

**From:** [Marcia Kirssin](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** Proposed Woburn Ambulatory Care Center  
**Date:** Thursday, April 15, 2021 6:53:55 PM

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April 15, 2021

To: The Don Committee

Thank you for the opportunity to testify in regard to the proposed MassGeneral-Brigham Ambulatory Surgical Center in Woburn DON 21012 113-AS. I strongly oppose the proposed expansion and urge you to please consider the plentiful availability of medical services and the potential negative impact an Ambulatory Surgical Center would have on Woburn and surrounding communities.

There are already two Ambulatory Surgical Centers accessible to Woburn residents located in Winchester and Medford. While Ambulatory Surgical Centers serve a significant number of individuals, their services do leave out citizens -- many of which are our community's most vulnerable. The populations best served by these centers generally do not include the very young, the disabled, older persons, and people in unserved communities.

Our local healthcare providers have worked hard to provide high-quality, holistic care right here in our community. By allowing Mass General Brigham to expand other ambulatory care services into our region we are putting our community care and safety net facilities at risk. Cherry picking commercial payers -- those best served by ambulatory care sites -- from our local care providers threatens the viability of many critical service lines. This includes emergency services, community health services, behavioral health support and those specialists who work within our local medical centers. There is much to be lost if this expansion is approved to go forward.

In addition to the potential loss of care and lack of expansion of necessary medical services already available in the Woburn area, I am also incredibly concerned about the rising cost of care -- particularly for those underserved populations utilizing Medicare or Medicaid.

I urge you to please consider these arguments as you weigh the negative impact of the proposed MGH expansion into Woburn.

Marcia Kirssin, Ph.D

11 Upton Terrace

Medford, MA 02155

April 13, 2021

DoN Support  
67 Forrest Street  
Marlborough, MA 01752

RE: Mass General Brigham-Woburn Hearing-3/25/21

To Whom This May Concern:

I would like to thank you for your time and efforts in working with the MGB Team on the proposed expansion of ambulatory care in Woburn. Please allow me to say that I feel the expansion is fervently needed in the Woburn area.

On March 25, 2021, I was fortunately invited to listen in on the telephone hearing held for the aforementioned expansion. I would also like to thank you for that opportunity. It was interesting to hear that the majority of callers' comments were from folks within the medical field and affiliated with medical providers other than Mass General Brigham. As I am familiar with many of the providers calling in, I found myself getting angered with their extremely biased and fearful comments.

Currently, I am living in Woburn Elder Housing. Allow me to introduce myself. I have been a resident of Woburn for the past 11 years. For all this time I have been searching for a Primary Care Physician. My primary care at that time, (2011), was located in Burlington and not affiliated with MGB. She suddenly left the practice for an unknown reason. This has been my problem since then. Presently, my primary care physician is located in Peabody and I have only seen her once and had a telephone "checkup" with her once, due to the Pandemic.

In 2016, I was diagnosed with Cancer and am very grateful for the referral I received from a physician affiliated with Mt Auburn who stated to me and said "this doctor is the best". The doctor he referred me to is affiliated with Mass Eye and Ear and I am still under his care. Through these past 6 years, I have had the opportunity to meet with many Doctors within the MGB community practicing in fields of medicine other than Cancer.

It is my opinion and privilege to enthusiastically state that I couldn't ask for better care. The opportunity for quality care from MGB in Woburn is urgently needed.

Respectfully,

*Marilyn Kierstead*  
[kiersteadmj@gmail.com](mailto:kiersteadmj@gmail.com)

**From:** [Maria Desousa](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** Please Give Small Medical Practices a Chance - COVID was Hard Enough!  
**Date:** Tuesday, March 30, 2021 7:27:20 PM

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Dear Madams and Sirs:

I am writing as a resident of Woburn, MA 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. **It's the right thing to do for Medical Practices that are doing exceptional work at the community level.**

Thank you

Maria Costa  
Woburn Resident

**From:** [skaff71@aol.com](mailto:skaff71@aol.com)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** MGH outpatient  
**Date:** Friday, April 02, 2021 10:55:21 AM

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Dear Madams and Sirs:

I am writing as a employee of Robert O'Brien & Dermatology Associates in Winchester MA 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,  
Maria Gibbons patient registration coordinator

**From:** [Mark Carzo](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** Proposed Woburn Facility  
**Date:** Thursday, March 25, 2021 11:24:04 AM

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Dear Madams and Sirs:

I am writing in opposition to the proposed Mass General Brigham in Woburn, MA. I grew up in Winchester, moved away after college and returned with my family 21 years ago. One of the key deciding factors to move here again was having a small, personal community hospital in town. My wife left the Boston hospitals and continued as a nurse in the O.R. at Winchester for 16 years before retiring. She knew she could deliver the same care, have a better quality of life and help the community she lived in.

My family and I personally benefited many times from having Winchester Hospital there to help us growing up. We had many visits for care with broken bones, infections and emergent care at Winchester Hospital. I just recently was operated on at Winchester by Excel Orthopedics for a fractured patella after a fall on the ice. They were able to operate on me the same day and give me the highest quality of care from E.R to O.R to having a choice to go home on the same day. They are a caring and responsive group of professionals and we are grateful to have them in our community.

The care and attention to patient needs is unmatched in this community hospital. It has a very high level of skilled and expert Surgeons, Nurses and Medical Staff. The hospital is able to provide these high end services *to the community at a much lower cost than the Boston hospitals*. Along with the personal care and attention to detail you don't get in the big Boston hospitals. It would be a tragedy if this hospital's existence was ever jeopardized from having to many hospitals in the same geographic area. Winchester can offer all of these services combined with their commitment to the community at a much lower cost to the healthcare system.

Brigham Mass General already has a monopoly on the most of the state of Massacussetts and would do the opposite of what everyone is looking for from healthcare. Winchester serves the community, provides first rate care and continues to keep costs in check in this rapidly changing environment. They provide private practice with a place to deliver expert care to the community in which so many of them are members of.

Please listen to the community and STOP this project to drive healthcare cost and quality in the wrong direction.

Thank you for your concern,

Mark Carzo  
Winchester, MA

**From:** [Mark Mastroianni](#)  
**To:** [DPH-DL - DoN Program](#)  
**Cc:** [Mark Mastroianni](#)  
**Subject:** DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS  
**Date:** Thursday, April 15, 2021 10:11:30 AM

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To Whom It May Concern,

We urge the Department of Public Health to approve Mass General Brigham’s ambulatory care site in Woburn. As a local leader in homebuilding, Pulte Homes of New England, LLC, we know the importance of a strong community outside the home. Chosen by the Woburn City Council to help build a new neighborhood in the Vale, we are confident that this healthcare site would benefit the future residents of our neighborhood and the entire Woburn area.

Mass General Brigham already has thousands of current patients in the Woburn area, and this proposed healthcare center will attract even more. Massachusetts remains one of the worst states in the country for congestion, and traffic remains a top issue in residents’ minds.

With this site, local patients would no longer have to travel into Boston to stay in their network. That means less cars on the road for everyone, as patients no longer contribute to the congestion and parking problems associated with driving into the city. With most medical appointments occurring outside of rush-hour, we also believe there will be minimal impact to traffic locally.

With more than 200 permanent jobs and 300 construction jobs, this site will also help jumpstart the local economy as we emerge from COVID-19.

We are proud to work with Woburn on this Vale development. Together with Mass General Brigham, this site will completely transform the gateway into the city.

Thank you for allowing me the opportunity to comment.  
Mark

Mark Mastroianni  
Director – Land Planning and Entitlements  
Pulte Homes of New England LLC  
115 Flanders Road, Suite 200  
Westborough, MA 01581

[REDACTED]  
[REDACTED]

[Mark.mastroianni@pulte.com](mailto:Mark.mastroianni@pulte.com)

**From:** [Marlynn Lievore](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** Opposition against the Mass General Brigham outpatient center proposed for Woburn, MA  
**Date:** Thursday, April 01, 2021 11:38:38 AM

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Dear Madams and Sirs:

I am writing as an employee of Robert J O'Brien Jr MD and Associates PC 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. Mass General Brigham focus is not only on patient care but strongly on making high profits by charging high rates to patients
- 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. Many of these providers are independent, small business and provide patient focused care.
- 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. In addition, Mass General Brigham charges outrageous facility fee to patients that is either not covered by insurance or goes towards deductible. Our local private medical practices do not, making the cost of health care much smaller and advantageous to the patients and insurance companies.
- 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. Our community hospital provide excellent care compatible to the one Mass General Brigham. I like to call our local hospital excellent care as warm and fussy, where everyone care about everyone from patients, to nurses, to providers, to environmental services, maintenance, engineering and etc. In our community patients do no mean a dollar sign, they mean a human being that needs care (whether preventative or tertiary), that has a family, friends and is a contributor to our community.

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,  
Marlynn Lievore



**From:** [Martha McCarty](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** MGB/VALE Project  
**Date:** Friday, April 16, 2021 9:17:07 AM

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Dear Madams and Sirs:

I am writing, as an employee of Winchester Hospital and a Primary Care Provider in the Winchester area, 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 the same 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, primary care and specialist providers, 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,

**Martha McCarty MD FAAP**

Pediatrician

Medical Director



F: 781-643-0035



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Winchester Hospital

ABC Pediatrics 29 Massachusetts Ave Arlington MA

[WinchesterHospital.org](http://WinchesterHospital.org)

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**From:** [Mary Ann](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS  
**Date:** Monday, April 12, 2021 4:03:01 PM

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I have been a patient of Brigham and Women's Hospital (and occasionally Mass. General) for over 35 years, beginning when I lived in Dorchester and continuing since I moved to Melrose in 1995. I have always been highly impressed with and grateful for the care that I receive, and it is very important to me that I be able to maintain this long-term healthcare relationship, particularly as I get older. For this reason, I strongly support Mass General Brigham's project to provide the same healthcare I receive today in Boston at their proposed new facility in Woburn, which is much closer to my home.

I just turned 70 years old and am in generally good health, but as happens for many people as they age, I find myself having to make more frequent visits to the doctor now. Getting to the Boston hospitals by MBTA from where I live is very time consuming, and if I'm feeling ill, a long trek on the MBTA only adds to the stress. Alternatively, I can drive to the Brigham, but that can be equally stressful, and parking is expensive. Although my home is only about 14 miles from the Brigham, my drive in for a doctor visit in pre-pandemic traffic sometimes took as long as two hours one way! Fortunately, I am retired so my time is somewhat more flexible. However, sometimes I need to ask a friend or family member to take me to an appointment either because I don't feel well enough to drive or because I'm having a particular type of treatment that will result in my being unable to drive myself home. In those cases, it's often difficult to find someone who can afford to take a whole or even half day off work to accompany me. When that happens, I may have to delay a visit or treatment in order to accommodate my driver's schedule. Being able to get my healthcare in Woburn would be much more convenient – and less stressful – both for me and for anyone I might need to ask for a ride to some appointments. Most importantly, it would ensure that I am able to get the care I need in a timely fashion.

Aside from my own personal situation, in general we need more access to quality healthcare in our local 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.

For all of the above reasons, I support the Mass General Brigham Woburn project and strongly urge the Department of Public Health to approve this application.

Mary Ann  
malaneq@verizon.net  
Melrose

**From:** [Mary Ellen](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS  
**Date:** Tuesday, April 13, 2021 9:10:04 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.

Mary Ellen  
mferolito@mghihp.edu  
Reading

**From:** [mary](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS  
**Date:** Wednesday, April 14, 2021 8:13:31 AM

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

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

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

mary  
msefton@partners.org  
Lexington

**From:** [Maryjane](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS  
**Date:** Saturday, April 10, 2021 2:08:15 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.

Maryjane  
Mjdd27@verizon.net  
Woburn

**From:** [Matthew McDonald](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** Vale/ MGB Project in Woburn  
**Date:** Friday, March 26, 2021 9:07:17 PM

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Hello,

My name is Matthew J McDonald and I am a Physician Assistant who works in Hospital Medicine at Winchester Hospital. I recently became aware of the potential development of a Mass General Brigham outpatient center on Montvale Ave in Woburn.

I have some concerns about the potential expansion of MGB, as it would obviously threaten the future viability of Winchester Hospital and the medical community affiliated to Winchester Hospital. This could affect my own job as well as the job security/careers of countless other dedicated frontline workers and medical staff.

The services provided by the new MGB outpatient center would likely increase the cost of care of the patients in the community; MGB apparently charges nearly 2-3x as much money for medical care compared to Winchester Hospital, which would increase the burden of medical costs in a vulnerable population. While Winchester Hospital is situated in a rather affluent community, our services are utilized by patients from many surrounding towns, including Reading, Stoneham, Wakefield, Medford, Malden, Everett, Wilmington, etc.. and this would force many of those patients to incur higher health care costs if they began utilizing the MGB health care system should Winchester close.

While I understand that MGB is a great healthcare system (my primary care physician is part of MGB) and that competition among health care systems can be a good thing, it seems as though this is a financially driven maneuver to expand into a community that already has a well-established health care system in order to siphon patients. Ultimately, this move could do more harm than good in the community if enough patients are siphoned and Winchester has to close - this would result in the loss of yet another Massachusetts community hospital.

This has been a difficult year for frontline workers, and now that we are getting closer by the day to moving beyond this pandemic, the employees of Winchester Hospital now have to worry about the future of our hospital and jobs.

I would like to request that the Health Policy Commission evaluate this project to determine, with additional community and healthcare worker input, whether this expansion will truly benefit the community, or will it put undue stress on an already strained community hospital.

Thank you,

Matthew J McDonald, PA-C  
New England Inpatient Specialists  
Winchester Hospital

**From:** [Maura](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS  
**Date:** Friday, April 16, 2021 4:49:39 PM

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As a local resident and Mass General Brigham employee, I support the MGB proposal for an ambulatory facility in Woburn, bringing world class care to my community. Easy access to care is critical to optimizing care and care coordination. COVID-19 has shown this to be particularly true - the presence of the MGB urgent care facility in Woburn made my family's life so much easier during the COVID pandemic when we needed acute unscheduled care. We were able to get the care we needed without battling the traffic and parking issues we have when going to the Boston facilities. I also know that MGB is committed to ensuring the health of their communities. I have seen first hand the support MGB has provided to Chelsea and other MGB communities disproportionately impacted by the pandemic. I know Woburn and it's surrounding communities will benefit from this proposed facility.

Maura  
kennedy\_maura@hotmail.com  
Medford



**From:** [Meaghan](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS  
**Date:** Friday, April 16, 2021 4:49:51 PM

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As a local resident of Stoneham 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.

I support this project - I believe the access to high quality medical care will endlessly benefit these communities and those beyond the immediate area. My parents are our main source of childcare. This type of facility will give both of them the access to MGB providers without interrupting their ability to be with our children.

I also realize the numerous employment opportunities that will come with this project, which will also benefit the community. This could be a draw for medical providers and staff to join us in the neighborhood. It could also bring career advancement for current members in the neighborhood.

If there is anything I can do as a member in a surrounding town, I would be happy to do the work to show my support.

Meaghan  
mwatson4@bwh.harvard.edu  
Stoneham

# STONEHAM

CHAMBER OF COMMERCE

April 16, 2021

To: The DoN Committee:

My name is Megan Day and I am the Executive Director of the Stoneham 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 under-served 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 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,



Megan Day  
Executive Director

**From:** [Megha Joshi](#)  
**To:** [DPH-DL - DoN Program](#)  
**Date:** Monday, March 29, 2021 6:14:00 PM

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Dear Madams and Sirs:

As a long term (30 yr ) resident of Winchester, and as a Physician working at Winchester Hospital, I want to to voice my strong **opposition against the Mass General Brigham outpatient center proposed for Woburn, MA for several reasons:**

- **WHY DO WE NEED ANOTHER FACILITY, WHEN WINCHSTER HOSPITAL IS DOING GREAT COMMUNITY SERVICE?**
- I delivered my daughter here, my girls were treated here, my father in law had surgery here. Winchester hospital has met all our needs: emergency and routine care. Its Breast care center is one of the best.
- 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,

Megha Joshi, M.D.

\_\_\_\_\_

Best,

*Nancy*

**Nancy Sachetti**  
**Executive Director**  
**Highland Healthcare Associates IPA**  
**12 Alfred Street, Suite 107**  
**Woburn, MA 01801**  
[REDACTED]  
**fax - 781-756-2946**  
[nsachetti@winhosp.org](mailto:nsachetti@winhosp.org)  
[nancy.l.sachetti@lahey.org](mailto:nancy.l.sachetti@lahey.org)



Reply

Reply all

Forward

April 14, 2021

To the DoN Committee:

Thank you for this opportunity to testify. As the executive director of a grassroots non-profit organization, 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 new services that are not needed. Feel free to contact me at [meih@chinesecultureconnection.org](mailto:meih@chinesecultureconnection.org) or [REDACTED] should you have any questions.

Sincerely,

*Mei Hung*

Mei Hung, Executive Director

**From:** [Melissa](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS  
**Date:** Thursday, March 25, 2021 11:18:55 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 his 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.

Melissa  
Woburn, MA 01801

**From:** [Meredith Bailey](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** Opposition to Mass General Brigham outpatient center proposed for Woburn, MA  
**Date:** Saturday, April 10, 2021 8:46:20 AM

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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.
- 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,

Meredith Anthony Bailey, MD.

---

## **Introduction**

- Good Morning, my name is Michael Croke. I appreciate the opportunity to voice my concerns with the Department of Public Health about Mass General Brigham's expansion plans and the intent to establish an outpatient center in the community of Woburn.
- I currently work as a Business Development Analyst at Shields Health Care Group, and have worked in various other roles throughout the company over the past four years. As a provider of both outpatient imaging and ambulatory surgery services, I am deeply concerned with Mass General Brigham's proposed expansion and the impact it will have on health equity and the cost of care.

## **Talking Points**

- I believe that Mass General Brigham's proposed expansion of imaging and ambulatory surgery services in Woburn will negatively impact local care and will increase the costs associated with services when compared to the current environment.
- A balanced payer mix allows local providers to deliver quality care to MassHealth patients. Healthcare systems' payer mixes will be disrupted as Mass General Brigham targets the commercially insured community in the region and siphons patients away from these local providers. The loss of revenue from commercial payers will negatively impact the financial stability of the local medical institutions that currently service the under-privileged and low-income residents, which will increase the disparity in access to health care services.
- Local providers will continue to serve those patients in need, although the loss of commercial revenue for providers will force them to raise their commercial rates to compete with Mass General Brigham, reduce the number of services being offered, or ultimately close down facilities serving the most vulnerable populations in the community.
- In addition to concerns about the impact on health equity and the cost of care, after a review of the DoN submitted by Mass General Brigham, the Woburn area is not medically underserved.
- With 39 DoN approved MRI units in or around the Woburn area, the approval of two additional units would be redundant.
- Since the Department of Public Health is still developing guidelines for defining primary service area, the approval of a project that raises such issues would set a dangerous precedent that threatens the future of community hospitals.

## **Conclusion**

- Finally, in order for the cost analysis to be truly independent, I am asking the Department to require that the Health Policy Commission conduct the independent cost analysis. Thank you for the opportunity to voice my concerns.



**From:** [Michael](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS  
**Date:** Saturday, April 03, 2021 11:31:43 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.

Michael  
mpdalton@verizon.net  
Winchester

**From:** [Michael](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS  
**Date:** Thursday, March 25, 2021 12:06:36 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 his 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.

Michael  
Stoneham

**From:** [MICHAEL](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS  
**Date:** Friday, April 16, 2021 4:15:44 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.

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.

MICHAEL  
MGG5@CORNELL.EDU  
MELROSE

**From:** [Michele Crage](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** Testimony - Mass General Brigham Incorporated – Multisite - 21012113-AS  
**Date:** Wednesday, April 14, 2021 8:19:49 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.**

April 14, 2021

Ms 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:

I am a nephrologist in Woburn, in private practice here for over 30 years. There are two other nephrologists in our group practice. Together we care for kidney patients at our Woburn office, and at Winchester Hospital, Encompass Rehabilitation Hospital in Woburn, and dialysis units in Woburn, Stoneham, and Medford.

Many of our patients have multiple chronic illnesses which require very complex and highly coordinated care. With respect to quality, timeliness, attentiveness, and compassion, our aim has always been to provide the highest level of service to our patients in their own local community. We have striven to remain independent so that we can continue to pursue these goals.

I am also the President of Highland Healthcare Associates IPA, an organization comprised of over 350 primary care and specialist physicians, most of whom practice in the Winchester service area. Our primary care doctors, all in private practice, care for over 55,000 patients covered by risk-based commercial insurance or in a Medicare Accountable Care Organization. For many years, we have worked to keep healthcare costs down by keeping care in outpatient settings, in the community, and off hospital license whenever medically appropriate, among other measures.

The IPA physicians are deeply concerned about the impact of MGB's planned expansion in Woburn on healthcare costs in the communities we serve.

The 2019 Health Policy Commission report noted that health care affordability is "a growing challenge" with premiums outstripping general price inflation and with employees bearing an ever-increasing share of the burden. The report states, "**health care spending growth in Massachusetts between 2016 and 2018 absorbed almost 40 cents of every additional dollar earned for families with coverage through employers, more than they took home in pay after taxes.**" The HPC noted that hospital outpatient services was the fastest growing health care spending category from 2017 to 2018, accounting for "60 percent of hospital spending for commercially-insured residents." They

attributed the growth in spending to patients' migration from lower-cost, high-quality local providers to higher-priced hospital-based outpatient facilities and recommended that **“policymakers should take action to require site-neutral payment for common ambulatory services and limit the cases in which both newly licensed and existing sites can bill as hospital outpatient departments.”**

The IPA believes that MGB's planned expansion into our community will inevitably divert outpatient services from low-cost private sites of service to very expensive MGB-affiliated hospital and outpatient sites for office visits, surgery, laboratory, radiology, and other ancillary services. As one example, the cost of a colonoscopy at a MGB facility is 5 times more expensive than in the freestanding endoscopy center in our community. Similar cost differentials will apply to outpatient surgery performed at the freestanding ambulatory surgery center in Medford vs the planned MGB ASC in Woburn. The Attorney General's office has well documented that no increase in quality is associated with the increased cost of such services. Furthermore, there is no evidence that there is any need for more healthcare services in our communities.

Because of the socialization of premium costs, the unnecessary additional costs that will come from MGB's proposed expansion will raise premiums for residents and businesses in the communities we serve. They will impede the IPA's continual efforts to reduce healthcare expenditures here and will threaten the continued availability of lower-cost services, promoting an ever-rising spiral of costs. This is in direct contradiction to the Commonwealth's goal of limiting the growth of healthcare costs.

The IPA respectfully requests that the DPH require the Health Policy Commission to conduct an analysis of the expected cost impact of the MGB expansion in Woburn, and that another public hearing be conducted after that report's findings are public.

Sincerely,

Michele A.  
Crage, MD

President, Highland Healthcare Associates IPA

**From:** [Michelle](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS  
**Date:** Saturday, April 03, 2021 11:23:21 AM

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

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

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

Michelle  
mdigregorio@partners.org  
Malden

**From:** [Mike](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS  
**Date:** Thursday, March 25, 2021 11:45:31 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 his 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.

Mike  
Woburn

**From:** [Mithun Nallari](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** Mass General Brigham Outpatient Center  
**Date:** Friday, April 16, 2021 1:04:52 PM

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Dear Madams and Sirs:

I am writing as a 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.
- 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,



Mithun S. Nallari MD, MPH

Woburn Medical Associates

23 Warren Avenue

Woburn MA 01801



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**From:** [NANCY](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS  
**Date:** Thursday, March 25, 2021 11:44:07 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 his 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.

NANCY  
Stoneham

**From:** [Nancy Landry, RN CEO](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** STOP this project to prevent escalation of healthcare costs, preserve private medical practice and protect community hospitals.  
**Date:** Monday, March 29, 2021 4:57:25 PM

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Dear Madams and Sirs:

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

- o 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.
- o 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.
- o 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.
- o 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.
- o 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.

Dear Madams and Sirs:

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

- o 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,

Nancy Landry, RN

Sincerely,

Nancy Landry, RN

**From:** [Nayomi Edirisinghe](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** MGB plans for an outpatient center in woburn, ma  
**Date:** Tuesday, March 30, 2021 3:16:04 PM

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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,

Nayomi Edirisinghe, MD FACS

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**From:** [Neil Gillis](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** Please support MGH Woburn Project  
**Date:** Thursday, April 15, 2021 12:01:14 PM

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Determination of Needs Program, DOH,

As a union carpenter and as a local resident, I am writing to express my support for the Mass General Brigham's project in Woburn. We need more access to care in our community – especially behavioral health, which this site will provide.

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

This project will allow many of our members in Woburn and surrounding communities to access high quality care in a state of the art facility closer to home

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

Sincerely,  
Neil Gillis  
26 beacon st apt56e  
Burlington, MA 01803

## **Introduction**

- Good Morning, my name is Nicholas Elia. I appreciate the opportunity to share some of my concerns with the Department of Public Health about MGB's expansion plans and intent to establish an outpatient center in the community of Woburn.
- I currently serve as a Sr. Business Development Analyst for Shields Health Care Group, where I have been working for the past 3 years. Given my affiliation with Shields, who offers both outpatient imaging and ambulatory surgery services, I have some serious concerns about how Mass General Brigham's proposed expansion in Woburn will impact health equity and the cost of care for patients in the community.

## **Lack of Demand for Imaging Services and Local Cost of Care**

- After a significant amount of review of the DoN submitted by Mass General Brigham, I believe there is insufficient demand for imaging and ambulatory surgery within the market to justify the proposed expansion of these services in Woburn.
- Looking at MRI specifically, there are currently 39 units with DoN approval located within and just outside of the Woburn primary service area. This would not be considered an underserved market for imaging services, and with around 30% of these units being operated by Mass General Brigham, this means that patients have ample opportunities to receive care within the Mass General Brigham network.
- In addition to this, the proposed expansion of imaging services in Woburn will have a negative impact on local care already provided, and will be more expensive than the existing services offered by these local providers.
- Mass General Brigham has a track record of pushing out community healthcare systems by targeting commercially-insured patients in the market, and pricing services at higher outpatient costs. If community providers lose a substantial number of commercial patients to Mass General Brigham, it will impede their financial viability by disrupting the balanced payer mix that enables them to deliver quality care to MassHealth patients, people living in poverty and patients affected by health inequities.
- I also wanted to raise a point in regards to the primary service area that was defined by Mass General Brigham for Woburn. The PSA defined for the proposed expansion coincides with zip codes listed in the Somerville MRI application. Given that these primary service areas overlap, I would ask that the independent cost analysis make sure that scan volume isn't being over counted.
- I would also like to point out that DPH is still developing guidelines for how to define proximate development by defining primary service area. Approving a project of this size without these finalized guidelines and a standard public comment process would set a dangerous precedent that threatens the future of community hospitals in the commonwealth.



## **Concluding Statement**

- Finally, in order to accurately understand the impact of this proposal, I'm suggesting the Department of Health require the Health Policy Commission to conduct the cost analysis to ensure a truly independent process, and schedule an additional public hearing for after this analysis has been completed. Thank you for your time and the opportunity to speak today.

**From:** [dr.kasdon\\_readingpediatrics.org](mailto:dr.kasdon_readingpediatrics.org)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** Mass General Brigham Expansion  
**Date:** Monday, March 29, 2021 8:46:09 PM

---

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Dear Madams and Sirs:

I am writing as a Lynnfield, MA resident and local pediatrician/pediatric practice owner 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 lower

cost, high value care for the patients and employers of the region.

Sincerely,

Nicholas S. Kasdon, MD FAAP

Sent from my Verizon, Samsung Galaxy smartphone

**From:** [Nicole](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS  
**Date:** Saturday, April 10, 2021 2:07:27 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.

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.

Nicole  
nbernier@gmail.com  
Weston

**From:** [Octavia Devon](#)  
**To:** [DPH-DL - DoN Program](#)  
**Subject:** The Vale in Woburn  
**Date:** Thursday, April 08, 2021 5:09:29 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.

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.
- 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,

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Octavia N. Devon, M.D., F.A.C.S.  
Lahey Institute of Urology  
Beth Israel Lahey Health

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