From: <u>Kristin</u>

To: <u>DPH-DL - DoN Program</u>

Subject: DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS

Date: Friday, April 09, 2021 2:32:55 PM

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

Please consider urgent care offerings in Westborough!

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.

Kristin nichols_kristin@yahoo.com Hopkinton From: <u>Janet Wilder</u>

To: <u>DPH-DL - DoN Program</u>

Subject: Determination of Need ("DoN") Application Project #21012113-AS – Mass General Brigham -- Opposed

Date: Thursday, April 15, 2021 9:10:40 PM

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

Hello Everyone, my name is Kelly Fournier and I am a radiation therapist, working at UMass Memorial Cancer Center located at UMass Memorial Marlborough Hospital. I have been employed by UMass and a member of SHARE for over 17 years and I have treated all kinds of patients with cancer every day.

Thank you for the opportunity to voice my opinion.

I don't understand why the Westboro area needs more healthcare options, when there are already plenty. The opening of such a big place would take patients and business away resulting in job cuts at the surrounding hospitals. UMass Memorial is a safety net hospital. We treat everyone. When I administer radiation to someone with Cancer, whether it be breast, prostate, lung, brain or any other type of cancer, I see the patient as a whole person who is sick, who needs my expertise to get well and survive a life threatening illness. Each patient has a story, loved ones, and reasons to live.

A lot of our patients have MassHealth insurance. We welcome and treat everyone. They are just as sick and just as deserving of our care as anyone else, even though our hospitals get paid less for caring for them than for patients with private insurance.

I worry that a new MGB facility in Westborough would pull the private insurance patients away from UMass Memorial. We need those patients too. It makes up for the cost of caring for MassHealth patients. Our safety net hospitals will be in financial danger and may not survive. That could be a huge impact not only on our jobs, but also on our patients who need a safety net hospital like Umass Memorial. They need us to be here for them.

I'm not an expert on healthcare policy, but the only reason I see for MGB building these new projects is to increase their own economic growth.

Thank you for listening and considering my opinion on this new project.

Kelly Fournier 5 Arline Drive Rutland, MA 01543 From: Kristen

To: <u>DPH-DL - DoN Program</u>

Subject: DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS

Date: Monday, April 05, 2021 9:48:59 AM

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.

Kristen krisragosta@aol.com Upton From: Kristen

To: <u>DPH-DL - DoN Program</u>

Subject: DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS

Date: Friday, April 16, 2021 4:44:24 PM

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

As a local resident, I support Mass General Brigham's project to provide the same healthcare I receive today in Boston closer to my home. I plan to continue using neighboring health care centers such as UMass Memorial, for emergency and some specialist care as I do now. However, it would be great to have additional MGB physicians nearby, as most of my health care is done within that network.

Thank you!

Kristen kristen.macisaac.nugent@gmail.com Westborough From: Kor

To: <u>DPH-DL - DoN Program</u>

Subject: DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS

Date: Tuesday, April 06, 2021 8:37:18 AM

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.

Access to world class Mass General Brigham care in this area is long overdue. As a resident of the area, I am thrilled to know that care will be available in the Central MA area. My family currently has to travel as far as Newton/Jamaica Plain/Foxboro/Boston to access our providers which is 30-60 mins away. We frequently utilize urgent care facilities since it's more convenient, but of course, also leads to more fragmented care.

As a MGB employee, I think this area is desperate need of options for patients. Patients frequently call to request appointments and are upset to learn that the closest option to them is over 30 mins away. This poses a challenge for so many with transportation issues and financial barriers to receiving the care they need and desire. A presence in Westborough would afford these patients options that they don't currently have.

Thank you for considering this wonderful opportunity to support our community!

Kori kberardino@bwh.harvard.edu Marlborough Hi, my name is Kim Latrobe. I appreciate the opportunity to share my concerns. I am a Vascular Ultrasound technologist at Umass Memorial and I have worked there for 11 years.

I feel the building of this large outpatient facility by Mass General Brigham's in Westborough will just raise the cost of our healthcare, which in the long run will hurt the community and not necessarily increase the quality of care for patients.

I love my job and the patients that I care for. I hear firsthand about the communities struggle along with personal family troubles with the economic impact of the pandemic. Any increase to the cost of care will greatly affect the families with their continued health care. MGB has a track record of merging, acquiring or pushing out community healthcare systems and then pricing services at a higher cost, increasing the financial burden placed upon patients throughout the Commonwealth.

Marlborough Hospital is a safety net hospital & UMass Memorial is safety net system. Loss of commercially insured patients to MGB will substantially impact the fiscal viability of Marlborough Hospital which would also impact UMass Memorial Medical Center. One obvious problem that will become worse is the underpayment of MassHealth which is typically 60 to 65 cents on the dollar of the cost.

I see patients every day that tell me that they have to rely on public transportation because they struggle to make financial ends meet. They are struggling financially however they are grateful for UMass Memorial for their health care and doctor appointments. I believe that the MGB's Westborough location would not be conducive to lower income families needing public transportation.

So many of my patients express the gratefulness of following care thru family generations at UMass Memorial. They continue to go to the same doctors and surgeons that their parents went to.

My reason for working at UMass Memorial is having a patient come to the Vascular lab not able to walk due to arterial disease. They come to us and it appears that surgery is needed. The same patient comes back to the lab post-surgery and walks into the room saying that the surgery has changed their life. That is healthcare that you cannot put a price on.

I think DPH should say no to MGB's proposal for Westborough, MA.

I suggest that the additional public hearing be scheduled for after the independent cost analysis has been conducted.

I am asking the Department to require that the Health Policy Commission conduct the independent cost analysis, so it is really independent.

Kim (Mary) Latrobe Ultrasound Technologist, Vascular Lab UMass Memorial Medical Center From: <u>Kathleen</u>

To: <u>DPH-DL - DoN Program</u>

Subject: DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS

Date: Monday, April 12, 2021 4:07:41 PM

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

I am THRILLED that MGB is coming to Westborough. MGB is a world class provider and the gold standard.

Thank you.

Kathy Tournas

Kathleen ktournas@yahoo.com Westborough From: <u>Kathy</u>

To: <u>DPH-DL - DoN Program</u>

Subject: DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS

Date: Friday, April 16, 2021 4:59:10 PM

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

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

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.

Kathy lallyk9@gmail.com Hopkinton From: <u>Kathryn</u>

To: <u>DPH-DL - DoN Program</u>

Subject: DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS

Date: Wednesday, April 14, 2021 3:55:13 PM

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

As a local resident and Mass General Brigham employee, I will be ecstatic to have this ambulatory office nearby in Westborough. The MGB approach to providing care for patients particularly over the last year has developed into a large focus on coordinating care and prioritizing what makes sense for the patient in terms of how that care is set up. Sometimes that's an in person interaction, other times that's a virtual interaction. By expanding physically to Westborough, this allows those necessary in person interactions to be less cumbersome by often eliminating the need for patients to commute to Boston or in that direction in general. That makes a large difference for people that live and work in MetroWest and further west. There's a growing number of us employees that commute far distances, or are even now working remotely part or full time, and having this new site close to home will greatly enhance the patient experience. MGB's patient population continues to expand and I believe due to the pandemic and people relocating to less urban parts of the state, will continue to see further spread across the state. This new site will support patients close to home which is critical, lessening the stress of dealing with health concerns and also helping ensure those concerns are addressed more immediately. I fully support this expansion to Westborough and believe it's critical to the path towards ensuring a healthy population. Thank you for your consideration and happy to discuss further if there's a desire.

Kathryn knardozza@bwh.harvard.edu Hudson Good evening, my name is Kate Eshghi and I am the General Counsel for UMass Memorial Health Care, the safety net health system for Central Massachusetts.

The Department of Public Health is faced with the fundamental question whether the <u>State's Health Plan</u> - including critical decisions regarding <u>who</u> has access to care and at what cost – will come out of the MGB corporate offices in Assembly Square and the Prudential Building or from the Commonwealth's regulatory agencies which are ultimately accountable to the people of this State.

DPH has the regulatory authority and obligation to prevent this massive and irreversible reshaping of our State's health care landscape.

The DoN program is statutorily charged with ensuring that health care resources will be made reasonably and equitably available to every person within the Commonwealth at the lowest reasonable aggregate cost. The Department also is obligated to consider the plans, intentions and likely impacts of proposed projects to ensure that applicants are not subverting these goals.

Putting aside the obvious substantive reasons why MGB's proposed project fails to satisfy- and indeed would subvert - these requirements, I will focus on two of the technical reasons the department should reject or deny the application for failure to comply with the regulatory requirements.

First, MGB's positioning of the proposed project circumvents the Department's facility siting requirements, while maximizing opportunities to cherry pick commercial volume. MGB's application is legally deficient because MGB has not established that the proposed new surgicenter is <u>not</u> in the primary service area of an independent community hospital or that such protected community hospital has submitted a letter of support or entered into a joint venture to run the new center as the DoN regs require. Before proceeding, DPH must first establish - through a public and accountable process - the necessary sub-regulatory guidance defining "Primary Service Area." Without doing so, DPH cannot determine whether MGB has satisfied this requirement which is designed to support the viability and survival of independent community hospitals.

More fundamentally, DPH should not approve MGB's massive proposed project to reshape the ambulatory care landscape in the absence of <u>the legislatively mandated state health plan</u>. The DoN Program cannot act to advance the state's goals of ensuring appropriate allocation of healthcare resources, increased and equitable access and lower cost <u>in the absence of such a health plan</u>.

The Department must stop this proposed project until the State Health Plan is finalized or equitable access to services for communities who are underserved and most at risk, including those covered by MassHealth, will continue to take a backseat to MGB's strategy to dominate the commercial pay market. A decision by DPH to permit MGB to proceed with this project will

permanently and irreversibly transfer decision making regarding the future of health care in Massachusetts from public agencies to the corporate offices of a single powerful system.

In my final moments I would like to emphasize two aspects of the health disparities concerns so many are raising:

We recognize that there are many committed and talented people within MGB working on issues of diversity, equity and inclusion and that MGB has stated that it intends to bring "DEI programming" to the new locations. This is not about individuals or programs, but about the structural and institutional inequity resulting from a corporate decision by the Commonwealth's largest and wealthiest health care system to invest billions of dollars in affluent and predominantly white communities that already have good access to health care when other communities lack such access.

When we raise concerns about racial disparities, we do so recognizing that Westborough has significant Asian communities and that anti-Asian bias is widespread. At the same time, the COVID public health crisis has underscored specific and devastating health disparities impacting the Latino/Hispanic, Black/African American and American Indian residents of our Commonwealth and nation. MGB's corporate expansion plans do nothing to address these disparities but instead reflect, perpetuate and deepen them by prioritizing investment in communities where relatively few Black, Latino and American Indian residents live.

From: Karen

To: <u>DPH-DL - DoN Program</u>

Subject: DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS

Date: Monday, April 05, 2021 8:04:17 PM

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

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

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.

Please allow MGB to put a facility up in Westborough. I have been in the MGB network for 20+ years and intend to stay in it. I am a senior and have more and more difficulty getting into Boston as I age. Having access to my network close to home would be such a comfort. I would also be more likely to go for care if it is nearby. Please let them build!

Karen kmanning_3@yahoo.com MARLBOROUGH

Hi, my name is Kait Urlaub and I reside in Worcester, MA.

Thank you for allowing me to voice my concerns regarding MGB's expansion plans and their intent to establish an outpatient center in Westborough, MA.

I've been a caregiver at UMass Memorial Health for the last 6 years and I am a proud member of the Talent Acquisition team.

As Senior Director, my team and I are responsible for the recruitment of new caregivers to join our health system from clinical facing roles such as ambulatory service representatives, radiology techs, respiratory therapists, and RN's to professionals in IT, Revenue Cycle and HR. We get to be a part of life changing moments as we offer new positions to candidates to join our caregiver team. Many of our caregivers are inspired by our mission and are attracted to our organization as we are designated as a safety net hospital system which means we care for the most vulnerable patients in MA. We provide the same high-quality care regardless if you have insurance or do not. There are only 6 in the state of MA, none of which are part of MGB.

I have serious concerns with the expansion of MGB into Westborough as it will have a negative impact on the local talent market as well as on the financial viability of our critical community institution. Many of our candidates live and work within our community. This expansion effort is aimed at gaining market share and driving commercially insured patients away from UMass Memorial Health.

MGB's expansion will make the local talent market more competitive and will have a negative impact on the teams of caregivers that we have built at UMass Memorial Health. Our costs related to recruitment and turnover will increase significantly as the teams at MGB will look to local experienced talent for their openings. They've already started this action by mailing thousands of flyers this past weekend to the surrounding community, which included a URL to stay in touch which includes receiving more information about upcoming careers fairs. Higher numbers of vacancies will not only increase our financial costs but will also have a negative impact on our caregivers related to burnout and engagement. While our caregivers are resilient in the pursuit of healing for our patients, we are not immune to burnout due to vacancies.

I believe that this expansion will threaten our local talent and their jobs as well as our financial viability as a safety net and I am respectfully asking the Department to require that the Health Policy Commission conduct the independent cost analysis. I am also requesting that an additional public hearing be scheduled for after the independent cost analysis has been conducted.

From: Julie

To: <u>DPH-DL - DoN Program</u>

Subject: DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS

Date: Monday, April 12, 2021 10:10:38 AM

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.

Julie jsquires@me.com Westborough

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

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

Dear Ms. Szent-Gyorgyi:

Thank you for the opportunity to comment on Mass General Brigham's (MGB) plans to expand into Central Massachusetts and establish an outpatient center in Westborough. My name is Julie Ozaydn, M.D., and I am a primary care provider at Marlborough Hospital/Umass Memorial. I have been caring for residents of Westborough, Marlborough and Central Massachusetts for 24 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.

Addressing heath inequities has been one of my strongest values as a physician. I have been proud to be a part of the medical community of Marlborough Hospital and UMass Memorial Healthcare because of their mission to provide care to everyone, regardless of type of insurance or ability to pay. This is what drew me to this practice and what has kept me here for so many years.

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 preexisting 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,

Julie Ozaydin, M.D.

From: <u>Joshua</u>

To: <u>DPH-DL - DoN Program</u>

Subject: DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS

Date: Saturday, April 03, 2021 11:20:00 AM

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.

Joshua jloban@yahoo.com Westborough



157 Union Street Marlborough, MA 017 5 2

www.umassmemorial.org

April 12, 2021

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

Dear Ms. Szent-Gyorgyi:

My name is John Kelly and I am the chief nursing officer and the chief operating officer at UMass Memorial - Marlborough Hospital. I oversee all aspects of the hospital including the emergency department, med/surg unit, behavioral health, ICU, diagnostic imaging, rehabilitation services, surgical services and pharmacy. We are committed to patient-centered, safe and high-quality care delivered by caregivers who are compassionate, caring, dedicated and highly skilled. We care for every patient who comes through our doors as if they are a family member. We do not discriminate against any patient for any reason: the ability to pay, socioeconomic status, race, gender, age or ethnicity.

We work extremely hard everyday to provide exceptional care with excellent outcomes. We monitor all of our safety, quality and patient experience metrics every day and this concentrated and deliberate focus has earned us the grade of A for quality and safety from the Leapfrog Group and a four-star rating from CMS.

I am very, very concerned about the impact the MGB expansion into Westborough will have on our patients, our caregivers and our community. Many of the services that are being proposed for the Westborough site are identical to the services that we offer at Marlborough Hospital and at our outpatient sites. As a safety net hospital, we rely on commercially insured patients to help offset the costs of providing care to the public payor patients. We will be competing for the same patients and may be faced with making difficult decisions about reducing some of our services if they are not profitable or break even. This is of grave concern for both our inpatient and outpatient behavioral health services. Our behavioral health services are offered to an extremely vulnerable population and which is already a shortage of services.

Aside with competing with MGB for patients, we will also be competing with MGB for skilled health care workers who care and treat these patients. I respectfully disagree that MGB will be bringing new jobs to the region. I believe that they will be recruiting caregivers from other health care facilities causing job losses at hospitals such as Marlborough Hospital and UMass Memorial Medical Center. There is already a tremendous shortage in many professions such as nursing, imaging, medical assistants, physical therapists, OR and lab technologists to name a few.

In closing, I am asking that the DPH do an independent cost analysis by the Health Policy Commission and continue to hold public hearing following the release of the cost analysis.



<signature on file>
John G. Kelly, RN
Chief Operating Officer/Chief Nursing Officer

From: <u>Joanne</u>

To: <u>DPH-DL - DoN Program</u>

Subject: DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS

Date: Wednesday, April 07, 2021 1:09:45 PM

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

As a local resident 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.

Joanne jojoh@townisp.com Shrewsbury From: <u>Joanna</u>

To: <u>DPH-DL - DoN Program</u>

Subject: DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS

Date: Friday, April 16, 2021 4:51:12 PM

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

As a resident of Southborough and an MGH employee, I fully support a new health care center in Westborough. We love our MGB providers and it would be great to have the option of seeing them closer to home instead of having to go into Boston for the services. As a nurse in a clinic with many satellite locations out the in community, I have seen firsthand how helpful expanding access into the community setting can be. I am very excited about the prospect of a new facility in my area!

Joanna jneas@partners.org Southborough From: jl

To: <u>DPH-DL - DoN Program</u>

Subject: Fw: MGB support for Westborough **Date:** Thursday, April 08, 2021 2:11:54 PM

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

I support MGB coming to Westborough. It brings competition to the area, which has been dominated by UMASS. It will lower prices and make health care more affordable for lower income levels. UMASS has had a monopoly long enough. The public arguments against it are simply socialized medicine advocates trying to argue that better insured people need to support the under insured. We already have that with the ACA.

Sent from Yahoo Mail on Android



Jay B Krasner, MD, FACP

111 Boston Post Road Suite 107 Sudbury, MA 01776

Fax: (978) 443-4634 www.waysidehealth.com

15 April 2021

VIA EMAIL <u>DPH.DON@MassMail.State.MA.US</u>

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

Dear Ms. Szent-Gyorgyi:

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

My name is Jay Krasner, and I am a member of the Board of Directors of the MetroWest Health Care Alliance Physician Organization. I have been a community primary care physician in solo private practice in this area for over 30 years. On behalf of our organization, which represents over 200 independent and employed providers, across all specialties and primary care, as well as personally, I would like to express my concern with regard to the above.

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

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

Losing a substantial number of commercial patients to MGB will disrupt the existing payor mix that enables local health systems to maintain operations and deliver high-value care to MassHealth patients, the indigent and others with various obstacles to obtaining health care services. This could encourage community providers to limit services, transition to a concierge model, relocate and/or retire prematurely. The paradoxical effect would be to reduce rather than enhance access to health care services, and consequently, promote establishment of an MGB monopoly in this region, with higher overall cost.

It is my understanding that the Determination of Need process was established to ensure the appropriate allocation of healthcare resources. There is not enough community demand to warrant MGB's expansion into Westborough, contradicting the goals of that 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. MGB's proposed services are not only redundant, but also jeopardize the high-value services existing in our communities today.

Thank you for heeding the voices of local concerned providers in this area, and thank you for your attention to this matter.

Sincerely,

Jay B. Krasner, MD, FACP

From: Jing

To: <u>DPH-DL - DoN Program</u>

Subject: DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS

Date: Friday, April 16, 2021 9:29:37 AM

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.

Jing windflower_88888@hotmail.com Westborough

From: Jing

To: <u>DPH-DL - DoN Program</u>

Subject: DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS

Date: Friday, April 16, 2021 4:29:27 PM

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

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

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.

Jing jing_lin8500@msn.com Westborough From: <u>JEFFREY</u>

To: <u>DPH-DL - DoN Program</u>

Subject: DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS

Date: Friday, April 16, 2021 4:41:32 PM

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

I strongly believe providing more options improves quality and reduces cost in almost all enterprises. I am confident the new Westborough facility will improve services to the general community including the underserved and under insured. I support the Mass General Brigham project and ask the Department of Public Health to approve this application.

.

I made a decision decades ago to select a primary care physician at Newton Wellesley hospital near my job. Since then I have been very satisfied with the services provided and have added several specialists there to my health care team. Bringing this new facility to my area in a non-hospital setting allows me to continue with my relationship with the expanded Mass General Brigham organization (that now includes Newton Wellesley) with more convenience and added local services. I am sure there are others like me that will enjoy the same benefits.

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.

JEFFREY ward.jeff@verizon.net Westborough
 From:
 Zivny, Jaroslav

 To:
 DPH-DL - DoN Program

Subject: Testimony - Mass General Brigham Incorporated - Multisite - 21012113-AS

Date: Tuesday, April 13, 2021 9:17:29 AM

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, 6th Floor Boston, MA 02108

Dear Ms. Szent-Gyorgyi:

Thank you for the opportunity to comment on Mass General Brigham's (MGB) plans to expand into Central Massachusetts and establish an outpatient center in Westborough. My name is Jaroslav Zivny and I am a Gastroenterologist at UMass Memorial Health and Marlborough Hospital. I have been proud to care for residents of Westborough, Marlborough and Central Massachusetts for over 15 years. Our local hospital and health system is a longstanding community resource, providing emergency care as well as a range of inpatient and outpatient medical, surgical and ancillary services.

As a provider committed to delivering high-quality care at exceptional value, I am deeply concerned that MGB's Westborough proposal will threaten our essential local care institutions and exacerbate health inequities in our region. MGB is choosing to expand into high-income communities that are already well-served by existing providers, rather than into communities in need of quality care options. There are 13 health facilities within a 10-minute drive of the proposed site which provide the same services as those planned for MGB's ambulatory care facility. Furthermore, there are 47 health provider locations, including three hospitals and an ambulatory surgery center, only 20 minutes away from the Westborough site.

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

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

To further examine this proposal's effect on local care and health equity, I respectfully request that

the Department of Public Health require the applicant to hold another public hearing, after the completion of an independent cost analysis. To ensure it is truly independent, I also ask the Department to require that the Health Policy Commission conduct the independent cost analysis.

Thank you for your attention to this important matter.

Sincerely,

Jaroslav Zivny, MD

The information transmitted is intended only for the person or entity to which it is addressed and may contain confidential and/or privileged material. Any review, transmission, re-transmission, dissemination or other use of, or taking of any action in reliance upon this information by persons or entities other than the intended recipient is prohibited. If you received this in error, please contact the sender and delete the material from any computer.

From: <u>Janet Wilder</u>

To: <u>DPH-DL - DoN Program</u>

Subject: Determination of Need ("DoN") Application Project #21012113-AS – Mass General Brigham -- Opposed

Date: Thursday, April 15, 2021 9:12:32 PM

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

My name is Janet Wilder from Arlington, Mass. I'm an Organizer with the SHARE Union. SHARE represents over 3000 healthcare workers at UMass Memorial Medical Center and UMass Memorial Marlborough Hospital. We are Nursing Assistants and Mental Health Counselors, Secretaries and Schedulers, Xray Techs and Respiratory Therapists, and many more.

Thank you for the opportunity to voice SHARE members' serious concerns about the proposed expansion of MGB to Westborough.

We ask DPH to answer two important questions before approving this expansion:

- 1. Is this proposed MGB facility really just for current MGB patients? It sure looks too big for that, to me. SHARE members at Marlborough Hospital are quite worried, I believe legitimately, that an MGB expansion in Westborough would pull mostly privately insured patients away from Marlborough Hospital, and would lead to closing services and layoffs there over time.
 - Is it really OK for MGB to spend millions of dollars to build new clinics to take away jobs from healthcare workers at our safety net hospitals? Think about the upheaval that layoffs bring to individuals and their families, not to mention the losses in wages, pensions, etc. These are good local jobs with good benefits don't let MGB put them at risk.
- 2. The second question that SHARE members need DPH to answer is this: Will a new MGB facility raise the cost of healthcare in our region? SHARE members work hard to make our hospitals run smoothly and efficiently to deliver quality care at an affordable price for our patients. As a union, we sit down and negotiate over health insurance for our members. When the cost of health benefits go up, it's harder for us to negotiate a raise for our members, which is a big deal if you're living paycheck to paycheck.

Everything I've read about MGB makes it sound like where ever they go, the cost of care goes up. We need to know from the Health Policy Commission if that's what would happen here. If the MGB expansion

would raise the cost of our healthcare, then SHARE members urge DPH to say no.

On behalf of over 3000 SHARE members and their families, we urge DPH to protect existing good local jobs and to keep the cost of our health care from increasing unnecessarily. That means taking a really close look at the MGB proposal, asking the Health Policy Commission to do a truly independent cost analysis, and then making the right decision.

Thank you.

Janet Wilder SHARE Organizer

www.theshareunion.org 26 Peck Avenue Arlington, MA 02476 From: <u>James</u>

To: <u>DPH-DL - DoN Program</u>

Subject: DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS

Date: Monday, April 12, 2021 4:05:49 PM

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

As a local resident and a patient of Brigham and Women's Hospital, 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. For example, I have benefited enormously from the Dana Farber Clinic in Milford.

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

Best, Jim Balschi

James balschi@verizon.net Hopkinton From: <u>Jaclyn</u>

To: <u>DPH-DL - DoN Program</u>

Subject: DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS

Date: Friday, April 16, 2021 4:46:06 PM

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

As a local resident 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.

As a life long patient of the MGB system, I think it is long overdue to extend the care that can be offered by MGB in this area, west of the city. To have care within reach in the community will allow for better access to healthcare with providers that are affiliated with a well trusted organization.

I have always driven to receive care by the MGB system, however there are times that the commute has led to missed appointments or pushed off care. If the care that is trusted is right my backyard it is that much easier to ensure these things don't continue to happen. Additionally having a care center with multiple specialty providers, surgery and other ancillary services, allow for nervous patients, like myself to ease their concerns of entering a hospital by avoiding that all together.

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 greatly 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.

Jaclyn jdeasy@partners.org Marlborough From: <u>J Bruce</u>

To: <u>DPH-DL - DoN Program</u>

Subject: DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS

Date: Saturday, April 03, 2021 11:20:56 AM

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.

J Bruce jbgabriel@aol.com Marlborough From: <u>Ira Skolnik</u>

To: <u>DPH-DL - DoN Program</u>

Subject: STRONGLY opposed to MGB expanding to Central Massachusetts....

Date: Tuesday, April 13, 2021 2:26:37 PM

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

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

Dear Ms. Szent-Gyorgyi:

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

My name is Dr. Ira Skolnik and I am a Pediatric Dermatologist at Marlborough Hospital. I have been proud to care for residents of Westborough, Marlborough and Central Massachusetts for 19 years. Our local hospital and health system is a longstanding community resource, providing emergency care as well as a range of inpatient and outpatient medical, surgical and ancillary services.

As a provider committed to delivering high-quality care at exceptional value, I am deeply concerned that MGB's Westborough proposal will threaten our essential local care institutions and exacerbate health inequities in our region. MGB is choosing to expand into high-income communities that are already well-served by existing providers, rather than into communities in need of quality care options. There are 13 health facilities within a 10-minute drive of the proposed site which provide the same services as those planned for MGB's ambulatory care facility. Furthermore, there are 47 health provider locations, including three hospitals and an ambulatory surgery center, only 20 minutes away from the Westborough site.

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

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

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

Health Policy Commission conduct the independent cost analysis.

Thank you for your attention to this important matter.

Sincerely,

Ira L. Skolnik, M.D., Ph.D. (iskolnik@msn.com /