

From: jessi611@aol.com
To: [DPH-DL - DoN Program](#)
Cc: victoriasmailbox@gmail.com
Subject: Woburn MGH
Date: Thursday, April 15, 2021 5:30:19 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.

To whom it may concern,

There is a great need for MGH medical services in the Woburn area. A dire need for the services of primary care physicians. This site will do well and the people of Woburn look forward to its opening.

Thank you,
Jessica Iannacci

Good morning, I appreciate the opportunity to be here today. My name is Gail Infurna and I am here to speak against the Mass General Brigham expansion.

By way of background, I have spent my career in nursing. I also served on the Melrose Board of Aldermen for over twenty years, and was the Mayor of the City of Melrose. I am now a proud member of the Board of Trustees for Melrose Wakefield Healthcare.

Throughout my careers in both nursing and government, my job was to listen carefully to people and tend to their needs. Over my many years of experience, this has taught me that people, in terms of their health care, want three things: the highest standard of care, access to care close to where they live, and care provided at a reasonable cost. These three priorities make up the Melrose Wakefield Healthcare and Wellforce mission. Melrose Wakefield Healthcare has been working hard to provide excellent care to those who might have otherwise gone to Boston hospitals. This has all been done at a cost that is 45% lower than Boston hospital rates.

My experience in local government has taught me that when dealing with development issues that the public wants their voices heard. It's important to have multiple public hearings and to conduct an independent cost analysis peer review.

The proposed Mass General Brigham expansion site for Woburn, would be within mere miles of three existing community hospitals: it would be 2 miles from Winchester Hospital, 3 and ½ miles from MelroseWakefield Hospital, and 5 miles away from Lawrence Memorial Hospital in Medford, which has a recently-opened low-cost ambulatory surgery center. The proposed site is also located less than one mile away from many local community ancillary health providers.

I am extremely concerned that the proposed Mass General Brigham facility will shift patients away from community healthcare and into high priced expansion. We know that the payor mix between Mass General Brigham and Melrose Wakefield Healthcare is quite different. It is not surprising that in choosing to build a \$73 million complex in Woburn, Mass General Brigham has picked an ambulatory location that is highly affluent, which will result in greater disparity to the payor mix if this project is allowed.

There have been discussions at length about issues of equity, especially in public health, throughout this pandemic. Let's not widen the gap by creating high priced healthcare for those who can afford it, at the expense of community-based, affordable, health care settings. As we recover from this pandemic, it is more important than ever to keep healthcare affordable and accessible in our local communities. Thank you for your time and consideration.

From: [Garrett](#)
To: [DPH-DL - DoN Program](#)
Subject: DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS
Date: Friday, April 16, 2021 4:36:59 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.

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.

Garrett
gjmckinnon@aol.com
arlington

From: [Garrett Melick](#)
To: [DPH-DL - DoN Program](#)
Subject: Vail/MGB Project
Date: Wednesday, April 14, 2021 5:44:49 PM

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Dear Madams and Sirs,

I am writing as an outpatient surgeon credentialed at Winchester Hospital and Surgery Center to voice my strong opposition against the Mass General Brigham outpatient center proposed for Woburn, MA for several reasons:

- This outpatient center will increase healthcare costs in the Commonwealth given Mass General Brigham's higher reimbursements, despite other sources of care already established in the community.
- This outpatient center would duplicate other outpatient services including PCP's, specialist physicians, ambulatory surgery, advanced imaging modalities, etc. This would pose a significant threat to Winchester Hospital, Melrose-Wakefield Hospital, and local community physicians. As a new specialist provider in foot and ankle surgery, I feel very strongly about this subject.

Please STOP this project to prevent escalation of healthcare costs and to maintain the high value affordable care for patients and employers of this region.

Thank you,

Garrett Melick, DPM
Reading Foot & Ankle Specialists

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From: [GLORIA KORTA](#)
To: [DPH-DL - DoN Program](#)
Cc: William.Breckwoldt@lahey.org; [Rick Weiner](#); retirmd@gmail.com
Subject: Pending DON Application
Date: Sunday, April 11, 2021 5:43:59 PM

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7 Wainwright Rd, Unit 12
Winchester, MA 01890
Determination of Need Program
Department of Public Health
Commonwealth of Massachusetts

To whom it may concern:

I am a resident of Winchester and a member of the medical staff of Winchester Hospital since 1989. I am writing to state my strong **opposition** against the Mass General Brigham Outpatient Center proposed for Woburn, MA.

This proposed outpatient center will only the duplicate the medical services already available in close proximity to this site. There is adequate access to primary care and specialist physicians as well as ambulatory surgery and lab and imaging services.

This new site could represent a risk to the viability of physician practices and our community hospitals, Winchester Hospital and Melrose-Wakefield Hospital. These physicians and hospitals provide exceptional care at a lower cost and therefore greater value than what is available from Mass General Brigham. A new site could disrupt the relationships that our patients have with the providers and community hospitals that are here and have adequate capacity to care for them.

I urge you to DENY the application for this project and prevent the disruption of healthcare in our community and the escalation of healthcare costs.

Sincerely,
Gloria Korta, MD

From: [GLORIA](#)
To: [DPH-DL - DoN Program](#)
Subject: DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS
Date: Friday, April 09, 2021 2:27:37 PM

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

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

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

GLORIA
GLORIIAE@YAHOO.COM
Woburn

From: [Gregory Weisz](#)
To: [DPH-DL - DoN Program](#)
Subject: Mass General Brigham outpatient center proposed for Woburn, MA
Date: Wednesday, April 14, 2021 12:22:21 PM

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Department of Public Health

Determination of Need Program

April 14, 2021

Dear People:

The Winchester Hospital Emergency Department is the primary source of emergency care for the people of Winchester, Woburn, Stoneham and parts of several other surrounding communities. We average 40,000-50,000 emergency visits per year which includes 20-25 ambulance arrivals per day. We admit 25% of our patients to the hospital and we consistently score above the 95%ile in our patient satisfaction surveys.

Our ability to provide this level of emergency care depends upon the superb medical community of Winchester Hospital. This community includes the gem that is Winchester Hospital as well as our excellent primary care providers and specialists in surgery, radiology, orthopedics, obstetrics, cardiology, pediatrics, ophthalmology, otolaryngology, gastroenterology, pathology and many others. Winchester Hospital is dedicated solely to the care of its patients, and because of this, our Emergency Department is able to provide a world class level of emergency care.

Massachusetts General Brigham, Inc.'s plan to build a multimillion dollar surgical and imaging facility 2 miles from Winchester Hospital was developed when the MGH and Brigham leaders seemed squarely focused on increasing market share and revenue. It appears designed to draw business away from Winchester Hospital and other community hospitals and in so doing threatens to cripple them.

The people in our community do not need a massive medical office building with surgical and imaging facilities 5 minutes away from similar facilities that already meet those needs. They do need access to expert emergency care. They have had it for decades, because providing this care has been and continues to be our mission. We cannot accomplish this mission without a strong, viable Hospital behind us.

Gregory J. Weisz, MD, Chairman

Winchester Hospital Emergency Department

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From: [Gretchen](#)
To: [DPH-DL - DoN Program](#)
Subject: DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS
Date: Tuesday, April 13, 2021 10:26:26 PM

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

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

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

Gretchen
gmgarlow@yahoo.com
Lynnfield

From: [Haldon Bryer](#)
To: [DPH-DL - DoN Program](#)
Subject: Proposed MGH Brigham Outpatient Center at the Vale in Woburn, MA
Date: Thursday, April 08, 2021 5:01:12 PM

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Dear Madams and Sirs:

I am writing as a long-time physician (Radiologist) at Winchester Hospital, to voice my strong **opposition against** the Mass General Brigham outpatient center proposed for Woburn, MA for several reasons:

- This outpatient center will increase healthcare costs in the Commonwealth as Mass General Brigham has much higher reimbursements than other health care systems, even when care is provided in the community.
- Given the availability of primary care physicians, specialty care physicians, ambulatory surgery, CT scans, MRIs, and other community hospital services currently available in the Woburn area, this proposed outpatient center includes duplicative services and presents an unnecessary threat to the local physician practices and community hospitals, including Winchester Hospital and Melrose-Wakefield Healthcare.
- This outpatient center will endanger our private medical practices, where primary care physicians and specialists are offering exceptional care at lower costs. Our local physicians include some of the highest reputation physicians in the region, providing high quality care at a much lower cost, as compared to Mass General Brigham providers.
- Approval of this outpatient center would threaten the ability of existing high value providers (high quality and low cost) to continue to serve the residents of Woburn and surrounding cities and towns.

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

Sincerely,

Haldon Bryer, MD
Radiologist


Haldon.Bryer@Lahey.org



Winchester Hospital
winchesterhospital.org

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From: [Hany Takla](#)
To: [DPH-DL - DoN Program](#)
Date: Thursday, April 08, 2021 9:31:30 PM

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Dear Madams and Sirs:

I am writing as a Boston resident (or employee of Winchester Physician associates) to voice my strong **opposition against** the Mass General Brigham outpatient center proposed for Woburn, MA for several reasons:

- This outpatient center will increase healthcare costs in the Commonwealth as Mass General Brigham has much higher reimbursements than other health care systems, even when care is provided in the community.
- Given the availability of primary care physicians, specialty care physicians, ambulatory surgery, CT scans, MRIs, and other community hospital services currently available in the Woburn area, this proposed outpatient center includes duplicative services and presents an unnecessary threat to the local physician practices and community hospitals, including Winchester Hospital and Melrose-Wakefield Healthcare.
- This outpatient center will endanger our private medical practices, where primary care physicians and specialists are offering exceptional care at lower costs. Our local physicians include some of the highest reputation physicians in the region, providing high quality care at a much lower cost, as compared to Mass General Brigham providers.
- Approval of this outpatient center would threaten the ability of existing high value providers (high quality and low cost) to continue to serve the residents of Woburn and surrounding cities and towns.

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

Sincerely,

Hany Takla, MD, FACS, FASMBS
General & Bariatric Surgeon
Medical Director of robotic surgery
[REDACTED] | F: 781-729-6846



Winchester Hospital
WinchesterHospital.org

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From: [Heather](#)
To: [DPH-DL - DoN Program](#)
Subject: DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS
Date: Tuesday, April 06, 2021 8:31:38 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. Many of my current and former patients found the distance and parking expense at the main campus to be barriers to accessing weekly psychiatric services when necessary, but they made the trip in order to integrate their psychiatric care with the rest of their medical care. By seeing a psychiatric provider at MGH, these patients enabled me as their therapist to have easy access and open communication with their other MGH providers--essential when treating the whole person. To have an MGH center of care for those North and West of Boston would improve access, and improve integrated care.

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 Woburn and the surrounding communities to ensure that Mass General Brigham that uses our people, research, and technology to meet the needs of our patients.

Heather
heatherbo@gmail.com
Arlington

From: [Jeni Son](#)
To: [DPH-DL - DoN Program](#)
Subject: MGB Woburn - Determination of Need Comments
Date: Friday, April 16, 2021 3:52:52 PM
Attachments: [image.png](#)

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Hello,


I am writing to voice my strong opposition against the Mass General Brigham outpatient center proposed for Woburn, MA for the following reasons that I attest to below.

- The outpatient center will increase healthcare costs in the Commonwealth, as our data suggests that the cost per capita of patients who access Mass General Brigham services spend at least 30% more than care that is offered in our community.
- CHIA released their Annual Report last month, indicating a 4.1% increase in health care costs across Massachusetts in 2019. The primary driver of the increased trend was reported to be outpatient care costs. Allowing MGB to add an outpatient patient center, would add to the risk of increased healthcare costs in our state.
- Within a 5 mile radius of Winchester and Woburn, we are saturated with highly skilled healthcare providers of service. Patient needs are currently being met by these services today and for those unable to be met by local providers, it is a great advantage to be able to offer care to our patients to MGB if patients require such an advanced level of care. The multispecialty facility duplicates the local services, and MGB's network retention of patients becomes an immediate threat to the local physician practices and community hospitals, while driving up the overall cost of healthcare.
- It impedes the opportunities for growth and investment into the local community hospitals that have a proven record of providing higher quality at significantly lower costs. The disparity that this will create within the workforce will not allow for us to invest capital and human resources back into our local health care systems and practices. Community hospitals and private practices must be able to fairly compete in the healthcare market.

Thank you for your careful and serious consideration.

Huisook Jeni Son, Director
[Winchester Physician-Hospital Organization](#)

1021 Main Street, Suite 203
Winchester, MA 01890


Fax: 781-756-7274

huisook.son@lahey.org

Winchester PHO Main Line: 
www.winchesterpho.org

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From: [Jaci](#)
To: [DPH-DL - DoN Program](#)
Subject: DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS
Date: Tuesday, April 13, 2021 10:08:50 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.

Jaci
jaxavier@mgh.harvard.edu
Winchester

From: [JACQUELINE COOGAN](#)
To: [DPH-DL - DoN Program](#)
Cc: [Jackie Coogan](#)
Subject: Testimony - Mass General Brigham Incorporated – Multisite - 21012113-AS
Date: Thursday, April 15, 2021 5:19:39 AM
Importance: High

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Good Morning,

I hope this letter finds all of you healthy and safe.

As a resident of Melrose for almost 4 decades and a patient at the Melrose Wakefield Healthcare system for exactly the same time, almost 40 years, I have recently become aware of a new Ambulatory Surgical Center being built in Woburn by Mass General Brigham(MGB).

This alarms me, as this proposed Woburn site would have a massive negative impact on the cost of care and ability for local community healthcare organizations to continue to support our residents. There are already the Shields/Melrose Wakefield Surgical Center, which has just opened on the campus of Lawrence Memorial Hospital and another hospital-licensed Center in Winchester through Winchester Hospital.

In addition, my alarm in particular is heightened for the following four reasons:

1. **Cost of care**

- Due to the economic impact of the pandemic, many Massachusetts families and individuals are just barely making ends meet. Any increases to the **cost of care** are unacceptable, untenable and puts them further at risk and even more vulnerable.

2. **Protecting local care**

- I believe that the expansion of Mass General Brigham (MGB) ambulatory services into Woburn will threaten essential local jobs and the financial viability of critical community care institutions.
- **Local care is important and quality care is local!**

3. **Health equity**

- I believe that the expansion of Mass General Brigham (MGB) ambulatory services into Woburn is likely to worsen existing health disparities.
- The locations are not easily accessible to residents of low-income communities with barriers to health care, leaving access and the needs of many residents behind.
- Our local providers will continue to serve those patients even if their commercial volume is negatively impacted by MGB. However, these same providers may be financially forced to close much needed medical services, resulting in reduced safety net care for our communities' most vulnerable patients.

4. **Determination of need process**

The Determination of Need process was established to protect community hospitals from the development of ambulatory surgical centers nearby without the community hospital's consent or participation. DPH is still developing these guidelines and to move forward with the review of this proposal without those protective guidelines in place would set a dangerous precedent.

I ask that you seriously revisit the development of this new Ambulatory Surgical Center being built in Woburn by Mass General Brigham(MGB). As I see it and understand the process, it would certainly be detrimental to our local health systems in place, the people who serve our patients and residents but most importantly puts in jeopardy our most needy and vulnerable children, seniors and families.

I submit my testimony in opposition to this Surgical Center being built at this Woburn site. I look forward to hearing from you.

Respectfully submitted,
Mrs. Jacqueline M Coogan

jmincoogan@comcast.net



From: [Janet](#)
To: [DPH-DL - DoN Program](#)
Subject: DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS
Date: Friday, April 16, 2021 4:33:13 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.

Janet
jdavis2154@gmail.com
Wilmington

From: [Janet Gallant-Wood](#)
To: [DPH-DL - DoN Program](#)
Subject: MGH/Vale Proposal
Date: Friday, April 16, 2021 3:08:48 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.

Dear Madams and Sirs:

I am writing as an employee of Winchester Hospital where I have a collaborative oncology practice as a Nurse Practitioner. I am writing to voice my strong **opposition against** the Mass General Brigham outpatient center proposed for Woburn, MA for several reasons:

- This outpatient center will increase healthcare costs in the Commonwealth as Mass General Brigham has much higher reimbursements than other health care systems, even when care is provided in the community.
- Given the availability of primary care physicians, specialty care physicians, outpatient cancer and infusion center, ambulatory surgery, CT scans, MRIs, and other community hospital services currently available in the Woburn area, this proposed outpatient center includes duplicative services and presents an unnecessary threat to the local physician practices and community hospitals, including Winchester Hospital and Melrose-Wakefield Healthcare.
- This outpatient center will endanger our private medical practices, where primary care physicians and specialists are offering exceptional care at lower costs. Our local physicians include some of the highest reputation physicians in the region, providing high quality care at a much lower cost, as compared to Mass General Brigham providers.
- Approval of this outpatient center will threaten the ability of existing high value providers (high quality and low cost) to continue to serve the residents of Woburn and surrounding cities and towns.

My former practice (for 26 years) was as an oncology Nurse Practitioner at MGH Cancer Center. For the past 13 years, I have been in practice in Winchester after accepting the opportunity to be part of a collaborative team to build the outpatient Center for Cancer Care at 620 Washington Street – completed in 2011. The care we provide at the Cancer Center here is of the highest quality and keeps the majority of oncology care in our community. Building additional oncology outpatient services nearby would be duplicative. MGH has outpatient centers for Cancer Care in Danvers and in Boston (15 miles and 6 miles respectively from Woburn), as well as MGH West in Waltham (10 miles away) BWH has Cancer Care in Lowell and at Emerson Concord (18 and 20 miles away) There are more than enough urban and suburban sites to support their patients' medical, surgical and oncological needs.

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

Sincerely,

Janet Gallant Wood MSN, ANP-BC

Nurse Practitioner

Gynecologic Oncology



| F: 781-838-6061



Winchester Hospital

WinchesterHospital.org

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From: [Jeanne](#)
To: [DPH-DL - DoN Program](#)
Subject: DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS
Date: Sunday, April 11, 2021 9:56:46 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.

Jeanne
jelliott1@partners.org
Wilmington

From: [Jeffrey Brown](#)
To: [DPH-DL - DoN Program](#)
Subject: Comment on the Vale MGB Project in Woburn
Date: Sunday, March 28, 2021 3:10:46 PM

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

I am an ENT physician in private practice. Our practice has served the community since 1954, over 65 years. We have offices in Winchester and Woburn. We are on staff at Winchester Hospital and Melrose-Wakefield Hospital.

MBG has situated an abundance of ENT doctors employed by Massachusetts Eye and Ear infirmary in our community. Patients in our area already have the choice of high quality healthcare from Winchester Hospital, Lahey Hospital, Melrose-Wakefield Hospital and all of the Boston hospitals. The high number of competing healthcare systems in our community has limited the ability of our own practice to recruit physicians. The community hospitals that we serve have had financial struggles prior to the pandemic. With the additional costs of the pandemic, these facilities are facing challenges to their survival. The COVID-19 crisis has proven that these community hospitals are critical to serving the healthcare needs of our neighborhoods. The DPH needs to assure that these facilities will be available when the next major healthcare crisis unfolds.

There is no doubt that a large MGB outpatient facility with clinics, surgery suites and imaging facilities less than a mile from Winchester Hospital will compete for the limited number of patients being served by existing healthcare practices and clinical centers. This will contribute to further financial loss for our hospitals and our own practice and eventually to the demise of community healthcare and private practice medicine in our area. There is evidence that a behemoth healthcare system like MGB with profound marketing resources will provide more expensive healthcare with no evidence that it will improve the quality of care for patients. I urge the DPH reject the proposed MGB Vale project.

Respectfully submitted,

Jeffrey Brown, M.D.

--

[Jeffrey S Brown, MD](#)
[ENT Consultants](#)

From: [jennifer](#)
To: [DPH-DL - DoN Program](#)
Subject: DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS
Date: Tuesday, April 13, 2021 10:39:03 PM

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

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

Our response to COVID-19 is an example of how a coordinated approach can result in better access. I support this project, and I am looking forward to working with Woburn 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
jenniferlucasyoung@gmail.com
Woburn

To the DoN Committee:

My name is Jennifer Manning. Thank you for this opportunity to testify. I am writing to express my concerns related to the Massachusetts General Brigham's proposed new ambulatory expansion site that will be located in Woburn; DoN 21012113-AS. This multi-million dollar expansion would have a massive negative impact on the cost of care and the ability for local community health care organizations to continue to support our residents.

I agree that great health care, delivered in the community for a lower cost is what is best for residents of the Commonwealth. However, I believe that the expansion of Mass General Brigham (MGB) ambulatory services into Woburn will increase the cost of care in our community without increasing the quality of care for patients. MGB has a track record of merging, acquiring or pushing out community health care systems and then pricing services at a higher cost, increasing the financial burden placed upon patients throughout the Commonwealth.

Woburn is not a medically underserved community. Woburn is already well-served by high-quality, low-cost healthcare providers. Approving MGB's application to expand into our community will threaten the financial viability of local practitioners and smaller health care systems, replacing quality care offered at affordable rates by local medical institutions with the same services at higher price points. Any increases to the cost of care are unacceptable and untenable in an already highly expensive market. I believe that the expansion of Mass General Brigham (MGB) ambulatory services into Woburn will threaten essential local jobs and the financial viability of critical community care institutions.

I believe that the expansion of Mass General Brigham (MGB) ambulatory services into Woburn is likely to worsen existing health disparities. The proposed MGB sites target higher income, predominantly white, mobile, commercially insured populations already served by existing providers. The proposed locations are not easily accessible to residents of low-income communities with barriers to health care, leaving access and the needs of many residents behind. MGB will be drawing commercially insured patients away from local community providers who rely on that care to subsidize patients that are insured by public programs, such as Medicare or Medicaid, or who are uninsured. Our local community providers will continue to serve those patients even if their commercial volume is negatively impacted by MGB. However, these same providers may be financially forced to close much needed medical services, resulting in reduced safety net care for our communities' most vulnerable patients, while the most privileged migrate to MGB.

In closing, I truly believe in health care cost-containment, partnership, and the spirit of equitable collaboration where all sizes and types of healthcare organizations work together to benefit their communities. I respectfully ask MDPH to closely look at this request and do a full data analysis and hold additional public hearings. Furthermore, consider the fact that the real opportunity is to optimize the use of existing health care services rather than approve services that are not needed.

Sincerely,

Jennifer Manning
200 West Wyoming Avenue
Melrose, MA 02176
jennifer.aidan@gmail.com

From: [Jennifer Yorko](#)
To: [DPH-DL - DoN Program](#)
Subject: STOP the Mass General Brigham outpatient center
Date: Monday, March 29, 2021 5:12:30 PM

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Dear Madams and Sirs:

I am writing as a lifelong Winchester resident and employee of Winchester Hospital to voice my strong **opposition against** the Mass General Brigham outpatient center proposed for Woburn, MA for several reasons:

- This outpatient center will increase healthcare costs in the Commonwealth as Mass General Brigham has much higher reimbursements than other health care systems, even when care is provided in the community.
- This outpatient center will further expand the Mass General Brigham monopoly, which will also contribute to driving up health care costs. Even during the pandemic, Mass General Brigham profits were over \$1 billion, in part due to their monopoly and higher reimbursements.
- Given the ample supply of primary care physicians, specialty care physicians, ambulatory surgery, and other community hospital services currently available in the Woburn area, this proposed outpatient center includes duplicative services and presents an unnecessary threat to the local physician practices and community hospitals, including Winchester Hospital and Melrose-Wakefield Healthcare.
- This outpatient center will endanger our private medical practices, where primary care physicians and specialists are offering exceptional care at lower costs. Our local physicians include some of the highest reputation physicians in the region, providing high quality care at a much lower cost, as compared to Mass General Brigham providers.
- Community hospitals and private practices cannot fairly compete against the Mass General Brigham 800 pound gorilla. Approval of this outpatient center could result in putting high value providers (high quality and low cost) out of business.

Prior to working at Winchester Hospital, I worked at the Brigham and have also worked at MGH earlier in my career. I have tremendous respect for the role that these premier institutions play in the MA and national healthcare landscape. But patients come to my center and other Winchester Hospital departments, despite our proximity to Boston, because they want something different that only a hospital focused on the community will have. We live, work, play, educate our

children, and support the communities our patients live in because we live here too. In addition to delivering great quality care at a lower cost, we fulfill a need for these patients that cannot be fulfilled by MGB because we have a different set of community-oriented priorities. With the industry shift towards population health and a strong focus on keeping people well, we should be doing more to support community hospitals while the large AMCs do what they do best downtown. This supports the success of BOTH the community practices and the large city systems, and ensures that patients always have a choice and a voice.

Please **STOP** this project to prevent escalation of healthcare costs, preserve private medical practice, protect community hospitals, and maintain high value care for the patients and employers of the region.

Sincerely,

Jennifer Yorko

Jennifer Yorko

Director, Oncology Service Line



Winchester Hospital

620 Washington St. Winchester, MA 01890

winchesterhospital.org

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From: [Jessica Hellums](#)
To: [DPH-DL - DoN Program](#)
Subject: OPPOSE MGH Brigham outpatient centers
Date: Monday, March 29, 2021 7:28:06 PM

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Dear Madams and Sirs:

I am writing as a Massachusetts resident to voice my strong **opposition against the Mass General Brigham outpatient center proposed for Woburn, MA** for several reasons:

- This outpatient center will increase healthcare costs in the Commonwealth as Mass General Brigham has much higher reimbursements than other health care systems, even when care is provided in the community.
- This outpatient center will further expand the Mass General Brigham monopoly, which will also contribute to driving up health care costs. Even during the pandemic, Mass General Brigham profits were over \$1 billion, in part due to their monopoly and higher reimbursements.
- Given the ample supply of primary care physicians, specialty care physicians, ambulatory surgery, and other community hospital services currently available in the Woburn area, this proposed outpatient center includes duplicative services and presents an unnecessary threat to the local physician practices and community hospitals, including Winchester Hospital and Melrose-Wakefield Healthcare.
- This outpatient center will endanger our private medical practices, where primary care physicians and specialists are offering exceptional care at lower costs. Our local physicians include some of the highest reputation physicians in the region, providing high quality care at a much lower cost, as compared to Mass General Brigham providers.
- Community hospitals and private practices cannot fairly compete against the Mass General Brigham 800 pound gorilla. Approval of this outpatient center could result in putting high value providers (high quality and low cost) out of business.

STOP this project to prevent escalation of healthcare costs, preserve private medical practice, protect community hospitals, and maintain high value care for the patients and employers of the region.

Sincerely,

Jessica Hellums, MD

April 16, 2021

To the DoN Committee:

My name is Joan Ford Mongeau. Thank you for this opportunity to testify. I am writing to express my concerns related to the Massachusetts General Brigham's proposed new ambulatory expansion site that will be located in Woburn; DoN 21012113-AS. This multi-million dollar expansion would have a negative impact on the cost of care and the ability for local community health care organizations to continue to support our residents.

I write to you today from the perspective of someone who lived in the community for over 50 years, who works in the community and who has received care from MelroseWakefield Healthcare. In addition, my extensive family and friend network, representing all socio-economic levels, receive high quality, low cost care at MelroseWakefield. Some are people who could afford any care; others have income and mobility restrictions. But, where a choice is optional, most choose to support local, community care.

I agree that great health care, delivered in the community for a lower cost is what is best for residents of the Commonwealth. However, I believe that the expansion of Mass General Brigham (MGB) ambulatory services into Woburn will increase the cost of care in our community without increasing the quality of care for patients. MGB has a track record of merging, acquiring or pushing out community health care systems and then pricing services at a higher cost, increasing the financial burden placed upon patients and employers throughout the Commonwealth.

Woburn is not a medically underserved community. Woburn is already well-served by high-quality, low-cost healthcare providers. Approving MGB's application to expand into our community will threaten the financial viability of local practitioners and smaller health care systems, replacing quality care offered at affordable rates by local medical institutions with the same services at higher price points. Any increases to the cost of care are unacceptable and untenable in an already highly expensive market. I believe that the expansion of Mass General Brigham (MGB) ambulatory services into Woburn will threaten essential local jobs and the financial viability of critical community care institutions.

I believe that the expansion of Mass General Brigham (MGB) ambulatory services into Woburn is likely to worsen existing health disparities. The proposed MGB sites target higher income, predominantly white, mobile, commercially insured populations already served by existing providers. The proposed locations are not easily accessible to residents of low-income communities with barriers to health care, leaving access and the needs of many residents behind. MGB will be drawing commercially insured patients away from local community providers who rely on that care to subsidize patients that are insured by public programs, such as Medicare or Medicaid, or who are uninsured. Our local community providers will continue to serve those patients even if their commercial volume is negatively impacted by MGB. However, these same providers may be financially forced to close much needed medical services, resulting in reduced safety net care for our communities' most vulnerable patients, while the most privileged migrate to MGB.

In closing, I truly believe in health care cost-containment, partnership, and the spirit of equitable collaboration where all sizes and types of healthcare organizations work together to benefit their communities. I respectfully ask MDPH to closely look at this request and do a full data analysis and hold additional public hearings. Furthermore, consider the fact that the real opportunity is to optimize the use of existing health care services rather than approve new services that are not needed.

Sincerely,

Joan Ford Mongeau

69 Old Nugent Farm Road, Gloucester, MA 01930



From: [Joan](#)
To: [DPH-DL - DoN Program](#)
Subject: DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS
Date: Friday, April 16, 2021 4:41:19 PM

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

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

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

Joan
joanfranke@gmail.com
Reading

From: [Joanna Boylan](#)
To: [DPH-DL - DoN Program](#)
Subject: Mass General Brigham Woburn Integrated Care Facility
Date: Thursday, April 01, 2021 11:26:07 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.

To Whom It May Concern:

I have been receiving my care at Brigham and Women's since I was 18 years old so when I heard that Mass General Brigham would be bringing their resources next door, at the new site in Woburn, I was overjoyed. My husband and I currently travel to 75 Francis for all our health needs, including our PCP, and it's wildly inconvenient. To have the opportunity of care in our community would make a huge difference. My husband has a prescription that requires him to physically pick it up at BWH once a month. I go into Brigham for every women's health appointment and dermatology check up. Local organizations aren't losing our business because we've been a MGB family for decades. Having access to our health care network would alleviate the stress of heading to 75 Francis and allow greater appointment flexibility, more resources nearby, and the freedom to choose.

I understand that local hospitals and health care organizations are scared that a project like this might take patients away but I believe in patient choice. I have chosen not to go to an existing local community provider for decades because I love Brigham. My family should have the same rights as the patients that choose existing local care. Legislators should be fighting for patient choice instead of restricting our opportunities. Greater access to health care is always better for a community.

Thank you.

Joanna Boylan

**Joanna Boylan
9 Taft Drive
Winchester**

From: [JOANNE GREGA](#)
To: [DPH-DL - DoN Program](#)
Subject: Mass General Brigham Outpatient Center - Woburn - Opposed
Date: Friday, April 02, 2021 9:52:00 AM

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

Dear Madams and Sirs:

I am writing as an employee of Winchester Hospital to voice my strong **opposition against the Mass General Brigham outpatient center proposed for Woburn, MA** for several reasons:

- This outpatient center will increase healthcare costs in the Commonwealth as Mass General Brigham has much higher reimbursements than other health care systems, even when care is provided in the community.
- This outpatient center will further expand the Mass General Brigham monopoly, which will also contribute to driving up health care costs. Even during the pandemic, Mass General Brigham profits were over \$1 billion, in part due to their monopoly and higher reimbursements.
- Given the ample supply of primary care physicians, specialty care physicians, ambulatory surgery, and other community hospital services currently available in the Woburn area, this proposed outpatient center includes duplicative services and presents an unnecessary threat to the local physician practices and community hospitals, including Winchester Hospital and Melrose-Wakefield Healthcare. There is additional capacity that our local community hospitals can and are willing to accommodate as needed.
- This outpatient center will endanger our private medical practices, where primary care physicians and specialists are offering exceptional care at lower costs. Our local physicians include some of the highest reputation physicians in the region, providing high quality care at a much lower cost, as compared to Mass General Brigham providers.
- Community hospitals and private practices cannot fairly compete against the Mass General Brigham 800 pound gorilla. Approval of this outpatient center could result in putting high value providers (high quality and low cost) out of business.

STOP this project to prevent escalation of healthcare costs, preserve private medical practice, protect community hospitals, and maintain high value care for the patients and employers of the region.

Sincerely,
Joanne Grega

From: [Joanne Munroe](#)
To: [DPH-DL - DoN Program](#)
Subject: Mass General Brigham
Date: Tuesday, March 30, 2021 1:45:18 PM

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Dear Madams and Sirs:

I am writing as a employee of Paul N. Chervin, M.D. and Albert L. Fullerton, M.D. to voice my strong **opposition against the Mass General Brigham outpatient center proposed for Woburn, MA for several reasons:**

- This outpatient center will increase healthcare costs in the Commonwealth as Mass General Brigham has much higher reimbursements than other health care systems, even when care is provided in the community.
- This outpatient center will further expand the Mass General Brigham monopoly, which will also contribute to driving up health care costs. Even during the pandemic, Mass General Brigham profits were over \$1 billion, in part due to their monopoly and higher reimbursements.
- Given the ample supply of primary care physicians, specialty care physicians, ambulatory surgery, and other community hospital services currently available in the Woburn area, this proposed outpatient center includes duplicative services and presents an unnecessary threat to the local physician practices and community hospitals, including Winchester Hospital and Melrose-Wakefield Healthcare.
- This outpatient center will endanger our private medical practices, where primary care physicians and specialists are offering exceptional care at lower costs. Our local physicians include some of the highest reputation physicians in the region, providing high quality care at a much lower cost, as compared to Mass General Brigham providers.
- Community hospitals and private practices cannot fairly compete against the Mass General Brigham 800 pound gorilla. Approval of this outpatient center could result in putting high value providers (high quality and low cost) out of business.

STOP this project to prevent escalation of healthcare costs, preserve private medical practice, protect community hospitals, and maintain high value care for the patients and employers of the region.

Sincerely,

Joanne Munroe

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From: [Jody Naimark](#)
To: [DPH-DL - DoN Program](#)
Subject: MGH outpatient facility
Date: Monday, March 29, 2021 1:16:39 PM

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Dear Department of Health,

I am a Family Physician and I have been practicing in Tewksbury since 1989 and a member of the Winchester Hospital medical staff since 1999. I am also the medical director of the Family Care Centers in Tewksbury and in Stoneham at 88 Montvale Avenue.

I am very concerned about the construction of a MGH outpatient surgical center and office building in Woburn. This is within 1 mile of Winchester Hospital on Highland Avenue, the Winchester out-patient surgical center on Washington, and numerous primary care and specialty offices on Montvale Ave all affiliated with Winchester Hospital. In addition there is a Hallmark Hospital out-patient presence in the direct area.

There is no need for additional medical services in such a close geographic area. Building this new facility would only serve to severely curtail and possibly destroy the medical practices and facilities that have been an integral part of the community for decades. The current medical practices and facilities not only offer excellent care, they do it at a fraction of the cost of MGH.

Please strongly consider not allowing this project to go forward. I foresee it being a disaster for the practices and facilities that already exist and are doing such an excellent job.

Thank you for your consideration,

Sincerely,

Jody Naimark MD
Family Care Center Tewksbury
Family Care Centers Medical Director
WPA EPIC Medical Director

[REDACTED]

jody.a.naimarkmd@lahey.org



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April 16, 2021

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 submit written testimony on behalf of Lowell General Hospital regarding Mass General Brigham's (MGB) proposed expansion into Woburn, which is part of a broader proposal to create or expand ambulatory surgical services also in the areas of Westwood and Westborough.

Lowell General Hospital serves the Greater Lowell area and surrounding communities, with two hospital campuses in the City of Lowell, an ambulatory surgical center in Chelmsford, as well as urgent care centers in Westford, Dracut, Billerica, and Tewksbury. Our system serves several communities proximate to MGB's proposed expansion in Woburn including Billerica and Tewksbury which are in our primary service area, and Wilmington and Andover which are in our secondary service area.

We have concerns regarding MGB's application to establish an outpatient center that will serve communities we already provide with measurably higher-value care. We are concerned these proposed projects will shift more higher margin commercial volume away from community hospitals and thereby reduce the resources available to support vital access to care for and our patients, particularly low-income populations of color. We believe MGB's proposal is out of synch with the Commonwealth's goals to improve both health care access and cost, a hallmark of Lowell General's success.

Increased Cost of Care

We are concerned the expansion of MGB ambulatory services into Woburn will increase the cost of care in our communities without increasing the quality of care. 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 data show that outpatient hospital spending is a key driver of these skyrocketing costs.

In its Determination of Need (DoN) application, MGB claims 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 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. Mass General Hospital, for example, is on average paid 42 percent more for an inpatient stay than Lowell General Hospital for the exact same level of care. An MGB outpatient center will further exacerbate cost increases for patients by pulling them away from appropriate, less expensive local care settings.

Payor Mix Disparities

Each of the proposed MGB outpatient sites are located in communities with a higher income, predominantly commercially insured population. Each town listed in the Woburn service area is above the state's median household income, with an average of 150 percent of the state median.

In response to how its outpatient centers would address economic, social and/or environmental disadvantages in its proposed project communities, MGB 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, particularly when paired with the fact that only 12.3 percent of MGB's statewide payor mix is Medicaid, as compared to 22 percent at Lowell General and 19.1 percent at Wellforce. This claim warrants a request for further explanation and examination.

There is already a significant payor mix difference between MGB and Lowell General Hospital. Massachusetts' top three commercial insurers account for 42 percent of MGB's payor mix, whereas they only comprise 22 percent of Lowell General Hospital's. Thirty-one percent of MGB's payor mix comes from government payers, contrasted with 64 percent of Lowell General Hospital's.

MGB's selected locations for its outpatient centers will likely shift more commercial insurance patient volume to MGB 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 diminish providers who prioritize caring for MassHealth patients and the critical access they provide. MGB's expansion will further perpetuate existing payor mix disparities, rather than increase access to medical services.

As part of the review process, we seek to understand whether MGB's Woburn site will increase the volume of commercially insured patients seeking care at higher cost providers. This was not addressed in the MGB application.

Threat to Community Hospitals

In addition to the disruption of payor mix among local health systems, we are concerned that MGB will recruit local practitioners away from community healthcare providers will undermine both profitability and capacity to provide critical healthcare services.

We have concerns that MGB has not shared its 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 Woburn 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 Woburn, their application states they are hiring a full spectrum of providers to fill required roles at new ambulatory facilities. Similar to points raised about duplication of care, clarity around whether there will be a concerted effort to shift care or if new hiring will be the primary focus of MGB's recruitment approach will be key to understanding the impact of MGB's expansion. MGB does not mention of repurposing square footage at MGH given the supposed shift of existing care, and is seeking DPH's approval of a \$1.9 billion patient room tower in downtown Boston.

Increasing Market Dominance of a Higher Priced Provider

The proposal would also bolster MGB's market predominance.

MGB is already the most profitable healthcare system in the Commonwealth by a landslide, 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 Woburn is finite. Rather than addressing actual need, these expansion proposals will likely increase MGB's patient panel and increase referrals within its own expensive system. Our local providers, employers and community members will be impacted by more care being delivered by higher priced providers.

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, appearing to read "Jody White". The signature is fluid and cursive, with the first letter of each word being capitalized and prominent.

Jody White
President and CEO
Lowell General Hospital

From: jcostas@medfordelectronics.com
To: [DPH-DL - DoN Program](#)
Subject: Testimony - Mass General Brigham Incorporated – Multisite - 21012113-AS
Date: Tuesday, April 06, 2021 4:58:40 PM

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

Good Morning, my name is John Costas and I am the President of the Medford Chamber of Commerce, also past president of the Medford Civic Auditorium and Convention Center Commission, I am also on the board for the Kiwanis association of Medford as well as a Medford Resided and owned a business in Medford for over 40 years .

I am deeply concerned with the expansion of MGB into Woburn as it relates to our community.

This will have a financially negative impact on our local health providers. Woburn is already well-served by established healthcare systems. The development of an ambulatory surgery center in Woburn would enable MGB to cherry-pick commercially insured patients from pre-existing care providers. This may force our local healthcare systems to raise costs for commercially-insured patients or cut critical services, due to a lack of patients.

It will also allow larger institutes like MGB to influence and raise healthcare costs since local competition will be diminished and we could possibly lose healthcare service lines as well as locations that are needed by low-income residents.

Several years ago, a merger between then-Hallmark Health and Partners was rejected because of the threat of a monopoly. Why is this project any different? MGB should be held to the same standards.

**<!--[if !supportLineBreakNewLine]-->
<!--[endif]-->**

Lawrence memorial hospital and Melrose-Wakefield Hospital is our community healthcare provide and has spent a lot and money to create a first-class healthcare facility for ambulator care and we don't want to see all their time and money go to waist

This whole project does not sound good for all communities that offer these healthcare services and for the patients that rely on them.

**<!--[if !supportLineBreakNewLine]-->
<!--[endif]-->**

**Thank You
John Costas
President
Medford Chamber of Commerce**

Past President of the Civic Auditorium and Convention Center Commission

From: [John](#)
To: [DPH-DL - DoN Program](#)
Subject: DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS
Date: Friday, April 16, 2021 9:05:08 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.

John
denison.john.22@gmail.com
Andover

From: [John Hutcheson](#)
To: [DPH-DL - DoN Program](#)
Subject: Please stop MGB from expanding into a well served area in Woburn.
Date: Tuesday, March 30, 2021 8:16:31 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.

Dear Madams and Sirs:

I am writing as a private practice, senior medical staff member at Winchester Hospital where I have had to voice my strong **opposition against the Mass General Brigham outpatient center proposed for Woburn, MA for several reasons:**

- This outpatient center will increase healthcare costs in the Commonwealth as Mass General Brigham has much higher reimbursements than other health care systems, even when care is provided in the community.
- This outpatient center will further expand the Mass General Brigham monopoly, which will also contribute to driving up health care costs. Even during the pandemic, Mass General Brigham profits were over \$1 billion, in part due to their monopoly and higher reimbursements.
- Given the ample supply of primary care physicians, specialty care physicians, ambulatory surgery, and other community hospital services currently available in the Woburn area, this proposed outpatient center includes duplicative services and presents an unnecessary threat to the local physician practices and community hospitals, including Winchester Hospital and Melrose-Wakefield Healthcare.
- This outpatient center will endanger our private medical practices, where primary care physicians and specialists are offering exceptional care at lower costs. Our local physicians include some of the highest reputation physicians in the region, providing high quality care at a much lower cost, as compared to Mass General Brigham providers.
- Community hospitals and private practices cannot fairly compete against the Mass General Brigham 800 pound gorilla. Approval of this outpatient center could result in putting high value providers (high quality and low cost) out of business.

STOP this project to prevent escalation of healthcare costs, preserve private medical practice, protect community hospitals, and maintain high value care for the patients and employers of the region.

Sincerely,

John Hutcheson, MD

Chairman, Department of Anesthesia

Immediate Past President, Medical and Allied Staff

Winchester Hospital



Winchester Hospital

41 Highland Avenue, Winchester, MA

WinchesterHospital.org

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April 14, 2021

To: The DoN Committee:

My name is John J. Smolinsky and I am the Executive Director of the Wakefield Lynnfield Chamber of Commerce. I would first like to express my thanks to you for providing this opportunity for me to submit this testimony not only on my own behalf but also that of the Chamber Board of Directors. We wish to express our concerns related to the Massachusetts General Brigham's proposed new ambulatory expansion site that will be located in Woburn; identified as DoN 21012113-AS.

It is our collective belief that this multi-million dollar expansion would have a massive negative impact on the cost of care and the ability for local community health care organizations to continue to support our local residents. We know that great health care, delivered in the community for a lower cost is what is best for all residents of the Commonwealth. The expansion of Mass General Brigham (MGB) ambulatory services into Woburn will increase the cost of that care in our local community without increasing the quality of care for patients.

Currently, Woburn is not a medically underserved community and is already well-served by high-quality, low-cost healthcare providers. In our opinion, approving MGB's application to expand into our community will threaten the financial viability of local practitioners and smaller health care systems. While duplicating the quality care already being offered at affordable rates by local medical institutions with higher and more expensive price points.

It is our belief that any increases to the cost of medical care is unacceptable and untenable in what is already highly expensive market. We believe that the expansion of Mass General Brigham (MGB) ambulatory services into Woburn would potentially threaten essential local jobs and the financial viability of critical community care institutions.

In closing, we truly believe in health care cost-containment, partnership, and the spirit of equitable collaboration where all sizes and types of healthcare organizations work together to benefit their communities. We respectfully ask MDPH to closely look at and scrutinize this Mass General Brigham (MGB) request and do a full cost analysis and hold additional public hearings once this analysis has been completed. Furthermore, consider the fact that the real opportunity is to optimize the use of existing health care services rather than approve new services that are not needed.

Sincerely,

John Smolinsky
Executive Director

Wakefield Lynnfield Chamber of Commerce
5 Common Street
PO Box 585
Wakefield, MA 01880
[REDACTED]

From: [John Dubrow](#)
To: [DPH-DL - DoN Program](#)
Subject: Possible MGB expansion project in Woburn
Date: Friday, April 09, 2021 2:47:59 PM

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Dear Madams and Sirs:

I am writing as Chairman of Radiology at Winchester Hospital who has served the community of Winchester Hospital for 31 years and to add to voice my strong **opposition against** the Mass General Brigham outpatient center proposed for Woburn, MA for several reasons:

- This outpatient center will increase healthcare costs in the Commonwealth as Mass General Brigham has much higher reimbursements than other health care systems, even when care is provided in the community.
- Given the availability of primary care physicians, specialty care physicians, ambulatory surgery, CT scans, MRIs, and other community hospital services currently available in the Woburn area, this proposed outpatient center includes duplicative services and presents an unnecessary threat to the local physician practices and community hospitals, including Winchester Hospital and Melrose-Wakefield Healthcare. I have first hand knowledge of this aspect of the project as a long time radiologist at Winchester and having served as Dept. Chair for 5 years.
- This outpatient center will endanger our private medical practices, where primary care physicians and specialists are offering exceptional care at lower costs. Our local physicians include some of the highest reputation physicians in the region, providing high quality care at a much lower cost, as compared to Mass General Brigham providers. Winchester Hospital is known as a low cost place of service which is very important in the current environment of rising health care costs.
- Approval of this outpatient center would threaten the ability of existing high value providers (high quality and low cost) to continue to serve the residents of Woburn and surrounding cities and towns.

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

Thank you for your time and please do not hesitate to contact me if I can be of further assistance.

Sincerely,

--

John S. Dubrow, MD, FACR

President, North Shore Radiological Associates, Inc.
Chairman, Dept. of Radiology, Winchester Hospital



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Prepared Comments for MGB Determination of Need Public Hearing

Good morning, my name is Jonathan Joyner. Thank you for the opportunity to offer my thoughts on MGB's community expansion plans.

For almost ten years, I have served in various market intelligence and business planning roles in the Massachusetts healthcare market, including time as an internal strategy consultant for MGB. I currently serve as Director of Corporate Development for Shields Health Care. As you can imagine, I have a nuanced perspective on the proposed expansion.

Having stepped through the regulatory approval process on many occasions, I am well versed in the objectives of the Determination of Need. Namely, to encourage competition, support the development of innovative delivery methods, and ensuring access to health care resources at the lowest cost possible.

The recent push by MGB to expand their ambulatory footprint is cause for concern. Consolidation and subsequent cannibalization of existing community providers stifles competition, curbs innovation, and extends a higher cost structure into the community. When viewed in aggregate, the expansion objectives of MGB represent the antithesis of the DoN's objectives.

For your consideration, I'd like to focus in on Factor 1 – Evidence of Need. The foundational element of this regulatory approval process. In this most recent expansion push, MGB plans to add 8 total MRI units to their existing 54 units across their network – for a total 62 machines. 2 of the new units are proposed at the Woburn location. Of note, the Woburn location is under 8 miles and a 15-minute drive time from the recently approved Somerville MRI machines, and at least 6 other competitor machines.

MGB's recent DoN Application notes that their patient panel consisted of ~1.53M unique patients in FY19. Industry best practices suggest that 10% of a given population requires an MRI – meaning 153k MGB patients require an MRI. In conjunction, the DPH's staff report for the Somerville application concluded that ~5,200 MRIs per machine is a reasonable utilization assumption. Therefore, the proposed 62 machines offers the capacity to scan 322k patients – significantly overshooting the 153k patient panel need. This is a perfect example of oversaturation. The excess capacity is meant to capture market share. The safe assumption is that this same excess capacity is applicable across all proposed service lines and modalities.

I speak as not just a market competitor, but as a taxpayer, a commercial insurance enrollee and a student of local healthcare market dynamics. There is fundamentally no justifiable need for this expansion other than the insatiable thirst for market dominance. Approval of these expansion plans by this committee is an affront to it's own charter; the price of which will be borne by all of us.

From: [Joseph Czarnecki](#)
To: [DPH-DL - DoN Program](#)
Subject: Notice of Virtual Public Hearing Concerning Massachusetts General Brigham
Date: Thursday, March 25, 2021 8:10:29 AM

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Dear Madams and Sirs:

I am writing as a Woburn business person, orthopaedic surgeon who trained at Massachusetts General and Brigham, and Lexington resident to voice my strong **opposition against** the proposed project for several reasons:

- This project will increase health care costs as MGB has much higher reimbursements than other health care systems.
- This project will further create a monopoly, driving up health care costs and reducing diversity. MGH profited over \$1Billion during a pandemic because of their monopoly and higher costs and reimbursements.
- This project will endanger Winchester Hospital - the first hospital in Massachusetts to receive Magnet certification, and winner of several Press Ganey awards for outstanding outpatient surgery experiences.
- This project will endanger private medical practices such as Excel Orthopaedic Specialists, where we have 7 surgeons who trained at MGH institutions, offering exceptional care, but at community hospital costs. I and my fellow surgeons in practice are some of the highest reputation surgeons in the Boston region, providing tertiary level care including performing revision knee, shoulder, hip, ankle and cartilage surgeries at the same or higher level than those at MGH or Brigham, at a much lower cost.
- Community hospitals and private practices cannot compete fairly against the 800 pound gorilla of MGB.

STOP this project to prevent escalation of health care costs, preserve private medical practice diversity, protect community hospitals and maintain the highest level of quality of care.

Sincerely,

Joseph J. Czarnecki, MD

From: [Joshua Tam](#)
To: [DPH-DL - DoN Program](#)
Subject: Mass General Brigham proposed Woburn facility
Date: Tuesday, April 13, 2021 8:17:54 PM

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I am writing in support of the proposed Woburn facility by Mass General Brigham. I am a resident of Andover MA, myself and my family have received excellent care from MGH for nearly 20 years, and I believe having nearby access to this wonderful healthcare system would be very beneficial for this area.

Thank you,

Josh Tam (8 Cottage Road, Andover)

From: [jude telfort](#)
To: [DPH-DL - DoN Program](#)
Subject: NO to Outpatient Center in Woburn
Date: Monday, March 29, 2021 8:25:08 PM
Attachments: [image.png](#)

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Dear Madams and Sirs:

I am writing as an employee of Winchester Hospital to voice my strong **opposition against** the *Mass General Brigham* outpatient center proposed for Woburn, MA for several reasons:

- This outpatient center will increase healthcare costs in the Commonwealth as *Mass General Brigham* has much higher reimbursements than other health care systems, even when care is provided in the community.
- This outpatient center will further expand the *Mass General Brigham* monopoly, which will also contribute to driving up health care costs. Even during the pandemic, *Mass General Brigham* profits were over \$1 billion, in part due to their monopoly and higher reimbursements.
- Given the ample supply of primary care physicians, specialty care physicians, ambulatory surgery, and other community hospital services currently available in the Woburn area, this proposed outpatient center includes duplicative services and presents an unnecessary threat to the local physician practices and community hospitals, including Winchester Hospital and Melrose-Wakefield Healthcare.
- This outpatient center will endanger our private medical practices, where primary care physicians and specialists are offering exceptional care at lower costs. Our local physicians include some of the highest reputation physicians in the region, providing high quality care at a much lower cost, as compared to *Mass General Brigham* providers.
- Community hospitals and private practices cannot fairly compete against the *Mass General Brigham* 800 pound gorilla. Approval of this outpatient center could result in putting high value providers (high quality and low cost) out of

business.

STOP this project to prevent escalation of healthcare costs, preserve private medical practice, protect community hospitals, and maintain high value care for the patients and employers of the region.

Sincerely,

Jude Telfort, M.D.

Department of Anesthesia

Winchester Hospital



Beth Israel Lahey Health 
Winchester Hospital

From: [Julia](#)
To: [DPH-DL - DoN Program](#)
Subject: DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS
Date: Friday, April 16, 2021 4:37:15 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.

Julia
jmcquade86@gmail.com
Stoneham

From: [Julie](#)
To: [DPH-DL - DoN Program](#)
Subject: DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS
Date: Friday, April 09, 2021 2:23:31 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.

Julie
julesrn1227@aol.com
North Reading

From: [Justine](#)
To: [DPH-DL - DoN Program](#)
Subject: DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS
Date: Tuesday, April 13, 2021 9:00:47 PM

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

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

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

Justine
justinetres@gmail.com
Lexington