs, job loss, and widening inequality impacts and general detrimental effects on regional hospitals not only in my district, but throughout MetroWest and Central Massachusetts.

I recognize and completely understand that the town of Westborough is on record in support of this project. However, when it comes to healthcare, I think it is critical to look at this ambulatory care center proposal through the lens of the entire healthcare system, and therefore very different from almost every other industry or service.

I also want to acknowledge that our state's and our country's healthcare system is broken, with far too much focus on profit and competitive share between different healthcare networks, and an unequal patient compensation system for residents, often based on income and the kind of health insurance people have. To be frank, in our healthcare system, very few stakeholders' hands are clean. It is my opinion, however, from a big picture point of view, that the approval of these proposed ambulatory centers will only exacerbate healthcare inequities that have been laid bare by the COVID pandemic.

In conversations with my constituents, first and foremost I hear that it is extremely important that a community hospital is close to them. While there is no doubt that an ambulatory center could provide some of the healthcare needs of area residents, an ambulatory center has a different mission from a hospital, especially community hospitals.

For the Senate district that I represent, this includes Marlborough Hospital, Emerson Hospital, and Nashoba Valley Medical Center. If any of these hospitals were to close, it would be absolutely devastating. Given the proximity of MGB's proposed ambulatory center in Westborough to Marlborough Hospital, and its affiliation with UMass Memorial Hospital in Worcester, my comments here are focused on Marlborough Hospital.

Marlborough Hospital and UMass Memorial are safety net hospitals. Marlborough Hospital is a safety net hospital with some 65 percent of its patients covered by public payor plans (MassHealth or Medicare) or uninsured. And UMass Memorial is a safety net system which serves the majority of MassHealth patients in Central Massachusetts and more than any other health system in the region. Because MassHealth pays significantly below the actual cost of care (typically about 60 to 65 cents on the dollar of cost), safety net hospitals remain financially solvent (and therefore open) by depending on revenue from patients who have commercial health insurance plans. More often than not, such patients, and residents live in communities like Westborough, Southborough, and Northborough. I am very concerned that MGB's proposed Westborough ambulatory center is precisely located where it is easily accessible to the region's wealthier towns, but is not nearby nor easily accessible to most low income patients. Therefore, MGB could cherry-pick commercial patients from local healthcare providers such as Marlborough Hospital, and disrupt the ability of safety net providers to remain fiscally viable.

I am also very concerned about the potential for job loss at the Marlborough Hospital and UMass Memorial Hospital if MGB's proposed ambulatory center is approved. Over the past month, I met with nurses and administration officials at the Marlborough Hospital, many of whom have worked at the hospital for decades, who are deeply dedicated to providing healthcare for residents throughout the Metrowest and Central Mass region, including many of my constituents. They are very concerned about the potential job loss at these hospitals, whether due to fewer patients going for care, or even the possibility that particular healthcare units, or an entire hospital could close. While I recognize that MGB's proposed ambulatory care center would create some jobs, it's critical to realize that an ambulatory care center is very different from a hospital. I take very seriously any government policy, federal or state investment, or private corporation that takes an action that could lead to the current hospitals serving my district to no longer exist.

Finally, from an equity lense, I think it is important to emphasize that an ambulatory center generally serves a very different population compared to safety net hospitals, including Marlborough Hospital and UMass Memorial Hospital, around race and ethnicity, and income. As more and more state laws, agencies, and programs are reviewing policies, investments, and decisions through an equity lense, I most certainly hope that all Department of Public Health offices, including the Determination of Need Program reviews all proposals with a focus on how BIPOC communities and low-income residents could have more or less access to what I consider a human right, healthcare, if such a proposal becomes a reality. While again I am mostly focused on these impacts on constituents in the Senate district that I represent, I want to emphasize that since MGB's full proposal is for three ambulatory centers in three regions of Massachusetts, the Department of Public

Health, and the Baker-Polito administration's decision on this proposal has massive consequences from that equity lense for the entire Commonwealth.

In conclusion, I do want to reiterate my serious concerns around DPH approving this proposal from Mass General Brigham. I know that in reviewing all proposals, DPH automatically solicits an independent cost analysis to better understand the complex and multifaceted potential impacts on healthcare access across the region. I urge DPH to ask for an analysis that includes impacts on BIPOC and low-income communities, the potential financial impacts on safety net hospitals, and through standard or urgent need for additional healthcare facilities in the region, versus convenience. Finally, I urge DPH to maintain robust public outreach and stakeholder engagement at every point in the Determination of Need process, including to BIPOC, low-income, and working class communities, and healthcare workers.

Thank you for your ongoing work to facilitate this process and please do not hesitate to contact me with any questions.

Sincerely,

A handwritten signature in blue ink that reads "James B. Eldridge". The signature is fluid and cursive, with a long horizontal stroke at the end.

James B. Eldridge  
**State Senator**  
*Middlesex & Worcester District*

**From:** [Scott Gardner](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** Support for MGB Westborough  
**Date:** Monday, April 12, 2021 7:37:58 AM

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ToL Department of Health, Determination of Need Committee  
RE: MGB Westborough

This email is to support the approval of the MGB Westborough facility. This facility would help the serve the Central MA community that currently travels to Boston for services. Limiting travel for this underserved area ( limited medical facilities, no COVID vaccination sites, limited availability to quality health care) would enhance the footprint of MGB's health initiative, something lacking in Central Massachusetts. Limiting travel would also improve the carbon footprint for this area.

Currently the Central MA area drives to Boston or Foxboro to take advantage of MGB services - comprehensive all - in - one timely services that are not possible in Central MA. Multiple appointments are required with significant delays to obtain diagnostic testing and appointments for well health book more than one year in advance. Copays are required as well as facility charges for all of the visits for the same issue. Primary care physicians are scarce and coordination of care is managed by the payment. And all of this at the premium cost of health care, which many families work to support.

Advantages to MGB Westboro:

- \*Servicing community already win need of services and traveling significant distances for these serves
- \*Providing equal access to services, something not available to residents of these communities. ( MA Vax sites, disadvantaged access, etc.)
- \*Access to primary care physicians and diagnostics services for comprehensive, affordable health care

- \*Well health visits within reach
- \* Less travel
- \*Access to a network coordinated by primary care physician
- \*Ability to participate in medical trial as availability within reasonable distance for the fragile/ critically ill
- \*Coordination of care and services
- \*Filling void in Central MA
- \*Easy travel access - Rtes 495, 290, I-90
- \*Community access to facilities: restaurants, hotels, etc.
- \*Community support and staffing for required town services ( police, fire, etc.)
- \*Community access to hazardous waste disposal

Thanks for the opportunity to voice my support for this MGB site.

Scott Gardner

10 Broushane Circle  
Shrewsbury, MA. 01545  
April 10, 2021

**From:** [Satish](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS  
**Date:** Friday, April 16, 2021 4:59:55 PM

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Dear Madam/Sir:

I am a Westborough resident and a proud patient of Mass General Brigham. 15 years ago, my wife and I were trying to conceive, and were given up on by all the local hospitals until we found Brigham and Women's in Boston. They not only gave us hope, but helped give us two boys, and for that we will never be able to thank them enough. Years later, my mother-in-law began fainting and we immediately took her to all the area hospitals hoping for a quick diagnosis. Each one of them sent us back home, telling us that she had no issues. Again, we finally went to Brigham and Women's and again, they fully listened to our concerns and successfully diagnosed her issue.

The main reason that my family didn't try Brigham and Women's earlier was the distance from our home. An MGB center in Westborough would provide the best possible healthcare, close to home, for us and their 42,000 existing patients in the area.

The low quality of healthcare in Central MA is a problem, and MGB's expansion will drastically improve the situation. Many people are concerned that the competition from their new facility will harm UMass Memorial and other local hospitals – as a consultant, I have to compete for my job every day. Competition is healthy. It drives me to improve the services I provide to my clients, and it should do the same for the healthcare providers who failed me in the past. I fully support this project and ask for its approval.

Sincerely,

Satish Hiranandani

Westborough, MA

Satish  
s\_hiranandani@hotmail.com  
Westborough

**From:** [Sandra](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS  
**Date:** Friday, April 16, 2021 4:43:51 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. We need more access to care in our community. As a long time patient of MGH physicians and long time resident of Metro West, it would be most beneficial for me to be able to access my quality health care nearby. Time spent driving and adjusting for traffic add to the stress of a medical appointment. Having that care nearby would be a wonderful solution.

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

Sandra  
snekberg@yahoo.com  
Southborough

**From:** [RoseMary Morrissey](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** Determination of Need Program MGB Westwood  
**Date:** Monday, April 12, 2021 6:30:43 PM

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I am a resident of Westborough and I and members of my family have been patients at MGB in Boston. I believe that MGB offers a very high quality of health care, especially in critical situations. I believe that this level of care should be available to everyone who needs it, regardless of the type of health insurance they have, or if they do not have health insurance. I am interested in MGB's proposed expansion into Westborough. I listened to last week's telephone discussion of this proposed expansion. Representatives from UMass and Marlboro's hospitals stated that they were 'safety net' hospitals and MGB's expansion would have a negative effect on their ability to serve low income patients. This concerns me. I feel that local hospitals and MGB each have a role in serving the health needs of the community. I am also concerned that if MGB monopolizes health care in this area it could increase health care costs way beyond their current levels. I would like to see further discussion of these issues and some assurances that these concerns will be addressed. I would like to see MGB open a facility in Westborough but feel the need for more information.

Thank you for considering my concerns.

Rose Mary Morrissey

**From:** [Ronald](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS  
**Date:** Monday, April 12, 2021 4:03:54 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. We need more access to good medical care in our community.

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.

Ronald  
ronaldng.adc@gmail.com  
Hopkinton

**From:** [Rogelio](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS  
**Date:** Wednesday, April 14, 2021 9:55:34 AM

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As a local resident and Mass General Brigham employee, I believe our relationship with our patients is at the heart of the healthcare experience – for patients, their communities, care team members, and employees.

Understanding our patients' personal stories and building a lifelong relationship is crucial to making healthcare less complicated, less fragmented, and less costly.

Our response to COVID-19 is an example of how a coordinated approach can result in better access. I support this project, and I am looking forward to working with Westborough and the surrounding communities to ensure that Mass General Brigham that uses our people, research, and technology to meet the needs of our patients.

Rogelio  
rguzman5253@gmail.com  
Bolton

**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 9:10:40 PM

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**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.**

Hi. My name is Rita Caputo. I work at UMass Memorial in the Primary Care Clinic, where I handle prescriptions. I'm co-President of the SHARE Union, and we represent 2900 employees at UMass Memorial Medical Center.

I've been on the union side of contract negotiations many times over the last 20 years. The cost of benefits is always a big issue. We've negotiated with UMass Memorial and agreed to a good benefits package. It makes a huge difference to our members – they always rank holding onto benefits as the top priority for contract negotiations.

The last thing we need is the cost of health insurance to go up in Central Massachusetts.

I'm really worried that if MGB moves west, the cost of care will go up for everyone. Not for nothing but the Health Policy Commission says that when procedures move to outpatient Mass General Brigham facilities, costs go up overall. MGB charges 20% more than UMass Memorial. How is that fair?

If MGB drives up the costs of health care, it's going to hurt everyone except MGB. At least we have a union to try to figure out what to do about it with our hospital, on behalf of our members. I feel bad for all the non-union workers out there, and the small businesses trying to provide health insurance for their employees.

I think DPH really needs to do their homework on this one. Would these new MGB facilities drive up the cost of care in MetroWest and Central Mass? The Independent Cost Analysis needs to be truly independent. The Health Policy Commission are the right people to do this job. And they need to look at the effect on our safety net hospitals and our patients

I really don't think we need MGB to get bigger and come into our neighborhood. I think DPH should say No.

Thank you.

Rita Caputo  
12 Travis Street  
Worcester, MA 01604

**From:** [Ellison, Richard](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** Massachusetts General Brigham proposed Westborough Facility  
**Date:** Wednesday, April 14, 2021 10:14:58 PM

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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:

I have been both a Shrewsbury resident and member of the medical staff at UMass Memorial Medical Center for 29 years, and I am writing to oppose Massachusetts General Brigham's (MGB) Determination of Need application to open an outpatient facility in Westborough.

I am an infectious disease specialist and since 1991 have provided care to HIV positive individuals, patients with tuberculosis, those with infectious complications from opiate abuse, and those infected with COVID-19. I am greatly concerned that the proposed MGB facility will adversely impact the overall provision of healthcare to central Massachusetts. MGB will cherry pick the region's commercially insured patient population and deprive central Massachusetts "safety net" medical facilities of resources that could be used both to provide excellent care to the Westborough patient population and concurrently support services for the underinsured, vulnerable patients to which I have provided care for more than 29 years.

While a select portion of patients living with HIV, tuberculosis, opiate abuse, and COVID-19 do have medical insurance, a far larger percentage have limited or no medical insurance. In addition, many of these individuals have limited means of transportation and would not be readily able to travel to the proposed MGB facility to receive outpatient care. They would further be highly reluctant to travel from central Massachusetts to Boston to receive specialty care from the MGB providers affiliated with the proposed Westborough facility.

The financial health of existing non-profit and for-profit healthcare facilities is of great importance to the health and well-being of both the central Massachusetts patient population, and to that of the Commonwealth as a whole. Over the last year, UMass Memorial Medical Center has committed significant resources to setting up and operating the DCU COVID-19 field hospital that has been not only the largest field hospital in the state, but one of the largest in the country, and has provided care to patients referred from across the state.

This operation was only able to be undertaken so quickly and professionally due to the fiscal health of the UMass Memorial Healthcare network. I have great concerns that the MGB Westborough facility could adversely impact that financial stability that continues to enable the delivery of quality care for *all* community members.

As part of the review process for MGB's Determination of Need application, I would like to request that a cost analysis be undertaken by the Health Policy Commission to critically assess all of the financial implications of having this new facility open.

Sincerely,

Dick Ellison

---

Richard T. Ellison III, MD  
Hospital Epidemiologist  
UMass Memorial Medical Center

Professor of Medicine, Microbiology and Physiological Systems  
Division of Infectious Diseases  
University of Massachusetts Medical School  
55 Lake Avenue North  
Worcester, MA 01655

  
Fax – 508-334-2218

Email: [Richard.ellison@umassmemorial.org](mailto:Richard.ellison@umassmemorial.org)

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**From:** [Amy Killingsworth](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** Letter  
**Date:** Wednesday, April 14, 2021 8:32:47 AM  
**Attachments:** [image001.png](#)  
**Importance:** High

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Please see below on behalf of Pondville Medical Associates

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.

Pondville Medical Associates is proud to serve patients from Westwood and surrounding communities for over 20 years.

Our local health systems are critical to providing our residents with high-quality, affordable care. I believe that MGB's expansion into Westwood 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 Westwood, 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 Westwood area and thank you for your time on this matter.

Sincerely,

**Riad Mortada, MD**

Amy Killingsworth  
Practice Administrator  
Pondville Medical Associates, LLC  
31 Pine Street, Suite 300  
Norfolk, MA 02056

[REDACTED]  
Fax: 508-623-3701



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*The Commonwealth of Massachusetts*

HOUSE OF REPRESENTATIVES  
STATE HOUSE, BOSTON, MA 02133-1054

**CAROLYN C. DYKEMA**  
STATE REPRESENTATIVE  
8<sup>TH</sup> MIDDLESEX DISTRICT  
STATE HOUSE, ROOM 127

████████████████████  
Carolyn.Dykema@MAhouse.gov

COMMITTEES

CHAIR  
Environment, Natural Resources,  
and Agriculture

COVID-19 and Emergency Preparedness  
and Management

Treasurer, Caucus of Women Legislators

April 5, 2021

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

**RE: Proposal 21012113-AS; Mass General Brigham Construction and Development of Three Ambulatory Care Centers – Westborough, Woburn & Westwood**

Dear Ms. Szent-Gyorgyi:

Thank you for your consideration of stakeholder and public input on the Determination of Need application submitted by Mass General Brigham for ambulatory surgery facilities in the Town of Westborough and two other sites in eastern Massachusetts. I offer comment as a legislator representing part of Westborough and three other communities in the MetroWest region and to support a full assessment of the potential impacts of this proposal on access to care over both the short- and long-term, before issuing a determination.

Ensuring access to high-quality, affordable health care is essential to residents of Westborough and all communities in the MetroWest and Central Massachusetts region, especially those hardest hit by COVID-19. Now more than ever, health equity and access is at the forefront of the public consciousness and our planning must carefully consider the direct and indirect impacts, particularly on vulnerable communities, of any proposal that has the potential to significantly impact health care delivery.

The solicitation of an independent cost analysis of this proposal is justified given what I understand to be complex and multifaceted potential impacts on health care access across the region. I also encourage the Department to continue to maintain robust public outreach and stakeholder engagement at every point in the Determination of Need process.

Thank you for your ongoing work to facilitate this process and please do not hesitate to contact my office with any questions.

Sincerely,

  
Carolyn Dykema

**From:** [Rebecca](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS  
**Date:** Monday, April 05, 2021 8:06:19 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. 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.

As a BWH/DFCI patient I completely support you opening a facility in Westborough, with your top notch doctors and Harvard med students!

Rebecca  
beckyar@aol.com  
Westborough

**From:** [Ravindran, Karthik](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** Westborough DON  
**Date:** Thursday, April 15, 2021 8:30:06 PM  
**Attachments:** [pastedImagebase640.png](#)  
[pastedImagebase641.png](#)  
[pastedImagebase642.png](#)

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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 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. Karthik Ravindran, and I am a primary care doctor with the Tufts Medical Center, Framingham practice. I am proud to serve patients from Westborough and surrounding communities for 8 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,

**Karthik Ravindran, MD**  
Treasurer, MetroWest Healthcare Alliance  
67 Union St, Ste 113, Natick, MA 01760



[REDACTED] | Fax : 508-650-7478  
[www.mwhealthcarealliance.com](http://www.mwhealthcarealliance.com)

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Assistant Professor, Tufts University School of Medicine  
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**From:** [Randy Pellish](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** Enormous Negative Impact of MassGeneral Brigham Expansions in Westborough and Woburn  
**Date:** Wednesday, April 14, 2021 3:08:48 PM

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Dear Madams and Sirs:

I am writing as a Massachusetts resident, residing in the town of Westborough, and as a physician employed at the Lahey Hospital and Medical Center, to voice my **strong opposition against** the Mass General Brigham outpatient centers proposed for Woburn, MA and for Westborough, MA for several reasons:

- These outpatient centers will increase healthcare costs in the Commonwealth as Mass General Brigham has much higher reimbursements than other health care systems, even when care is provided in the community.
- Given the availability of primary care physicians, specialty care physicians, ambulatory surgery, CT scans, MRIs, and other community hospital services currently available in the Woburn and Westborough area, these proposed outpatient centers include duplicative services and present an **unnecessary threat to the local physician practices and community hospitals**, including Winchester Hospital and Melrose-Wakefield Healthcare. In the case of the Westborough expansion, the threat is enormous to the medical centers in Worcester (UMassMemorial Medical Center and Worcester Medical Center/St. Vincent's Hospital) and will negatively impact these major medical systems that are working extremely hard to care for patients in central Massachusetts.
- These proposed outpatient centers will endanger private medical practices, where primary care physicians and specialists are offering exceptional care at lower costs. Local physicians include some of the highest reputation physicians in the region, providing high quality care at a much lower cost, as compared to Mass General Brigham providers.

- Approval of these proposed outpatient centers will threaten the ability of existing high value providers (high quality and low cost) to continue to serve the residents of Woburn and Westborough, and their surrounding communities.

Please **STOP** these projects to prevent escalation of healthcare costs and to maintain high value care for the patients and employers of the region.

The additional care MassGeneral Brigham purports to provide in these areas is unnecessary and will be **severely detrimental to the Commonwealth** and the ability for healthcare systems to thrive in a very difficult healthcare market.

Sincerely,

Randall Pellish, MD

32 Blake Street

Westborough, MA

Staff Gastroenterologist and Director, Inflammatory Bowel Disease Center

Lahey Hospital and Medical Center, Burlington, MA

**From:** [Ramanathan, Muthalagu](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** "Testimony - Mass General Brigham Incorporated – Multisite - 21012113-AS"  
**Date:** Thursday, April 01, 2021 5:44:57 PM

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Dear Sir/Madam,

My name is Muthalagu Ramanathan. I appreciate the opportunity to share my concerns with the Department of Public Health about MGB's community expansion plans and intent to establish an outpatient center in Westborough

I currently serve as a hematology malignancy and stem cell transplant physician at UMASS university campus and have been working there for more than 11 years. Being affiliated with a safety net healthcare provider, I have serious concerns about how MGB's proposed expansion will impact health equity and negatively impact safety net care providers such as UMASS

- I believe that the Mass General Brigham's (MGB) expansion into Westborough will threaten essential local jobs and the financial viability of critical community care institutions.
- The introduction of MGB's ambulatory services is targeted to high-income communities with a disproportionate share of commercially insured patients.
- By targeting commercially insured patients, MGB intends to siphon these patients away from lower-cost, High Public Payer hospitals and health systems.
- All hospitals are substantially underpaid by MassHealth and other safety net payors, and often only receive 60 to 65 cents on the dollar of cost.
- To remain fiscally afloat, safety net systems like UMASS Health Care must counterbalance these losses with other revenue, including payments from commercial insurance.
- If our community providers lose a substantial number of commercial patients to MGB, it will seriously impede their fiscal viability by disrupting the balanced payer mix that enables them to maintain operations and deliver quality care to MassHealth patients, people living in poverty and patients affected by health inequities. This could force community providers to reduce services or raise commercial insurance rates, or do some combination of the two.
- 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.
- MGB hires from within for positions at ambulatory facilities regardless of where the sites are located, leading to no net increase of jobs for the community. Local jobs lost as a result of MGB's expansion will therefore likely remain lost.

- Westborough is not a medically underserved community.
- There are 13 health facilities within a 10-minute drive of the proposed site that provide the same services as those proposed for MGB's ambulatory care facility. Just 20 minutes from the Westborough site, there are 47 health provider locations.
- DPH is still developing guidelines for how to define proximate development by defining primary service area. Approving a project that raises such issues before these guidelines are finalized and enacted through a standard public comment process would set a dangerous precedent that threatens the future of community hospitals.
- **Local care is important and quality care is local!**

Additionally, I respectfully request that the Department of Public Health require the applicant to hold another public hearing on this application. The time of day which this hearing is being conducted does not make it accessible for interested parties to share their concerns. In order to accurately understand the impact of this proposal, I suggest that the additional public hearing be scheduled for after the independent cost analysis has been conducted. Furthermore, in order for the cost analysis to be truly independent, I am asking the Department to require that the Health Policy Commission conduct the independent cost analysis.

*Muthalagu Ramanathan MD*

Associate Professor of Medicine

Co-Director of Blood and Bone Marrow Transplant Program

Director, Myeloma Program

Division of Hematology/Oncology

University of Massachusetts Medical School

UMass Memorial Cancer Center

55 Lake Avenue North

Worcester, MA 01655

Fax.: 774-443-7890

Email: [Muthalagu.ramanathan@umassmemorial.org](mailto:Muthalagu.ramanathan@umassmemorial.org)

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**From:** [Vuolo, Rachel \(Marlborough\)](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** Testimony - Mass General Brigham Incorporated – Multisite - 21012113-AS  
**Date:** Friday, April 16, 2021 12:49:07 PM

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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 Rachel Vuolo and I am a primary care physician practicing in Marlborough. I have been proud to care for residents of Westborough, Marlborough and Central Massachusetts for 11 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.

**Keeping Masshealth and other safety net providers and centers viable in Massachusetts needs to be a priority. As a Masshealth provider, I see every day how difficult it is to find appropriate services such as mental health and social services for my patients. If the scale tips further toward the privileged and affluent in MA, we are doing a great disservice to a huge portion of our patients and to the public health of Massachusetts. We desperately need more community health centers and well-funded free clinics not this type of service!**

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,

Rachel Vuolo, MD

Internal Medicine-Pediatrics

Marlborough Primary Care

640 Bolton Street

Marlborough, MA 01752

[REDACTED]

[REDACTED]

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**From:** [Priscilla](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS  
**Date:** Tuesday, April 13, 2021 5:25:17 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. 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.

Priscilla  
pab5963@verizon.net  
Northborough

**From:** [Paul](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS  
**Date:** Monday, April 05, 2021 8:11:18 PM

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As a local resident of Westborough, I support Mass General Brigham's project to provide the same healthcare I receive today in Boston closer to my home.

Through my efforts as a primary caregiver for a Dana-Farber Cancer Institute patient, I was able to experience and observe the outstanding care and support my female life partner received at the Brigham and Women's Hospital in Boston.

As a patient, I've used both the Brigham and Women's Hospital and Massachusetts General hospital for care and have had nothing but great experiences with both of these medical-service providers.

I'm totally in favor of having closer geographical access to at least some of the services provided by the Mass General Brigham.

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

Paul  
deals24book@verizon.net  
Westborough

**From:** [Patricia](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS  
**Date:** Monday, April 05, 2021 8:55:22 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.

Patricia  
myalexbuddy@gmail.com  
Northborough