

**From:** [Ali](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS  
**Date:** Friday, April 16, 2021 8:35:47 AM

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

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

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

Ali  
alisonkanter@gmail.com  
Newton

**From:** [Ann](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS  
**Date:** Tuesday, April 13, 2021 6:29:27 PM

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

Ann  
mulveya@gmail.com  
Canton

**From:** [Arlene](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS  
**Date:** Friday, April 16, 2021 9:22:19 AM

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

Arlene  
jgrinavic@aol.com  
West wood

**From:** [Bill](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS  
**Date:** Saturday, April 03, 2021 11:22:51 AM

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

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

Bill  
defrancw@aol.com  
Norwood

**From:** [C Richard](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** Determination of Need Program - MGB Westwood.  
**Date:** Saturday, April 10, 2021 12:33:54 PM

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I am a retired Canton Ma. resident living in the area for nearly 30 years. Prior to that time I worked full time as a nurse at the BWH - commuting 5+days a week into the city. Now that I am retired, I no longer have the stamina to drive into the city for medical appointments. It seems the older you are and the longer you do not drive into the city, the more you lose confidence to drive in a fast paced environment. I may not always be prepared to determine all of the quick driving maneuvers of those around me.

When MGB opened in Westwood, I began to change some of my medical appointments to the new site. To know I am able to merely take a 10 minute drive - on this side of 128 - is a godsend! Not to mention, parking is always available at no cost.

Please continue to increase services to this location.

Thank you,

Carol Richard  
19 Wisteria Way  
Canton, MA 02021

**From:** [Carol](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS  
**Date:** Monday, April 12, 2021 12:31:38 PM

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

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

Carol  
cabisson27@yahoo.com  
Walpole

**From:** [Caroline](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS  
**Date:** Wednesday, April 14, 2021 2:10:52 PM

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We along with entire communities of MGB patients and healthcare MGH providers (insurees) live in neighboring Norwood and the surrounding southwest Norfolk county towns. So, for sure, we are thrilled that MGB has considered offering ambulatory health care services at this Westwood site. Makes sense in terms of reducing traffic in to Boston, avoiding the escalating and prohibitive parking fees, as well as reducing s-t-r-e-s-s due to the hectic commuting/parking woes incurred while trying to make it in to Boston for appointments and outpatient procedures. A win-win for these communities!!

Caroline  
ccoletti@partners.org  
Norwood

**From:** [Charles](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS  
**Date:** Monday, April 12, 2021 4:00:18 PM

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

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

My primary care Doctor is at MGH Boston, however I use the Woburn location for blood test because of traffic and time it takes to get to Boston. I have had to travel to go to other locations for other tests as well. Having a location closer to home would be helpful as we get older. The care we receive at MGH is some of the best and access to Westwood would be greatly appreciated.

Charles  
timbercreek2@verizon.net  
Canton



**From:** [Christina](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS  
**Date:** Saturday, April 03, 2021 11:20:31 AM

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

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

Christina  
bcregan2@aol.com  
Norwood

**From:** [Christine](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS  
**Date:** Saturday, April 03, 2021 11:30:42 AM

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

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

Christine  
christinetavares@rcn.com  
Dedham

**From:** [Deborah Bell](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** Westwood Brigham expansion  
**Date:** Friday, April 16, 2021 2:25:44 PM

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I would like to see the Westwood facility to include PT, OT, etc. I would also like to see day surgery suites included.

Thank you,  
Debbie Bell

**From:** [Donna](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS  
**Date:** Saturday, April 03, 2021 11:27:13 AM

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

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

Donna  
donnaavellino@hotmail.com  
Canton

**From:** [Donna](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS  
**Date:** Saturday, April 10, 2021 2:16:41 PM

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

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

Donna  
dsabbag@verizon.net  
Dedham

**From:** [Elaine](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS  
**Date:** Friday, April 16, 2021 4:40:48 PM

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When I first heard that BWH was opening a clinic in Westwood I was pleasantly surprised. After spending years driving into Boston, fighting the traffic, paying high fees for parking, it was a relief to know that my family could get optimum health care in our own community.

The expansion of the clinic in Westwood will allow my family to continue to enjoy the convenience of high-quality care in additional health specialties. I highly recommend the expansion of the clinic.

Elaine  
HOBANE@MSN.COM  
Dedham

**From:** [Geraldine](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS  
**Date:** Saturday, April 03, 2021 11:24:50 AM

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

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

Geraldine  
angusryan@comcast.net  
West Roxbury

**From:** [Hui](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS  
**Date:** Wednesday, April 14, 2021 10:01:39 PM

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

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

Hui  
hczdfc@gmail.com  
Westwood



**From:** [Jillian](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS  
**Date:** Monday, April 12, 2021 4:01:59 PM

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As a local resident and Mass General Brigham employee, I believe and want affordable, quality healthcare that's closer to home.

Jillian  
[jferolito@partners.org](mailto:jferolito@partners.org)  
Dedham

**From:** [JoAnne](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS  
**Date:** Wednesday, April 14, 2021 3:46:34 PM

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Hello,

As a resident of Norwood, I feel that this facility would be a much needed and excellent addition to the community. Since Norwood Hospital has been closed, the local medical options are limited. I have a deep respect for the Mass General Brigham healthcare services as a local resident, patient and employee. I feel the expertise and patient care is superior as well as the compassion and services. I would be excited to have this facility in my neighborhood.

Thank you for the opportunity to share my comments.

JoAnne Meyer

Medical Services Representative

Spaulding Rehab Wellesley.

JoAnne

JMeyer6@partners.org

Wellesley Hills

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

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

Dear Ms. Szent-Gyorgyi:

Thank you for the opportunity to submit written testimony on behalf of the New England Quality Care Alliance and its providers regarding Mass General Brigham's (MGB) proposed expansion into Westwood, which is part of a broader proposal to create or expand ambulatory surgical services also in the areas of Woburn and Westborough.

The New England Quality Care Alliance (NEQCA) includes more than 1,700 affiliated physicians serving patients in numerous communities across the Commonwealth that would be negatively impacted by these proposed sites.

We have significant concerns regarding MGB's application to establish an outpatient center in the community we are honored to serve with high-quality and high-value care. We believe that these proposed projects could have extremely deleterious effects on community hospitals and our patients. MGB's proposal is misaligned with the Commonwealth's goals to improve our health care ecosystem.

### **Increased Cost of Care**

We are concerned the expansion of MGB ambulatory services into Westwood will increase the cost of care in our communities without increasing the quality of that care for patients. Per the [Health Policy Commission's 2019 Cost Trends Report](#), MGB had the highest unadjusted and adjusted total medical spending in 2017. At \$6,028 per member per year (PMPY), the system's total medical expenditures were 17 percent higher than the average of the provider groups shown in the report.

As the [Center for Health Information and Analysis \(CHIA\) reported recently](#), the cost of care in Massachusetts is continuing to rise and exceeded our state's cost growth benchmark in 2019. CHIA's data shows that outpatient hospital spending is a key driver of these skyrocketing costs.

In its Determination of Need (DoN) application, MGB claims that these proposed new sites will lower patient costs because surgeries currently performed in its inpatient settings will shift to an ambulatory environment. Although procedures performed in MGB outpatient settings are less costly than those performed in inpatient settings within its own system, they are [significantly more expensive](#) than surgeries performed in existing community provider ambulatory settings. The [Health Policy Commission has also cautioned](#) that consumer savings are currently limited in the shift to outpatient care because lower-priced systems are losing volume to higher-priced systems like MGB.

Furthermore, MGB primary care and specialty physicians at the proposed project locations are likely to refer patients for follow-up and inpatient treatment at higher-cost Boston area hospitals and providers within the MGB system, rather than to lower-cost providers in the surrounding communities. An MGB outpatient center will further exacerbate cost increases for patients by pulling them away from appropriate, less expensive local care settings.

## **Health Equity**

While health equity is a leading concern for the Commonwealth, MGB's proposal will perpetuate and worsen health disparities across Massachusetts. Each of the proposed MGB outpatient sites are located in relatively well-off, predominantly white communities.

In response to how its outpatient centers would address economic, social and/or environmental disadvantages in its proposed project communities, MGB simply states in its application that "the Proposed Project will increase access to the Clinical Services for all of the Applicant's patients." This response is inadequate, especially when paired with the fact that only 12.3 percent of MGB's statewide payor mix is Medicaid, as compared to 19.1 percent at Wellforce. MGB's claim warrants a request for further explanation and examination.

MGB's selection of affluent locations for its outpatient centers will result in greater disparities in payor mix should these projects come to fruition. The outpatient centers will target commercially-insured patients, drawing them away from community providers. This will diminish a critical source of revenue for local health systems that rely on a balanced payor mix to maintain operations and deliver quality care to MassHealth patients, people living in poverty, and patients affected by health inequities. As a result, MGB's outpatient centers could threaten to put providers who prioritize caring for MassHealth patients out of business. MGB's expansion stands to only further perpetuate the need for more services for underserved communities, rather than truly increase access to medical services for vulnerable populations.

## **Threat to Local Jobs and Community Hospitals**

There are concerns that MGB has not conducted an adequate, robust review of the physician market across service areas to determine the number of physicians needed in the market generally, as well as to identify specific community access needs when it comes to both primary care and subspecialist physicians. We are particularly keen on seeing more information on demand in the context of the Westwood market. In our experience, when a PCP migrates from one system to another in the same market, the home system typically retains a maximum of 40 percent of the patients. In some cases that percentage is much less.

Despite MGB's statements that they are shifting care from MGH and other locations to Westborough, Westwood and Woburn, their application asserts they are hiring a full spectrum of providers to fill required roles at new ambulatory facilities. This again raises concerns about duplication of care. MGB makes no mention of decreasing square footage at MGH given the supposed shift of existing care – in fact, they are seeking DPH's approval of a \$1.9 billion patient room tower in downtown Boston.

## **Antitrust and Consumer Protection**

The proposal's threat to community healthcare providers underscores concerns that MGB's expansion would bolster its market predominance, further testing the limits of anti-trust and consumer protection laws.

MGB is already the most profitable healthcare system in the Commonwealth by far, with \$2.7 billion in revenue and a positive 2.7 percent total margin. The system captures nearly 40 percent of the total net patient service revenue reported by all physician organizations in Massachusetts.

The need for new health care services in Westwood is finite. Rather than addressing actual need, these expansion proposals will increase the size of MGB's patient panel and its ability to increase referrals within its own expensive system. Our local providers, employers and community members will end up paying the price.

## **Conclusion and Next Steps**

In its [2019 Cost Trends Report](#), the Health Policy Commission advises the Commonwealth to “examine provider plans for outpatient service expansions and critically consider how new projects are likely to impact cost, quality, access, and competition in the provider market.”

In accordance with this guidance, we respectfully ask the DPH to hold another public hearing about MGB's proposed ambulatory expansion after the completion of the independent cost analysis. We would also request that the Health Policy Commission conduct this analysis to ensure this very significant expansion receives an extensive and thorough evaluation.

Thank you for your consideration, and I am happy to discuss any questions with you in the months ahead.

Sincerely,

A handwritten signature in black ink on a light blue background. The signature reads "Joseph P. Frolkis MD, PhD".

Joe Frolkis, MD PHD  
President and CEO  
New England Quality Care Alliance

**From:** [Judith](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS  
**Date:** Friday, April 16, 2021 4:35:44 PM

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

I changed my primary care doctor to one at the doctors that recently moved to Brigham and Women's Westwood Health Care Center (Dr. Julie Kaufman) and am thrilled to have such a good doctor nearby. It will be even better to have a full suite of medical care at the same location.

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

Sincerely,  
Judith L House

Judith  
judy.house@comcast.net  
Dedham

**From:** [Karen DiMartino](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** Support for MGB Project in Westwood  
**Date:** Monday, April 12, 2021 8:47:02 AM

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I would like to voice my support for the MGB comprehensive site for community care in Westwood.

At MGB health is a top priority, and I support this project in Westwood that will bring exceptional care closer to my home.

Thank you for your consideration,

Karen A. DiMartino



**From:** [Kelley](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS  
**Date:** Wednesday, April 14, 2021 10:05:22 PM

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

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

Kelley  
kellbur7@aol.com  
Norwood

**From:** [Kellie](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS  
**Date:** Tuesday, April 13, 2021 6:45:51 PM

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

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

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

Kellie  
kgay2@harvard.mgh.edu  
West Roxbury

**From:** [Kevin](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS  
**Date:** Monday, April 12, 2021 4:12:54 PM

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

I write to offer my strong support for the proposed expansion of services at Mass General Brigham's Westwood location.

As both a patient who receives my care in Westwood and an employee of Mass General Brigham, this project is especially important to me and my family. The Westwood outpatient center already provides us with a convenient alternative to driving into Boston for routine care, including doctor's visits, lab tests and imaging. The additional services that have been proposed for the site, including expanded access to specialty care, MRI/CT and day surgery, will greatly enhance the center's ability to serve as a one-stop-shop for our health care needs. Moreover, the care we receive in Westwood will cost less than comparable care provided in hospital-based settings.

While there may be other health care providers in the region, my family and I CHOOSE Mass General Brigham for our care. Having access to an integrated health care system, including exceptional providers in the community, as well as two of the best academic medical centers in the nation, gives us tremendous peace of mind that we'll be in good hands no matter our medical needs.

The proposed expansion of the Westwood location is a no brainer for us: high quality care, provided closer to our home, in a state-of-the art facility and at lower costs. But, it is a head-scratcher as to why providers in competing systems would oppose this project, and seek to deny me and the 80 some-odd thousand other Mass General Brigham patients who live within the Westwood service area access to all of these benefits.


It is my hope that the application is ultimately approved. Thank you for your consideration.

Sincerely,  
Kevin Sanginario

Kevin  
kevin.sanginario@gmail.com  
Milton

# Signature HEALTHCARE

680 Centre Street  
Brockton, MA 02302-3395

  
www.signature-healthcare.org

**Kim Hollon, FACHE**  
President/CEO

April 12, 2021

DPH.DON@MassMa il.State. MA.US

Attn: DoN Support 67 Forest Street, Marlborough, MA 01752

RE: Public Hearing concerning Massachusetts General Brigham, Inc.

Thank you for the opportunity to comment regarding Mass General Brigham's proposed ambulatory surgery expansion plans. As the CEO of Signature Healthcare, I understand well the challenges of managing a safety net health system and providing access to care in an economically challenged community. The proposed facilities will not likely have any impact on Brockton or the south shore area, but I perceive this as one of several shifts in strategy by MGB, as well as other outpatient providers that will likely impact Massachusetts for many years. I urge careful consideration of the long-term impact of these changes before the projects are approved setting a precedent for MGB and for their competitors.

I worked in Dallas, Texas for 21 years at two different safety net hospitals and experienced the steady change in market dynamics from wealthy hospitals expanding their footprints, market presence, and insurance clout through outpatient expansion. I believe Massachusetts is probably ten years behind Texas in experiencing those shifts. The initial market changes began with ambulatory surgery and outpatient radiology centers and they had a negative impact on community safety net hospitals. These two outpatient service changes provide significant contribution to operating margins and sustain acute care safety net hospitals. Commercial insurers have long been consistently underpaying for inpatient care for medical patients, but they allowed hospitals to recoup their losses through the growth in outpatient services. In many cases the outpatients cared for in hospitals are diagnosed and treated in space required for their inpatients, and the outpatients cared for in this space therefore represent marginal volume. These outpatients, treated within the inpatient fixed cost environments often provide the slim margins that sustain safety net hospitals. With a high fixed cost infrastructure, safety net facilities are not able to reduce cost at the same rate that they lose revenue when outpatient volume is siphoned off to free standing facilities.

In Dallas after initially opening free-standing ambulatory surgery and radiology centers, there were more operating rooms than the community needed so facilities sought to expand their revenue by providing the opportunity for surgeons to invest in the facilities. Within just a few years, the large systems in Dallas and Ft. Worth began to build new joint ventured surgery centers off their campuses and nearby their competitors, attracting patients by joint venturing with surgeons that were on the staff of their competitors. This strategy allowed the large hospitals to expand revenue without cannibalizing existing revenue. Competitors retaliated by developing similar joint ventures off of their campuses and on the campuses of their competitors. After 5 to 8 years of this expansion process a new round of expansion began with the existing surgery centers adding IO to 15 beds so that they could care for one day stay patients.

While this facilities arms race was sweeping across north Texas, surgeons began to reorient their surgical practices around outpatient surgery. When a majority of their surgical volume was being performed in outpatient surgery facilities they had investment in, they realized that they no longer needed hospital privileges and resigned from the community hospitals in large numbers. Community hospitals were forced to recruit replacement surgeons through costly physician call coverage arrangements or recruit surgical hospitalists and orthopedic hospitalists to sustain adequate access to specialists to cover their emergency departments and sick inpatients.

For safety net hospitals in Texas these changes resulted in higher prices for hospital care as hospitals were forced to negotiate higher reimbursements to cover the loss of this marginal and profitable volume. As health systems developed greater network penetration across the area, they were able to increase their leverage with insurance companies.

Massachusetts has not experienced these changes for many reasons, and the citizens have greatly benefited from the State's view to health policy planning. However, Massachusetts planning system has significant gaps when considering the long-term impact of ambulatory care expansion. Signature's ability to provide access to care and retain physicians is significantly impacted by a large physician group that years ago negotiated very high commercial reimbursement as a result of being affiliated with Partners. These physicians located their offices on the edge of Brockton near a wealthier suburb and cared for a much smaller percentage of Medicaid patients than are represented in the greater Brockton area. There are no regulations that require them to care for patients with government sponsored insurance and the State does not collect meaningful planning data regarding ambulatory physicians.

The State's healthcare planning process has not had the tools necessary to prevent the market distortion and harm to access for poor communities that has occurred from the growth of large physician groups, and I fear the state does not have adequate planning, monitoring and influence tools to control the unintended consequences of an outpatient facility spending war set off by MGB's expansion. The State has already allowed physicians to invest in surgery centers so this market dynamic is poised to mature. The change I watched unfold in Texas has already begun and the large academic facilities and for-profit providers have greater access to capital than community hospitals. Massachusetts was forced to establish additional planning controls after Partners gained power and negotiated rates that distorted the market. Since that time, the price variation has not significantly changed for those of us at the bottom, and the market distortion created a significant change in merger activity in the State. While the State continues to search for answers to resolve the price disparity problem, it is not the time to allow another big market change to occur. History has already proven that once the market is distorted, resolving the distortion is next to impossible in spite of gallant effort.

We are already seeing a decline of-2% and likely shift in outpatient care from high public payer community hospitals to academic medical centers who saw a 16% increase during the same timeframe of 2015-2019. This was detailed on slide 57 in the Health Policy Commission's March 2021 cost trends hearing presentation by David Auerbach, and should be alarming.

It is likely that the cost growth benchmark limit is driving MGB to seek revenue enhancement by growing its market share and volume to accommodate cost growth. This may be an unintended consequence, but it is nevertheless an impact on cost, and access since none of these expansions occur in communities that serve lower income populations, and shifting more commercial volume to higher cost AMC's undermines the safety net systems.

I urge the state to study carefully this substantial expansion of off campus outpatient services paying particular attention to the market changes that occurred in other states, the increased surgical volume that resulted from physician ownership, the negative impact on safety net access, and the long-term growth in insurance rates. The population in Massachusetts is not growing at a pace that warrants the additional facilities from an access perspective, providing ample time for careful study without negatively impacting access. Failure to predict the next ten years of change and establish adequate controls now will cause further erosion of safety net access.

The image shows a stylized signature in a dark blue color. The letters 'j' and 'i' are lowercase and connected, while the 't' is uppercase and stands alone. The signature is written in a clean, modern font.

<signature on file>

Kim Hollon  
President/CEO

**From:** [Linda](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS  
**Date:** Wednesday, April 14, 2021 9:43:07 PM

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

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

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

Linda  
zhongfamily428@gmail.com  
Westwood

**From:** [Marie](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS  
**Date:** Wednesday, April 14, 2021 10:09:36 AM

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

Marie  
mhenry@partners.org  
Canton

**From:** [Marie-Ange](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS  
**Date:** Saturday, April 10, 2021 2:04:40 PM

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

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

Marie-Ange  
mcasimir@partners.org  
Canton



**From:** [Martha A](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS  
**Date:** Saturday, April 03, 2021 11:21:22 AM

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

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

Martha A  
Martha\_Russell@verizon.net  
Norwood

**From:** [Mary](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS  
**Date:** Friday, April 09, 2021 2:26:11 PM

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

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

Mary  
jakewtf@verizon.net  
Dedham

**From:** [Michelle](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS  
**Date:** Saturday, April 10, 2021 2:06:42 PM

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

Michelle  
michellerstrauss@gmail.com  
Westwood

**From:** [Powers, Ashley \(SEN\)](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** DON FILE #: Mass General Brigham Incorporated – Multisite – 21012113 – Sen. Rush testimony  
**Date:** Friday, April 16, 2021 12:58:58 PM

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MASSACHUSETTS SENATE

OFFICE OF THE MAJORITY WHIP

SENATOR MICHAEL F. RUSU  
MAJORITY WHIP  
Norfolk and Suffolk District

Michael.F.Rustt@MASENATE.GOV  
WWW.MA.SENATE.GOV

Chair  
JOINT COMMITTEE ON  
MENTAL AFFAIRS

STATE HOUSE, ROOM 109C  
BOSTON, MA 02133-1053

FAX: (617) 722-1001

April 15, 2021

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

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

Dear Ms. Gyorgyi:

As a State Senator representing the town of Westwood, I am writing to offer my strong support for the proposed expansion of services at Mass General Brigham's existing location in Westwood.

Since the outpatient facility first opened in 2018, it has been an anchor for the mixed-use development known as University Station and has provided many of my constituents with a convenient alternative to driving into downtown Boston for doctor's visits and other routine care. The additional services that have been proposed for the site, including expanded access to behavioral health and specialty care, enhanced imaging, and ambulatory surgery will greatly benefit the 80,000 patients of Mass General Brigham who live in Westwood and the surrounding communities - allowing them to meet even more of their health care needs closer to home, in an integrated and lower-cost setting.

In addition to the many clinical benefits the project will offer, it will also have a significant economic impact, creating approximately 300 construction jobs and 150 permanent jobs once complete. Importantly, the project will also generate roughly \$2M in Community Health Initiative Funding to help address public health needs within the community.

In closing, I would just like to reiterate my support for the project, and respectfully request your favorable review of Mass General Brigham's Determination of Need application. Thank you for your consideration. Please do not hesitate to call upon me if you have any further questions.

Sincerely,

<signature on file.

Mike Rush

State Senator  
Norfolk and Suffolk District

**From:** [Myrna](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS  
**Date:** Saturday, April 03, 2021 11:24:18 AM

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

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

Myrna  
myrnale@comcast.net  
Westwood

**From:** [Olya](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS  
**Date:** Saturday, April 03, 2021 11:30:15 AM

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

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

Olya  
Olyajmaj@msn.com  
Norwood

**From:** [Paul](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS  
**Date:** Saturday, April 10, 2021 2:17:36 PM

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

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

Paul  
paulcnewton@icloud.com  
Canton



April 8, 2021

Received April 13, 2021  
Determination of Need  
Massachusetts Department of Public Health  
67 Forest Street  
Marlboro, MA 01752

Dear Sir/Madam,

On April 1, 2021 I listened to the Public Hearing on the plan to expand the Mass General Brigham facility in Westwood.

As an existing patient, I **fully** support this expansion. My voice joins many others endorsing this project. It will be much more convenient to have all of my health care needs provided at a single site rather than have to go to Boston. Currently, I have office visits at one facility, certain tests at another facility, MRI's at the main hospital, etc. This takes more time and there is the added cost for parking at several of the facilities.

It appeared that the only dissenting voices heard during the April 1<sup>st</sup> public hearing were from a former and current employee of Shields MRI and one other independent imaging provider with their primary reason being the expanded facility would create competition.

I strongly recommend that the Department of Public Health allow this project to move forward and offer much needed comprehensive local healthcare.

Sincerely,

<signature on file>

Peter M Molina

41 Wycliff Ave  
West Roxbury, MA 02132

**From:** [Reema](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS  
**Date:** Tuesday, April 13, 2021 5:13:21 PM

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

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

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

Reema  
reemakdu@aol.com  
Needham

**From:** [Rita F. Muir](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** Mass General Brigham Westwood Expansion  
**Date:** Friday, April 09, 2021 8:54:03 AM  
**Importance:** High

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DATE: April 9, 2021

TO: Massachusetts Department of Public Health

Re: Determination of Need – Westwood Expansion

On April 1<sup>st</sup>, I listened intently to the public hearing on the proposed expansion of the Mass General Brigham healthcare center in Westwood.

I endorse this project wholeheartedly and strongly believe that it will provide much needed, comprehensive local healthcare at an easily accessible site. I am currently a patient and would definitely benefit from having all of my healthcare needs provided at a single site including office visits, labs/scans/imaging and outpatient procedures. In addition, there is free parking. Prior to the pandemic, I would spend approximately \$100.00 in parking per year.

If my notes are accurate, 41 of the many listeners offered comments. There were 11 dissenting comments from employees of Shields (current & former) and another imaging provider. Their main reason for not support the expansion is the fact that it would negatively impact their businesses (creating competition) as imaging would now be offered at the expanded site in Westwood. I believe there were 2 other dissenting comment from NFP, an large insurance broker, and the New England Health Care Alliance.

Most of the others comments **strongly supported** the expansion including patients, Life Works, Council on Aging, residents and town representatives from Norwood and Westwood, the carpenter's union, and existing medical providers in the Mass General Brigham network.

I hope that the Department of Public Health will allow this project to move forward as quickly as possible so that high quality, comprehensive healthcare can be offered at the expanded local site in Westwood.

Thanking you, in advance, for your thoughtful consideration.

Sincerely,

Rita F. Muir

60 Sanborn Ave  
West Roxbury, MA 02132

**From:** [rodilyn](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS  
**Date:** Tuesday, April 06, 2021 8:45:24 AM

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

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

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

rodilyn  
rglushchenko@partners.org  
norwood

**From:** [Ronnie](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS  
**Date:** Wednesday, April 14, 2021 9:47:52 PM

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

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

Ronnie  
rongrteng@gmail.com  
Westwood

**From:** [Ruth](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS  
**Date:** Monday, April 12, 2021 10:10:53 AM

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

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

Ruth  
roru1930@msn.com  
Westwood

**From:** [Sheelu](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS  
**Date:** Tuesday, April 06, 2021 8:39:44 AM

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As a Westwood resident and Mass General Brigham employee, I fully support proposed health care expansion in Westwood. I believe this would greatly help Westwood residents for easy access to better health care services at a lower cost.

MGB's is committed for patients, their communities, care team members, and employees.

Sheelu  
giri.sheelu@gmail.com  
Westwood

RECEIVED

APR 15 2021

MA Dept. of Public Health  
67 Forest St.  
Marlborough, MA 01752

April 2, 2021

I writing a brief summary of ideas that would benefit the new expand facility in the Westwood area. There are other areas to explore later.

As a partially blind person from birth; a fully visual dept. would be helpful to all from glaucoma - Cataract etc. (day surgery)

\* Eye + ear, nose dept is always a busy dept of need!

An interest in Health + Nutrition; Nutrition value for each age group is different and not taught such as infant to child - teenagers to adulthood and midlife age to senior. They all effect weight control. Not easy to lose weight!

\* A nutrition + health dept, newsletter or classes on waste money spend on food shopping. Need healthy grocery list for better nutrition. Too many manufactured - non-healthy food on grocery shelves.



\* Physical Therapy does ease pain  
- from arthritis. Diseases benefit  
and preventive by good nutrition  
and health

\* Exercise is Medicine \*

Lastly -

Please have more road signs  
to indicate the new facility  
as it is set-back off the main  
road. My ~~first~~ first visit  
was a little confuse of  
its location.

Yours,

Sonia Varquez

I hope this note is helpful.

Received April 15, 2021  
Massachusetts Department of Public Health  
67 Forest Street  
Marlborough, MA 01752

April 2, 2021

I [am] writing a brief summary of ideas that would benefit the new expand[ed] facility in the Westwood area. Their [There] are others area[s] to explore later.

As a partially blind person from birth, a fully visual dept. [department] would be helpful to all from Gla[u]coma-Cataract etc. (day surgery)

\*Eye +[and] ear, nose dept.[department] is always a busy dept [department] of need! An interest in Health & Nutrition; Nutrition value for each age group is different and not taught such as infant to child-teachings to adulthood and midlife age to senior. They all effect weight control. Not easy to lose weight!

\*A nutrition +[and] health dept [department], newsletter or classes on wasted money spend [spent] on food shopping. Need [a] healthy grocery list for better nutrition. Too many manufactured-non-healthy food on grocery shelves.

\*Physical Therapy does ease pain from arthritis. Diseases benefit and preventive by good nutrition and health.

\*Exercise is Medicine\*

Lastly-

Please have more road signs to indicate the new facility as it is set-back off the main road. My ~~first~~ first visit was a little confuse[ing] of its location.

Yours,

Sonia Vazquez

I hope this note is helpful.

**From:** [Steven](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS  
**Date:** Monday, April 12, 2021 4:00:26 PM

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The project will also provide much needed jobs, including 300 union construction jobs and 200 permanent jobs, that will help our local economy emerge from the pandemic. I do use the Foxboro facility too but the next closest is the Faulkner.

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

Steven  
steve\_toni@norwoodlight.com  
Norwood

**From:** [Steven](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS  
**Date:** Saturday, April 10, 2021 2:12:09 PM

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

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

Steven  
steve\_toni@norwoodlight.com  
Norwood

**From:** [Dempsey, Susan M.](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** Mass General Brigham Westwood facility  
**Date:** Monday, April 05, 2021 1:54:07 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.

My name is Susan Dempsey. Thank you for offering members of the community the opportunity to share our perspectives. I am a resident of Westwood. My family uses the existing Mass General Brigham Westwood facility and loves the convenience of the location and the MGB quality of care. I know they would readily take advantage of this proposed facility to receive a broader range of care at a lower cost and greater convenience than at a hospital.

I also assist our 88 year old aunt with her healthcare needs. She lives in Canton and insists on receiving Mass General Brigham care. As I am sure many of you have experienced, trying to navigate large, bustling facilities with an elder is very challenging and stressful for them. My Aunt Kathy was thrilled to see the Mass General Brigham logo on the Westwood facility just a 5 minute drive from her house. It makes her feel secure and lessens her anxiety tremendously. We have had a fabulous experience with her primary healthcare in Westwood and would be grateful if she could receive even more types of strictly ambulatory MGB care in this patient friendly setting.

Finally, I am a 30 year employee of Brigham & Women's and Brigham & Women's Faulkner Hospitals. Over the years, I have been fortunate to participate in building programs that bring care out of the large hospitals to our patients in their community. It is my experience that this is what our patients want and need. I believe in this strategy and fully support the advancement of this project. Thank you for your time and attention.

Susan Dempsey

**From:** [Suzanne](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS  
**Date:** Wednesday, April 14, 2021 2:03:02 PM

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

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

The closer to home we can provide needed healthcare services, the better care we provide our patients! I believe it is important to offer local access for patient who live in the South Eastern MA. area. These include required imaging and lab services, Covid Testing & vaccination, Physical Therapy and both Pulmonary Function Tests and Cardio Stress Echo Testing. Many loyal patients travel long distances from their homes to obtain these required tests at the main hospital when they would be better served closer to their homes.

Thank you for your consideration.

All the best,  
Suzanne Heffernan

Suzanne  
Suzlarryh@gmail.com  
Needham

**From:** [Theresa](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS  
**Date:** Friday, April 16, 2021 2:06:09 PM

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

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

Theresa  
tap0802@hotmail.com  
Canton

**From:** [Victor](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS  
**Date:** Saturday, April 10, 2021 2:03:13 PM

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

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

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

Victor  
vhg\_truck16@yahoo.com  
Hyde Park



**From:** [William](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS  
**Date:** Monday, April 12, 2021 3:49:57 PM

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As a local resident, I support Mass General Brigham's project to provide the same healthcare I receive today in Boston closer to my home. We need more access to care in our community – especially behavioral health, which this site will provide. As you know behavioral health is an important aspect of health care, often more difficult to obtain. Having more local, high quality services available is important to our community.

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

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

William  
billkath4546@gmail.com  
Walpole

**From:** [Ying](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS  
**Date:** Friday, April 16, 2021 9:46:51 AM

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

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

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

Ying  
yz124@hotmail.com  
Westwood

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

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Please see below on behalf of Pondville Medical Associates

Dear Ms. Szent-Gyorgyi:

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

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

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

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

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

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

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

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

Sincerely,

 Riad Mortada, MD

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

[REDACTED]  
Fax: 508-623-3701



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