

From: [Brian](#)
To: [DPH-DL - DoN Program](#)
Subject: DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS
Date: Wednesday, April 14, 2021 4:04:13 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 resident of Shrewsbury and also a Mass General Brigham employee who travels to Boston every day, I would greatly welcome the option to have a new MGB outpatient center in close proximity to where I live. Because of my commute, I split my care across two healthcare systems according to what my schedule allows - I see MGB providers for some health issues when I need to remain close to work for the day, and I see providers outside of MGB when I need to remain close to home. This type of fragmented care is inconvenient for me personally, and is not the best way to practice medicine.

As I understand it - the proposed outpatient center will provide surgery, primary care, behavioral health, orthopedics, neurology, diagnostic imaging and other specialty care. Having an MGB solution in my "backyard" will allow me to consolidate all of my care into one enterprise, which is more convenient, more efficient, and my preference. I will no longer have to request medical records from one system to be sent to another, and I will have access to physicians and services that I know and trust.

I fully support this endeavor and hope to consolidate my care under one roof with this option.
Thank you,
Brian McIntosh

Brian
bmcintosh1@bwh.harvard.edu
Shrewsbury

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

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

Dear Ms. Szent-Gyorgyi:

Thank you for the opportunity to share my objections to Mass General Brigham's plans to establish an outpatient center in Westborough, and its potential to worsen health inequities in Central Massachusetts.

I am proud to work at Community Healthlink, a mission-driven organization that has helped adults, children, and families recover from the effects of mental illness, substance use, and homelessness since 1977. We are committed to serving some of the most marginalized members of our community, many of whom have been victimized or experienced significant trauma throughout their lives.

Because other providers can select patient populations based on payor, and often only take a small percentage of patients on government plans like MassHealth, many of the people we treat cannot seek care elsewhere.

If MGB expands into Westborough, I am concerned it will further create a two-tier healthcare system in Massachusetts that leaves access and services for our most vulnerable residents behind. People with commercial insurance living in more affluent areas will opt to go to the new Westborough facility for treatment. This means resources that would have otherwise gone to community health systems and areas of need will migrate elsewhere.

MGB's expansion presents a problem of sustainability for community providers who care for those no one else is willing to serve. If our local hospitals and health systems lose a substantial number of commercial patients to MGB, they may be forced to close or reduce much needed medical services to remain financially viable. Worcester and its surrounding communities have an entire population already grossly underserved and will be left wanting for behavioral health support, substance use disorder treatment, housing, and other essential care. We cannot exacerbate these disparities by introducing a new facility that cherry picks our region's most privileged residents.

To fully understand this proposal's impact on health equity, I respectfully request that the Department of Public Health require the Health Policy Commission to conduct the independent cost analysis. I also ask that DPH hold another public hearing once the analysis is complete.

Thank you for your attention to this important issue.

Sincerely,

Elizabeth Louder

Elizabeth Louder

From: [bisceglia](#)
To: [DPH-DL - DoN Program](#)
Subject: DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS
Date: Saturday, April 03, 2021 11:28:21 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.

bisceglia
biscegliat@gmail.com
Shrewsbury

From: [Betsey](#)
To: [DPH-DL - DoN Program](#)
Subject: DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS
Date: Monday, April 05, 2021 8:08:20 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 which this site will provide.

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

Betsey
betseymc@comcast.net
Marlborough

From: [Betsey](#)
To: [DPH-DL - DoN Program](#)
Subject: DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS
Date: Monday, April 05, 2021 8:08:45 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 closer to home, which this site will provide.

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

Betsey
betseymc@comcast.net
Marlborough

From: [Betsey](#)
To: [DPH-DL - DoN Program](#)
Subject: DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS
Date: Monday, April 05, 2021 8:10:53 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 in Boston closer to my home. We need more access to the highest quality of care in our community, both primary care and specialty care, which this site will provide.

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

Betsey
betseymc@comcast.net
Marlborough

From: [Jennifer](#)
To: [DPH-DL - DoN Program](#)
Subject: DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS
Date: Friday, April 16, 2021 4:43:26 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, Mass General Brigham employee and patient of Mass General Brigham, 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.

Jennifer
jbasgaard@gmail.com
SHrewsbury

From: [Nalbandian, Ari](#)
To: [DPH-DL - DoN Program](#)
Subject: Testimony - Mass General Brigham Incorporated – Multisite - 21012113-AS
Date: Tuesday, April 13, 2021 2:57:36 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 Ari Nalbandian, and I am an emergency department physician at Marlborough Hospital. I have been proud to care for residents of Westborough, Marlborough and Central Massachusetts for 5 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,

Ari Nalbandian MD

Assistant Professor of Emergency Medicine

University of Massachusetts

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: [Barbara](#)
To: [DPH-DL - DoN Program](#)
Subject: New facility
Date: Thursday, April 08, 2021 7:29:11 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 client of MGB I fully support this new facility in Westborough. I have rarely accessed UMass for health care and I always go to MGB in Natick, Newton or Boston. I look forward to a Westboro location.

Regards,
Barbara Millett
Westborough

From: [Barbara](#)
To: [DPH-DL - DoN Program](#)
Subject: DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS
Date: Friday, April 16, 2021 4:37:10 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.

Barbara
barbaraawad@gmail.com
Westborough

From: [Parulkar, Bhalchandra](#)
To: [DPH-DL - DoN Program](#)
Cc: [Parulkar, Bhalchandra](#)
Subject: Testimony - Mass General Brigham Incorporated – Multisite - 21012113-AS
Date: Tuesday, April 06, 2021 8:53:22 AM
Importance: High

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 Dr. B G Parulkar. 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 and day surgery center in Westborough.

I am a urologist in community practice in Marlborough. I live in Northborough. My wife, who is a primary care physician in the community, and I have been living and actively contributing to the local community for over 25 years.

I have been an active member of the medical community since 1993.

I currently serve as a President of the medical staff at Marlborough Hospital and have been working in University of Massachusetts Medical Center hospitals for 28 years. Being affiliated with a safety net healthcare provider, I have serious concerns about how MGB's proposed expansion will impact health equity and the cost of care.

One of the tenets of good local care is covering all emergency care patients in acute care hospitals, without regard for their ability to pay. When you practice in only an office setting, you select patients who are insured. The care of under and uninsured patients is often turfed to local hospitals and physicians.

The MGB specialists and doctors that are slated to work out of the proposed Westborough facility will not be available to cover the emergency care of the patient – these facilities are intended to target commercially insured patients and provide services that are more expensive than the same services already being offered by local healthcare facilities.

MGB already has a very large footprint in the state of Massachusetts. Through their multibillion-dollar expansion in Boston, they are creating capacity to serve more patients. Since the Boston market is already accounted for, their simultaneously-timed expansion into the wealthiest, least diverse suburbs is to bolster its pipeline of referrals into Boston. If this were not the case, why wouldn't they set up these centers in Fall River, Lawrence and other underserved western Massachusetts towns where there are very limited health care services?

MGB's three proposed sites already have high value local healthcare systems, which are actively taking care of local need – like UMass Healthcare, Tenet Healthcare and Milford Regional Medical Center (which is already an MGB affiliate) in the Westborough area. Adding one more center that will only cherry pick patients does not make it a social necessity.

By definition, these peripheral, small satellites and surgical centers are a cover to do bread and butter common surgeries, common diagnostic procedures and common labs under MGB's big monopolistic umbrella. This will surely drive up the cost of care and expand the market share of MGB. Health care costs are already on the rise and allowing MGB to conduct procedures at its high reimbursement rates in suburban central Mass. and other similar communities will drive up costs for all people across the Commonwealth.

This expansion would endanger the viability of local community hospitals, such as Marlborough Hospital and Framingham Metro West Hospital, and lead to the loss of key employees and support staff, undermining the viability of critical community care institutions.

I respectfully request that the Department of Public Health require the applicant to hold another public hearing with adequate notice on this application after the independent cost analysis has been conducted. I also request that the Department of Public Health charge the Health Policy Commission with conducting the independent cost analysis.

Without local care, there will be no just care and healthcare disparities that have been so evident throughout the COVID-19 pandemic will only become worse.

B.G. Parulkar, MD

President of the medical staff

Marlborough hospital, 157, Union street, Marlborough MA 01752

April 8, 2021

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

Dear Director Szent-Gyorgyi:

I have been a patient of the Mass General Brigham for more than 10 years. Since I am a longtime resident of Shrewsbury, MA, I am very excited that Mass General Brigham will be opening a new health care center in Westborough.

I had been a patient at UMass Medical Center for several years. Although I had a wonderful primary care physician, on the two occasions when I needed to be referred to a specialist it took months of waiting and delays.

However my patient care experience at Mass General Brigham has been the exact opposite. Whenever my primary care physician referred me to a specialist, it was just a matter of weeks or less before I was seen and treated. These specialists have included: Cardiology, Ophthalmology, Dermatology, Podiatry, Endocrinology and Surgery.

As resident of Central Massachusetts, I am very supportive of Mass General Brigham's decision to open this outpatient facility in Westborough. I hope the Massachusetts Department of Public Health will approve the Mass General Brigham's request to establish this important healthcare facility.

Respectively,

Arnold (Arnie) H. Wensky
73 Orchard Meadow Drive
Shrewsbury, MA 01545
arniewensky@gmail.com

4/8/21

Comment

Ann Karnofsky
132 E. Main St.
Hopkinton MA 01748

Send to DPH Boston
Millsborough

Dear DoN Support: 80 year old + healthy

I am distressed by the limiting of Leonard Morse Hospital (of the Metrowest duo combination in Natick + Framingham) to psychiatric. I find the Framingham campus not adequate, crowded, and inferior (as many from Natick have quit).

I have of choice of unsatisfactory Milford, Metrowest of Framingham, and too far Newton Wellesley. I live in Hopkinton and do not drive.

There is a real need for the MBH locations which has nothing to do with Worcester. I have only Medicare. I have heard bad stories about U. Mass hospitals' care.

Sincerely yours, Ann Karnofsky

4/8/21 (received 4/13/21)

Comment

Ann Karnofsky
132 E. Main Street
Hopkinton, MA 01748
[REDACTED]
80 years old & healthy

Send to DPH Boston & Marlborough

Dear DON Support:

I am distressed by the limiting of Leonard Morse Hospital (of the Metrowest duo combination in Natick & Framingham) to psychiatric. I find the Framingham campus not adequate, crowded, and inferior (as many from Natick have quit).

I have of choice of unsatisfactory Milford, Metrowest of Framingham, and too far Newton Wellesley. I live in Hopkinton and do not drive.

There is a real need for the MGH locations, which has nothing to do with Worcester. I have only Medicare. I have heard bad stories about U. Mass hospitals' care.

Sincerely yours, Ann Karnofsky.

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 Andrew Milsten and I am an ER physician at Marlborough Hospital. I have been proud to care for residents of Westborough, Marlborough and Central Massachusetts for 12 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,



Dr. Andrew Milsten

4/16/2021

From: [Prince, Amy \(Marlborough\)](#)
To: [DPH-DL - DoN Program](#)
Subject: Testimony - Mass General Brigham Incorporated – Multisite - 21012113-AS
Date: Tuesday, April 13, 2021 10:26:31 AM

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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 Amy Prince MD and I am a psychiatrist at Marlborough Hospital. I have been proud to care for residents of Westborough, Marlborough and Central Massachusetts for 18 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,

Amy Prince MD

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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 Amy Costigan, MD and I am Chief of Emergency Medicine at Marlborough Hospital. I have been proud to care for residents of Westborough, Marlborough and Central Massachusetts for seven 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,

Amy Costigan, MD

From: [Amit](#)
To: [DPH-DL - DoN Program](#)
Subject: DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS
Date: Monday, April 05, 2021 8:54:30 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.

Amit
amitbhandari5@hotmail.com
Northborough

From: [Amanda](#)
To: [DPH-DL - DoN Program](#)
Subject: DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS
Date: Friday, April 09, 2021 2:29:51 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.

On a personal note, my husband and I are most grateful for the excellent care we have received from Mass General Brigham over the years.

To have a facility closer to our home as we age would be a tremendous plus. I know that many others in our community would benefit from this project as well.

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.

Amanda
amandachristie@verizon.net
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 Alexandra Nordberg and I am an Emergency Physician at Marlborough Hospital. I have been proud to care for residents of Westborough, Marlborough and Central Massachusetts for the past six 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. In a time where we need to focus on health equity, this is not the answer.

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,

A handwritten signature in cursive script, appearing to read "A Nordberg", written in a reddish-brown ink.

Alexandra Nordberg, MD



WORCESTER REGIONAL
CHAMBER OF COMMERCE
RECRUIT | RETAIN | INCUBATE

Sent Via Email: DPH.DON@MassMail.State.MA.US

April 8, 2021

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

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

Dear Ms. Szent-Gyorgyi,

Please let this letter serve as a transcript of my testimony from the April 6, 2020 hearing for the above referenced.

Good evening my name is Alex Guardiola, I am the director of government affairs and public policy for the Worcester Regional Chamber of Commerce. I want to thank you all for your time tonight.

The Worcester chamber is the largest chamber in New England servicing over 2000 members in 35 communities. I am here to speak on behalf of the Chamber in opposition to the expansion of MGB into the Westboro site. Worcester is historically a very diverse community with responsible hospital administrators. This expansion into Westborough is not indicative of the needs for this region and is based primarily on access to dollars of more affluent communities in MetroWest and the 495 corridor.

This expansion will hinder much of what the Worcester region has been working towards for decades. If approved, it would take jobs out of the community, make healthcare access to some of the low to moderate income folks unattainable, and would increase rates of our insured in our area.

311 Main Street, Suite 200 • Worcester, Massachusetts 01608

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AFFILIATE CHAMBERS OF COMMERCE

Auburn | Blackstone Valley | Central Mass South Chamber | Wachusett Area | Webster Dudley Oxford

Due to the economic impact of the pandemic, many Massachusetts families and individuals are just barely making ends meet. Still, healthcare costs continue to climb. According to the 2021 CHIA Report, total health care expenditures in Massachusetts rose 4.3 percent in 2019, exceeding the 3.1 percent benchmark, to \$64.1 billion. Any increases to the cost of care are unacceptable and untenable.

MGB has a track record of merging, acquiring or pushing out community healthcare systems and then pricing services at a higher cost, thereby increasing the financial burden placed upon patients across the Commonwealth.

There are 13 health facilities within a 10-minute drive of the proposed site which provide the same services as those proposed for MGB's ambulatory care facility. And within just 20 minutes from the Westborough site, there are 47 health provider locations. Additionally, higher costs would severely hurt our small businesses in our region.

We believe that there is not enough community demand to warrant MGB's proposed expansion into Woburn, Westborough and Westwood and that approving MGB's applications would threaten the future of community hospitals.

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 fully understand the impact of this proposal, I suggest that the additional public hearing be scheduled after the independent cost analysis has been conducted.

We again thank you for your time this evening and hope that our concerns are accurately heard.

From: [Ledwith, James](#)
To: [DPH-DL - DoN Program](#)
Subject: Testimony re DON for MGB expansion to Westborough
Date: Tuesday, April 6, 2021 10:05:45 PM

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To: Lara Szent-Gyorgyi

Director, Determination of Need Program

Massachusetts Department of Public Health

250 Washington Street, 6th Floor Boston, MA 02108

I respectfully request that the following expanded notes be added to my recorded testimony at the public hearing on April 6, 2021.

My name is Dr. James Ledwith, a family physician in the UMass Memorial Medical Group in Worcester, and a 15-year member of the faculty of the University of Massachusetts Medical School. My home is in Franklin, MA. 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 due to the potential impact on cost of care and health equity.

My primary care practice serves a diverse panel of patients, many with chronic illness, and I particularly focus on care for chronic pain and substance use disorder. I also serve the UMass Memorial Health System as a consultant to improve systems of care for patients with chronic pain. I am also a consultant for the Massachusetts Consultation Service for Treatment of Addiction and Pain (MCSTAP), a tremendous statewide resource to healthcare providers funded by EOHS. I teach medical students and family medicine residents who are preparing to enter primary care practices. In my 15 years at UMass including 8 years as a residency program director, I counseled many dozens of young physicians about their career and practice options. I have serious concerns about how MGB's proposed expansion will impact equity and access to primary care in the impacted communities. Recruitment of family physicians to a practice that strongly targets high revenue from commercially insurance patients over those on MassHealth and other public programs.

Sixteen years ago, I began exploring options for practice in Massachusetts. I had served a rural, underserved region of Virginia as a community family physician for 19 years but felt the need to return to Massachusetts to be closer to my aging parents. I canvassed practice opportunities across Massachusetts and was struck by the need for family physicians in virtually every community of the Commonwealth. I was also struck by the differences in the way health systems recruited and utilized their primary care providers and invested in integration of care between community family physicians and their specialty services. Many systems managed primary care practices as funnels to subspecialty services, as we have heard MGB hopes to do, with limited resources for comprehensive care. I ultimately accepted a position practicing and teaching in a UMass family medicine residency program, one of many UMass Memorial sites dedicated to comprehensive care for underserved communities.

Mass General Brigham (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. I've experienced this costly trend firsthand. Several years ago, during my wife's terminal illness, I investigated practice care options closer to my home in Franklin. The Milford Regional Medical Center's medical group had recently affiliated with Partners HealthCare – now known as MGB. Their provider reimbursements went up drastically, with the medical group president claiming at least 30% higher payments. Having devoted my entire career to

equity in access to primary care, I was frankly horrified by the tone of the recruitment message that one could get paid more for providing less service to one's community. MGB's entrance into my community exacerbated healthcare costs without improving the quality of care and it will do the same here, where our community is already well served by high value, lower-cost health providers. MGB's expansion into Westborough will increase the cost of care while decreasing essential resources for the broader community. A select few may obtain easier access to highly specialized services but most of those individuals will be funneled to Boston. What about quality care for patients in need of a primary care physician who welcomes their public health plans? What about access when physicians see 20-30% fewer patients because they get paid so much more for the few they see?

MGB's outpatient services are anywhere from 30% to 100% higher in pricing than Marlborough Hospital's, depending upon the patient's insurer and facility of choice. Their physician pricing is also anywhere from 14% to 59% higher than UMMCH Medical Group's. MGB may argue that services at a new outpatient facility may be less than in their hospital facilities, but the costs will still be dramatically higher than those of the existing local care providers. According to the 2021 CHIA Report, total health care expenditures in Massachusetts rose 4.3 percent in 2019, exceeding the 3.1 percent benchmark, to \$64.1 billion. Any further increases to the cost of care are unacceptable and untenable.

I also have grave concerns that MGB's expansion will worsen pre-existing health disparities. MGB has made no substantial indication that it is committed to delivering care in low-income communities. The proposed MGB Westborough site is in a high income, predominantly white, mobile, commercially insured community that is not easily accessible to residents of low-income communities with barriers to health care. MGB will be drawing commercially insured patients away from local providers who rely on that care to subsidize patients that are insured by public programs, such as Medicare or Medicaid, or who are uninsured.

Please allow me to emphasize my concerns about access to care for challenging health conditions for which physician and health system revenue has been modest at best. UMass Memorial Health System is actively investing in preparing its medical group to meet the demands of the opioid crisis, the public health emergency that preceded and continues amid the great COVID pandemic. UMass Memorial is providing no cost training to physicians across the region in practice-based treatment of opioid use disorders. I am tasked with proactively consulting with UMass practices to improve practice systems and management of chronic pain. Such nonrevenue initiatives that promote the public health are not feasible in a system that is stressed by diversion of services to remote health systems that are not investing in the community and its specific public health needs.

As a MCSTAP Consultant, I have worked with many of the MGB primary care physicians in their efforts to address addiction and pain in their practices. The medical group has an outstanding group of addiction and pain specialists in Boston, but the system does not provide their community primary care practices beyond the hospitals with resources to include these needed services in primary care. Conversely, the UMass Memorial Health System is actively encouraging and supporting integration of evidence-based pain and substance use treatment in its community practices. Our local providers will attempt to serve those patients even if their commercial volume is negatively impacted by MGB. However, these providers may be financially forced to close much needed medical services, resulting in reduced safety net care for our communities' most vulnerable patients if MGB cherry picks the most privileged.

"Cherry picking" high revenue patients will directly harm the healthcare facilities serving the local community and it must be discouraged. It saddens me to use this phrase, but it is becoming pervasive across healthcare where a profit motive drives inequity and access to care. Targeting outreach to high-income, predominantly white communities that are insured with higher paying health plans, at sites not easily accessed by public transportation, will inherently reduce access to specialty services for minorities, the disabled, and the chronically ill. Many of these individuals have lost their jobs due to physical impairments and they have lost their commercial insurance. These

individuals seek care in the accessible local sites that will lose essential revenue from their commercially insured populations. The assertion that the new facility will accept those on public health plans such as Medicare and MassHealth is not consistent with the historical patterns of practice at MGB sites, and it fails to address the fact that subsequent travel to the city of Boston for services will be nearly impossible for many of these individuals.

The assertions that MGB, the most expensive health care system in the Commonwealth, will reduce the cost of care and that it is striving to mitigate inequity and institutional racism are demonstrably farcical when considering this Westborough expansion and its site. This is not "anti-racist" as asserted by a MGB speaker at the April 6 hearing. I am sad to say that such assertions follow the pattern of the political hyperbole of certain individuals in recent years. If they tell a lie often enough it starts to sound like it may sound true.

I respectfully request that the Department of Public Health require the applicant to hold another public hearing on this application. To accurately understand the impact of this proposal, I suggest that the additional public hearing be scheduled for after an independent cost analysis has been conducted. Furthermore, 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. Ultimately, I respectfully ask that the Department of Public Health deny this application.

James. J. Ledwith Jr., MD, FAAFP

Tatnuck House Learning Community Mentor
University of Massachusetts Medical School

Physician Consultant

UMMHS Opioid Crisis Task Force

Massachusetts Consultation Service on Treatment of Addiction and Pain

Massachusetts Behavioral Health Partnership

Commonwealth Medicine, Opioid Therapeutic Class Management Work Group

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