From: Samuel Gross

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

Subject: Opposition to Mass General Brigham Woburn facility

**Date:** Thursday, April 15, 2021 3:57:32 PM

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Hello-

I am writing as a physician working at Winchester Hospital and am opposed to the placement of the proposed Mass General Brigham facility in Woburn. Winchester Hospital already provides the majority of services that would be present, and also likely for lower cost. It has a long history with the community and is well-regarded. I am concerned that this placement would endanger a number of medical practices, including primary care providers and specialists, and also possibly the hospital itself. Community hospitals provide a valuable service to the surrounding residents, and this center would detract from that.

Regards,

Sam Gross, MD

PLEASE NOTE: This message is intended for the use of the person to whom it is addressed. It may contain information that is privileged, confidential and exempt from disclosure under applicable law. If you are not the intended recipient, your use of this message for any purpose is strictly prohibited. If you have received this communication in error, please delete the message and notify the sender so that we may correct our records. See our web page at http://www.lahey.org for a full directory of Lahey sites, staff, services and career opportunities.

From: <u>Sandra</u>

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

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

**Date:** Monday, April 05, 2021 8:59:41 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.

Good healthcare requires access. The Mass General Brigham provides the best possible healthcare in the Boston area. As a senior citizen transportation has become a problem. A local facility in Woburn would do much to alleviate this inconvenience.

In addition the jobs created both by construction and by healthcare workers would be a boon to the local community.

As a local Woburn resident and patient I support Mass General Brigham project. I ask the Department of Public Health to approve this application.

Sandra sdkirley@gmail.com Woburn From: Shannon

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

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

**Date:** Thursday, March 25, 2021 11:46:05 AM

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

As a local resident 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.

Shannon Wilmington From: Sharmila

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

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

**Date:** Tuesday, April 13, 2021 7:22:46 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.

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.

Sharmila sdorbala@bwh.harvard.edu Lexington My name is Sharon Burton. I am a resident of Melrose and work for the North Suburban WIC program which has an office in Cummings Park /Woburn. 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. I believe this multi-million dollar expansion would continue to have a massive negative impact on the cost of care and the ability for local community health care organizations to survive and continue to support local residents.

I have been the Community Outreach Coordinator for the North Suburban WIC Program for over 15 years. Prior to working at WIC, I was a Director of Human Resources for a major software company in Waltham. Over my 20 years as a Human Resources professional, I have watched MGB expand from a downtown teaching hospital to a massive regional healthcare provider. Over this time period MGB have expaended from one suburb to the next. First I watch them expand in Waltham and then onto Lexington. Eventually, I even watch as they built a huge facility north of Boston in Danvers (right across from Lahey's North Shore site). It seems like MGB is following the Amazon Model which is to expand everywhere and take over the healthcare market. I guess this would be acceptable if the end result was better healthcare (for the average person) at a more affordable price. Unfortunately, this has not happened. My understanding is that despite all the extra money we spend in Massachusetts in the end we achieve average results. The tech company I worked for eventually was purchased by a company in Texas. The first thing they did was move the health plan out of Massachusetts to avoid the "exorbant" costs of healthcare in Massachusetts.

I realize Massachusetts is known for having some of the best teaching hospitals in the country and I believe this to be true. However, in my experience most health care is somewhat "routine" and should not be provided by <u>expensive</u> teaching hospital. I believe we must leave the business of everyday "routine" healthcare to local providers if we have any chance of controlling cost. I feel that if we continue to allow MGB to expand at this rate we will never get a handle on healthcare cost in this state.

Sharon Burton
9 Garland Street
Melrose, MA 02176
Burtonsharon94@gmail.com

Formatted: Default Paragraph Font

 From:
 Imelville@rimand.com

 To:
 DPH-DL - DoN Program

 Subject:
 MGB-vale project

**Date:** Friday, April 16, 2021 3:24:23 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 a physician who owns a private practice in Wilmington, MA to voice my strong **opposition against** the Mass General Brigham/Vale outpatient center that has been 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. I do not believe that the **Determination of Need** has been met for this project.

Sincerely,

Sharon Stotsky, M.D.
Rheumatology and Internal Medicine Associates, PC
64C Concord Street
Wilmington, MA 01887

Fax: 978-988-9701

Email: sstotsky@rimamd.com

From: Sherri

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

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

**Date:** Wednesday, April 14, 2021 4:17:43 PM

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

As a local resident and Mass General Brigham employee, I believe our relationship with our patients is at the heart of the healthcare experience – for patients, their communities, care team members, and employees. Ensuring that all patients have convenient, affordable access to expert care is vital, which is why I support this project. I am looking forward to working with Woburn and the surrounding communities to ensure that Mass General Brigham uses our people, research, and technology to meet the needs of our patients.

Sherri safrank@bwh.harvard.edu Wakefield From: Sisilia

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

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

**Date:** Thursday, March 25, 2021 11:48:36 AM

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

As a local resident 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.

Sisilia Burlington From: Sohail Husain

To: DPH-DL - DoN Program

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

**Date:** Wednesday, March 31, 2021 6:08:48 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.

Hello. My name is Sohail Husain. I appreciate the opportunity to share my concerns with the Department of Public Health about the expansion plans of Mass General Brigham in Woburn.

I am an orthopedic surgeon at Agility Orthopedics. I have practiced out of our Stoneham office for the last 8 years. I work out of 2 hospitals in this community, Melrose Wakefield Hospital and Winchester Hospital. I grew up in the Boston suburbs. My father worked at MGH for over 25 years. I am very familiar with the medical environment in this area.

I am concerned about Mass General Brigham's proposed scope of expansion in this area. I think it will increase the cost of care in this community without adding value for routine care.

The size and market influence of Mass General Brigham will make it more difficult for insurers to negotiate. This will raise the cost of healthcare services, leading to higher costs for employers and patients in this community.

We have been working hard locally to provide excellent care at lower costs. We have recently opened a free standing ambulatory surgery center in Medford that provides excellent care at a fraction of the cost of a hospital-owned surgery center, which charges higher rates.

For about a year, I have been seeing ads in Orthopedic Journals looking for orthopedic surgeons to spend a portion of their time at MGH and a portion of their time developing a practice in the Boston suburbs. It seems clear that these surgeons will be taking their patients who need hospital-level care out of the

local community and into one of the most expensive hospitals in the state by establishing an MGB-affiliated pipeline referral system.

I appreciate having major academic centers 15 miles down the road to help treat complex problems that are beyond the scope of community care. A year ago I had a complex injury that no one in the area had experience in treating. I ended up having surgery at Mass General Hospital. I was able to go downtown for this unusual injury. That opportunity is already available for patients who need unusual specialty care. This expansion, however, will route people away from our community resources for routine care that is best done in and already offered by community hospitals, clinics and surgery centers.

I specifically request that the Department of Public Health require that the Health Policy Commission conduct the independent cost analysis to show us the full impact that building this facility in Woburn, MA will have on community care. I also request that additional public hearings be scheduled after the independent cost analysis has been conducted so the people of this community have a chance to participate in the decision making process in an informed manner.

Sincerely

Sohail Husain

Sohail Husain, MD Agility Orthopedics agilitydoctor.com From: Sonja

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

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

**Date:** Friday, April 09, 2021 2:24:49 PM

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

As a local resident, 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.

Sonja sonjaderrico5@gmail.com Stoneham From: <u>Subrata</u>

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

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

**Date:** Wednesday, April 14, 2021 3:50:00 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.

A healthcare center in Woburn will be very beneficial to my family. We would not have to go to Boston to see the providers for routine healthcare matters. It will also reduce out of pocket cost for us so that we can use in network facilities as much as possible. I feel that it will serve the communities in and around Woburn very well and allow access to high quality healthcare for a lot of the local residents.

Thank you, Subrata Das

Subrata sdas6@partners.org Stoneham





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

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

### Dear Ms. Szent-Gyorgyi:

Thank you for the opportunity to submit written testimony following MelroseWakefield Healthcare's comments at the Department of Public Health hearing 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.

MelroseWakefield Healthcare (MWHC) operates MelroseWakefield Hospital in Melrose and Lawrence Memorial Hospital in Medford. Our system serves many communities north of Boston, including Woburn. In fact, 51 percent of the visits at MelroseWakefield Healthcare come from patients who live in the expansive 18-town Woburn service area where MGB plans to expand its footprint: Andover, Arlington, Bedford, Billerica, Burlington, Hanscom AFB, Lexington, Medford, Melrose, North Reading, Reading, Stoneham, Tewksbury, Wakefield, Wilmington, Winchester, and Woburn.

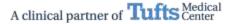
As discussed on March 25, we have significant concerns regarding MGB's application to establish an outpatient center in the community we are honored to serve with high-quality and high-value care. We believe these proposed projects could have catastrophic effects on local community hospitals and our patients. MGB's proposal is misaligned with the Commonwealth's goals to improve our health care ecosystem.

#### **Increased Cost of Care**

We are concerned the expansion of MGB ambulatory services into Woburn will increase the cost of care in our communities without increasing the quality of care for patients. Per the <u>Health Policy Commission's 2019 Cost Trends Report</u>, 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 <u>Center for Health Information and Analysis (CHIA) reported recently</u>, the cost of care in Massachusetts is continuing to rise and exceeded our state's cost growth benchmark in 2019. CHIA's data shows that outpatient hospital spending is a key driver of these skyrocketing costs.

In its Determination of Need (DoN) application, MGB claims these proposed new sites will lower patient costs because surgeries currently performed in its inpatient settings will shift to an ambulatory environment. Even if procedures performed in proposed MGB outpatient settings



are less costly within its own system, they are <u>significantly more expensive</u> than surgeries performed in existing community provider ambulatory settings. The <u>Health Policy Commission</u> <u>has also cautioned</u> 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 MelroseWakefield 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.

### **Health Equity**

While health equity is a leading concern for the Commonwealth, MGB's proposal will perpetuate and worsen health disparities across Massachusetts. Each of the proposed MGB outpatient sites are located in well-off, predominantly white communities. Every town listed in the Woburn service area is above the state 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 simply states that "the Proposed Project will increase access to the Clinical Services for all of the Applicant's patients." This response is inadequate, especially when paired with the fact that only 12.3 percent of MGB's statewide payor mix is Medicaid as compared to 19.1 percent at Wellforce. This claim warrants a request for further explanation and examination.

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

MGB's selection of affluent locations for its outpatient centers will result in greater disparities in payor mix should this project 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 center in Woburn could threaten to put providers who prioritize caring for MassHealth patients out of business. This expansion stands to only further perpetuate the need for more services for underserved communities, rather than truly increase access to medical services for *all* patients. As part of the review process, among our many health equity questions, we want to know how thoroughly MGB considered the demographics of Woburn as a site and how the location of the new facility will address or reduce existing health disparities for Black/African American and Hispanic/Latino residents -- this portion of the MGB application was under-addressed.

### **Duplication of Care without Demonstration of Need**

Woburn is a community well served by local providers. MGB's proposed Woburn site is two miles away from Winchester Hospital, 3.5 miles from MelroseWakefield Hospital, and five miles from Lawrence Memorial Hospital, which recently opened a low-cost ambulatory surgery

center. Multiple community providers are also available less than a mile away, including but not limited to Tufts Medical Center's Cancer Center, Agility Orthopedics, Excel Orthopaedics, and CHEM MRI Center.

Duplicating care without demonstrated need will substantially reduce the patient base and fiscal solvency of local practitioners, undercutting pre-existing quality care and threatening job loss among nurses, office administrators, and others within the local medical community.

Furthermore, MGB's proposal to offer MRI units at its proposed Woburn location is not adequately justified, as the market is already well supplied with a sufficient number of units given patient demand, including the MWHC site in Stoneham that has capacity. Adding more units would simply oversaturate the market and further increase total medical expense in the Commonwealth.

In light of this, we respectfully ask DPH to evaluate if and where there is market need, given that MGB was granted approval for the expansion of its existing clinic to a new satellite at Assembly Square in Somerville, with the addition of three MRI units. It is important to point out that there is an overlap in zip codes for the recently approved Somerville MRIs and the Woburn outpatient center.

If MGB's expansion plans are approved, MGB will have a total of 62 magnets within their system. The Applicant should provide utilization rates for all MRIs within its system and compare that to industry-defined benchmarks to determine if all these units are necessary.

Additionally, MGB has made no real commitment to transfer any of its higher-priced MRIs to lower-cost settings. Rather, they just keep adding new capacity. By contrast, when MWHC opened its new ASC, we closed our operating rooms to ensure the cost charged for surgeries and procedures in the ASC would remain up to 50 percent lower than the cost of the outpatient hospital surgery department.

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

Despite MGB's statements that they are shifting care from MGH and other locations to Woburn, their application asserts 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 makes no mention of decreasing square footage at MGH given the supposed shift of existing care – in fact, they are seeking DPH's approval of a \$1.9 billion patient room tower in downtown Boston.

We have serious doubt about the true intent of MGB shifting care, given that MGB has hired away three established, local primary care providers from MelroseWakefield Healthcare in the past six months to work in the Woburn service area – offering salary increases and again driving up costs.

There are concerns that MGB has not conducted an adequate, robust review of the physician market across service areas to determine the number of physicians needed in the market generally, as well as to identify specific community access needs when it comes to both primary care and subspecialist physicians. We are particularly keen on seeing more information on demand in the context of the Woburn market.

In addition to the disruption of payor mix among local health systems, we are concerned that MGB's recruitment of local practitioners away from community healthcare providers will undermine their profitability and capacity to provide critical healthcare services. 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. Patients that migrate to MGB will shift their care to the Commonwealth's most expense health system.

### **Antitrust and Consumer Protection**

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

MGB is already the most profitable healthcare system in the Commonwealth by 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 increase the size of MGB's patient panel and its ability to increase referrals within its own expensive system. Our local providers, employers and community members will end up paying the price.

### **Conclusion and Next Steps**

In its <u>2019 Cost Trends Report</u>, 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,

Sue Sandberg
President and CEO

MelroseWakefield Healthcare

Sue Sandberg

From: Sujatha Rajan

To: DPH-DL - DoN Program

Subject:STOP THE MGH PROJECT IN WOBURNDate:Wednesday, March 31, 2021 8:52:15 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 resident and as a self employed physician affiliated with Winchester Hospital to voice my strong **opposition against** the Mass General Brigham outpatient center proposed for Woburn, MA for several reasons:

- I am a proud member of a high quality patient centered specialty Urogynecology practice in Woburn. As a community physician I provided personalized care to my patients for over 12 years and have developed a long term bond with many of them. Please check out <a href="https://www.healthgrades.com/physician/dr-sujatha-rajan-xmxh7">https://www.healthgrades.com/physician/dr-sujatha-rajan-xmxh7</a> for patient reviews. This long term relationship is true of may specialists and PCP's in our community. Many specialists like myself in our community depend on referrals from local PCP's. The establishment of this center will shift patients to Partners/MGH PCP's who in turn will refer patients to their own specialists and not to us. This will restrict access to care for our patients, and funnel more services to MGH. I am very concerned this will threaten the sustainability of small practices like mine, destabilize the local market and restrict access to choice and care for our patients.
- In general larger hospital systems tend to have longer wait times for appointments, limit visits with doctors and push patients to mid level providers. I agree that NP and PA's provide valuable service, but direct physician care is preferred by patients. This proposed outpatient center restricts choice for patients in our community and this is undesirable.
- 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. The establishment of this center will poach patients from
  existing physicians and funnel them to Mass general. This risks the
  ability of small practices like me to stay in business.
- 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, and 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.
- 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 behemoth Mass General Brigham. Approval of this outpatient center could result in putting high value local 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, Sujatha

### Sujatha Rajan M.D.

New England Urogynecology P.C 800 W.Cummings Park | Suite 2550 | Woburn, MA 01801 | F 781-460-2123 | www.neugyn.com From: <u>Susan</u>

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

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

**Date:** Monday, March 29, 2021 8:33:24 AM

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

As a local resident 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.

Susan Stoneham From: Susan Bose Stempek
To: DPH-DL - DoN Program

**Subject:** Letter of Opposition - MGB Outpatient Center, Woburn

**Date:** Sunday, April 11, 2021 10:03:28 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 DPH Colleagues,

I am writing in strong opposition of the proposal for Mass General Brigham to plan and open an outpatient center at "The Vale" in Woburn.

I write from a few perspectives. One as a healthcare provider credentialed and privileged to provide care at Winchester Hospital. This is a high quality community hospital whose position will be severely threatened by this addition. With threat to the health of Winchester Hospital we could be removing inpatient beds needed in this region. There is not likely enough procedural demand to support both the MGB outpatient center and Winchester's ambulatory surgery site as well as its hospital practice. The losses to Winchester could be insurmountable, leaving Winchester unable to serve patients who need hospital and emergency care including its high quality Children's Emergency Department program. (My son has asthma and has directly benefited from this specialty care available in a suburb setting.)

Also, as you certainly know, Lahey Hospital & Medical Center does not provide Obstetrical Services. I delivered my son at Winchester. With a threat to Winchester Hospital's future, we also threaten access to a high quality community Obstetrics service line which would also raise statewide cost.

I genuinely believe that allowing MGB to move forward with this site will raise cost in the state as it would threaten, compromise and potentially cause closure of high quality community based programs already in place. MGB already has an outpatient center in Waltham which may provide additional local competition to Winchester anyway.

If we genuinely want to lower the cost of healthcare in our state (which is the right mission in my view), we should support all efforts toward highest quality care closest to home with both state and health system resources and not compromise community programs that work to serve many with this exact mission already being fulfilled in the process.

Thank you for considering my perspectives,

Susan Bose Stempek, MBA, MMSc, PA-C, FCCP, FCCM Medical ICU Physician Assistant

From: <u>suzanne</u>

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

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

**Date:** Thursday, March 25, 2021 11:20:35 AM

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

As a local resident 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.

suzanne Burlington From: syed

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

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

**Date:** Friday, April 16, 2021 4:42:40 PM

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

As a local resident, I do not support MassGeneral Brigham duplicating services offered by our local community hospital, Winchester. MGH and Brigham traditionally have had very high cost of care and would negatively impact the local physician practices. I am also concered about the increased traffic in the area and the lack of parking.

syed smq4242@gmail.com Lexington From: <u>Tara</u>

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

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

**Date:** Tuesday, April 13, 2021 7:27:26 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.

Tara taramcleanxo@gmail.com Burlington



Helene E. Feiler, MD

Arthroscopic Surgery Joint Replacement Surgery

David A. Alessandro, MD

Hand & Upper Extremity Shoulder Surgery Arthroscopic Surgery

Joseph J. Czarnecki, MD

Sports Medicine Arthroscopic Surgery Shoulder, Hip, Knee & Ankle

Michael N. Fehm, MD

Hip & Knee Replacement Surgery

Taylor A. Horst, MD

Hand & Upper Extremity Surgery

Peter S. Vezeridis, MD Shoulder Surgery Sports Medicine Arthroscopic Surgery

Josef B. Simon, MD Spine Surgery

Rajni Tanden, MD Physiatry

Lauren K. Szolomayer, MD Sports Medicine Arthroscopic Surgery Shoulder, Hip, Knee, Ankle

Adam J. Mandel, DO Foot & Ankle Surgery General Trauma

Grayson P. Connors, DO Hip & Knee Replacement Surgery

William C. Walsh, MD Orthopaedic Physician

Barry C. Dorn, MD Retired

Michael R. Spenard, PA-C Certified Physician Assistant

Michael P. Stempek, PA-C Certified Physician Assistant

Tiffany M. Moglia, PA-C Certified Physician Assistant

Ryan Cuerdon, PA-C Certified Physician Assistant

Nicole D. Mahoney, PA-C Certified Physician Assistant

Courtney O. Rohman, PA-C Certified Physician Assistant

## Excel Orthopaedic Center

200 Unicorn Park Drive Suite 201 Woburn, MA 01801 April 12, 2021

Massachusetts Department of Public Health

RE: Mass General Brigham Woburn Expansion Project

To Whom It May Concern:

I write to you today as a resident of Winchester and as a physician owner of Excel Orthopaedic Specialists in OPPOSITION of the Mass General Brigham Woburn expansion project. As an active participant in the local Winchester/Woburn community I can accurately state that the area has easy and effective access to healthcare with plenty of availability in the local community at lower cost and equal quality to that available through a MGB expansion project. I have several concerns that many have already addressed.

- 1. 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.
- 2. 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
- 4. 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

Additionally, Mass General Brigham currently has 3 centers all within 20 minute drive from the Woburn community (Waltham – 17 min; Danvers – 16 min; and MGH main campus 15 min). Current MGB patients already have easy access to care and this project would only further serve as a means for MGB to try and syphon patients from the well established, high quality, low cost care already present in the community.

Moreover, as a private practice who employs 125 medical assistants, therapists and administrators we fear that having a an entity like MGB literally between our office and the hospital at which we operate will have a negative impact on our patient volume, health care costs, and our ability to maintain a private practice in the community.

**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,

Taylor A. Horst, MD

Fax 781.782.1350

From: <u>Teresa</u>

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

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

**Date:** Thursday, March 25, 2021 11:47:04 AM

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

As a local resident 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.

Teresa tewksbury From: <u>Terrence</u>

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

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

**Date:** Friday, April 16, 2021 4:50:08 PM

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### To Whom it may concern:

I fully support the proposed MGB facility in Woburn as both an MGH patient and long time employee. I know first hand of the value that MGH brings to the communities it serves and witnessed that first hand as a primary care doctor at the MGH-Chelsea Health Center for over twenty-five years. Thank you for considering this project. T.O'Malley, M.D.

Terrence tomalley@mgh.harvard.edu Winchester

From: Tom

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

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

**Date:** Thursday, March 25, 2021 11:43:04 AM

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

As a local resident 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.

Tom Reading 
 From:
 Thomas Costello

 To:
 DPH-DL - DoN Program

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

**Date:** Saturday, April 10, 2021 2:11:10 PM

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

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

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

Dear Ms. Szent-Gyorgyi:

My name is Tom Costello and I am a private practice otolaryngologist with offices in Woburn and Winchester, and I live in Lexington. I have been practicing in the community for the past 16 years.

I am part of a small group single specialty practice that takes care of people of all ages - from birth to end of life. There are days that I have a one-day-old and a 100-year-old on my schedule. We are struggling to remain independent because we feel it is the best way to care for our community. We work diligently to meet the criteria of various large healthcare organizations in our area so that they will continue to include us in their networks. Our referral stream is not guaranteed by an employer, but rather is earned by being available, caring and offering a high value to our patients.

I am most concerned about MGB's planned expansion into this area because of the impact it will have on health care costs. Massachusetts Attorney General Maura Healey has repeatedly written about some of the underlying drivers of rising healthcare costs in Massachusetts.

In 2015, she wrote: "Market dysfunction persists, with continued cost and access consequences for consumers:

- 1. Price variation unexplained by quality persists, contributing to providers having different levels of resources to carry out their mission.
- 2. Across the state and within specific regions, higher priced providers continue to draw greater patient volume.
- 3. Projected growth in health care spending underscores the urgency of addressing market dysfunction. Given projected increases in pharmacy costs and utilization of health care services, to meet the state's cost growth benchmark, provider price increases will need to be limited. If the distribution of price increases follows historic patterns, provider price disparities will likely persist or worsen."

Attorney General Healey's words here are precise and intentional. The notion that price does not equate to quality, but that higher-priced providers like MGB continue to draw more patient volume away from high quality, lower cost providers indicates that more must be done to combat *perceived quality* for the sake of cost containment. We must apply this concept to MGB's current proposal. As

Attorney General Healey states, "providers [have] different levels of resources to carry out their mission"; local providers do not have the same resources as MGB, and their entrance into the Woburn market will accelerate the trend of higher priced providers attracting new patients, while the financial viability of safety net providers is threatened.

In 2016 the Attorney General wrote: "The key findings of our examination are the following:

- 1. In the commercial insurance market, we spend more on the health care of residents of higher income communities relative to their health burden than residents of lower income communities. This data is adjusted for health status, meaning the higher spending on affluent communities is not explained by greater health need.
- 2. Substantial spending differences exist within and between employer groups, and these differences are driven in part by members' provider choices.
- 3. Premiums as currently structured socialize not only the financial risk of getting sick, but also the higher costs of some members' use of high-priced providers. Socializing the costs of members' provider preferences dulls their incentives to seek out high quality, lower cost care incentives that market-based systems rely on to drive value.

This office and other state agencies have documented the fact that the Massachusetts health care market features wide payment differentials that are not explained by quality, patient complexity, or other common measures of consumer value. As the market transitions to alternative payment arrangements, these historic rate differentials are being "baked" into new global payment systems such that providers with fee-for-service rates that were significantly higher than those of competitors providing similar quality and complexity of services get higher annual budgets to spend on patient care going forward. Consequently, when a patient switches to a doctor that is affiliated with a different provider system, the amount allocated to his or her care may increase or decrease significantly merely because he or she has changed providers. Further, because providers are located in specific geographies and serve their local populations more health care resources may be accessible to residents of communities where the local providers have more favorable payment rates and can spend more on services regardless of patient need."

Again, as I read Maura Healey's deliberately chosen, well thought-out words, I cannot help but look at the MGB proposal for Woburn through this lens. If MGB were to migrate to this market, it is inevitable that more health care services would be delivered to this affluent area. Yet, there is not demonstrated health care need. Also, the payment inequities are "baked into" alternative payment models and therefore these models do not lower costs equally between systems. Finally, the idea that the "socialization" of premiums includes costs associated with patient choice of providers essentially guarantees that healthcare costs will rise for everyone in this community even if they choose not to use the MGB facilities.

My hope is that, by emphasizing some findings that have been public knowledge for years, the DPH will look critically at this proposal and question some of the assumptions put forth by MGB that they provide higher quality care than those in the community. Their entry into this market will reduce provider diversity and raise costs for everyone - not just those patients who choose to use MGB.

In closing, I respectfully request that the Department of Public Health require the applicant to hold

another public hearing on this application after the independent cost analysis has been conducted. Furthermore, 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.

Sincerely,

Tom Costello, MD

--

Thomas H. Costello, MD 100 Trade Center, #750 Woburn, MA 01801



April 14, 2021

LCS
400 Locust Street
Suite 820
Des Moines, IA 50309

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

To Whom it May Concern:

Just as Mass General Brigham has built a reputation for saving lives, we have built a reputation for improving them. Since 1971, LCS has been solely dedicated to serving the seniors who call our senior living communities home. We currently serve over 44,000 residents in over 130 senior living communities across 33 states with a goal of creating the best senior living experience possible. It is in that spirit that we write now to urge the Department of Public Health to approve the proposal for an ambulatory care site in Woburn.

As generations change, as do the needs of seniors. But one thing will always remain the same: people want affordable, quality healthcare at an affordable price. This healthcare center will offer just that for residents, thousands of whom are already Mass General Brigham patients.

With free parking and 24/7 care access, this site removes many barriers associated with access to care. The services being offered, ranging from primary care, to specialty services, to testing will bring care closer to home, all in one place.

LCS wants to create rich experiences for seniors. We intend to develop a community proximate to the proposed Mass General Brigham ambulatory care site in Woburn to do just that. It is in this light we fully support Mass General Brigham's application.

Sincerely,

<signature on file>

Tom Mathisen
Vice President / Director - Investments

Capital Square 400 Locust Street. Suite 820 Des Moines, Iowa 50309-2334



From: Szent-Gyorgyi, Lara (DPH)

To: Grace Yoon; Bhuiya, Nazmim (DPH); Cioffari-Macphee, Diana (DPH); Clarke, Lucy (DPH); Conover, Lynn (DPH)

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

**Date:** Friday, April 16, 2021 3:23:56 PM

Attachments: DoN – Mass General Brigham Incorporated – Multisite - 21012113-AS.pdf

image001.png image002.png image003.png image004.png

Check out the link below in light of the attached letter.

FYI: <u>Technology and Business Mixed Use Overlay District Project Filings - City of Woburn</u> (woburnma.gov)

Lara

From: Mathisen, Tom <mathisentom@lcsnet.com>

**Sent:** Thursday, April 15, 2021 6:11 PM

To: DPH-DL - DoN Program < DPH.DON@MassMail.State.MA.US>

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

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:

Please see the attached letter in support of the ambulatory care site in Woburn, MA proposed by Mass General Brigham. Thank you.

Tom Mathisen
VP / Director - Investments



LCSrealestate.com



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# Oral Testimony re: Mass General Brigham Determination of Need ("DoN") Application

### March 25, 2021

### INTRO:

- Good morning and thank you for the opportunity to speak today. My name Tom Shields and I am the Chief Executive Officer of Shields Health Care Group.
- Shields, through its joint venture partnerships with community hospitals like Melrose
  Wakefield and Winchester Hospital, serves multiple communities north of Boston,
  including Woburn.
- It is through these partnerships that Shields is able to provide high-value, high-quality patient care...which we do by working WITH local providers to enhance the services in those communities

### COST:

- I am deeply concerned about MGB's community expansion plans and how those plans will discredit the decade's long work of policy makers, elected officials and regulators to contain health care costs in the Commonwealth.
- If approved, this expansion <u>WILL</u> increase the cost of care for patients, employers and the Commonwealth as a whole....and that is why the HPC should be required to conduct an Independent Cost Analysis on this proposal the type of analysis it conducts for most other health care transactions in the Commonwealth.
- Countless reports have illustrated that MGB's market dominance provides it negotiating leverage over health insurers resulting in its ability to command higher reimbursement rates.
- Higher rates translate into higher prices for patients in the form our out of pocket spending.
- Price variation among health care providers is not something that's readily transparent to patients – resulting in patients unwittingly paying significantly more for the exact same service with no discernable difference in quality.
- In turn, employers that purchase insurance coverage on behalf of their employees also share in those increased costs.
- A simple example of provider price variation is an MRI provided by MGB can be upwards of \$500 more expensive than the same exact scan at a Shields location

- Local and safety net providers will also be immeasurably harmed by MGB's community expansion plans.
- MGB is targeting communities with high median-household income and greater commercially insured lives...drawing these patients away from lower cost local providers.
- Consequently, local providers will lose the revenue they rely on to fund the cost of providing care to lower-income, more medically complex and underserved populations.
- In order to remain financially viable, local providers will be forced to cut services and seek taxpayer bailouts.
- Though MGB claims it will lower the cost of patient care...what it fails to mention is that its comparing MGB rates to MGB rates rather than MGB rates to local provider rates
- For example, the Health Policy Commission in its 2019 cost trends report compared the price of an inpatient hysterectomy at a community hospital to the same procedure in an outpatient MGB setting
- Typically, moving a procedure from an inpatient to outpatient setting should reduce spending by roughly 25%
- **BUT** in this example found that spending <u>actually increased by 37%</u> by moving from an inpatient community hospital to an outpatient MGB site.
- It is also important to note that in 2016 MGB was denied plans to expand into this very same market for all the reasons I've mentioned.

### **CLOSING:**

- In closing, I would be remiss if I didn't say that the timing of this expansion feels particularly cruel and deliberate.
- <u>Local providers</u> are understandably focused on providing direct patient care to those afflicted with COVID-19 and those who may have deferred care as a result of the pandemic. It appears that MGB is making <u>THIS</u> their opportunity for a <u>market grab that we'll all wind up paying for.</u>
- Thank you and have a good day.

From: <u>Tracy Henry</u>

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

**Subject:** opposition against the proposed project **Date:** Monday, March 29, 2021 2:28:12 PM

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

Dear Madams and Sirs:

I am writing as a Woburn resident and Excel Orthopaedic Specialist employee 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 there are 7 surgeons who trained at MGB institutions, offering exceptional care, but at community hospital costs. The surgeons in our 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,

Tracy Henry

Lead Medical Secretary

Dr. Czarnecki, Dr. Fehm & Dr. Horst

F. 781-782-1350

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If you have received this transmission in error, please notify us immediately at info@excelortho.com.

From: <u>virginia hung</u>

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

Subject: RE: opposition to MGB outpatient center in Woburn, MA

**Date:** Tuesday, March 30, 2021 1:55:49 PM

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

Dear Madams and Sirs:

I am writing as a surgeon at Winchester Hospital and Hallmark Health 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. I had a C section at BWH 9 years ago and the hospital was paid \$33,000, approximately 4x what Winchester Hospital was paid for comparable services at that time.
- 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. Duplicating services leads to more disruption in health care delivery system! I have not heard from my patients that they have barriers to care. We refer appropriately to Lahey and Tufts for tertiary care services.
- 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. The outpatient surgery center at Winchester Hospital is underutilized. We are running 2-3 rooms there and there are 4 available. Hallmar Health/Shields just opened a brand new surgery center in Medford and it is using only a fraction of the planned capacity. Another outpatient surgery center would be truly redundant at this time.

 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.

### Virginia Hung, MD

Hand and Upper Extremity Surgery Plastic and Reconstructive Surgery Dexterity Surgical, LLC 100 Unicorn Park, Suite 102 Woburn, MA 01801

Fax. 781-721-5719

From: Wendy

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

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

**Date:** Thursday, March 25, 2021 11:20:03 AM

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

As a local resident 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.

Wendy Andover From: Wendy

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

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

**Date:** Friday, April 16, 2021 4:35:41 PM

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Subscribed more out of curiosity. 2023 is a long way off and I plan to move out of state before then. That said, I'm a single senior alone and going into Boston is not an option. I do need knee replacement and hear that MGH is the best place for it. Should I still be in the area, a local outlet would be ideal. I know Boston has the best medical care but not everyone has access to it.

Thank you.

Wendy junkmale18@comcast.net Wakefield From: Bill Faust

 To:
 DPH-DL - DoN Program

 Subject:
 Proposed MGH site in Woburn

 Date:
 Friday, April 16, 2021 12:54:14 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

I am writing as a Winchester Resident and Wichhester Hospital Employee to voice my strong opposition against the Mass General Brigham outpatient center proposed for Woburn, MA for several reasons:

- 1. This center will increase healthcare costs as MGH/Brigham has higher reimbursements than other health care systems
- 2. These services are already provided nearby via Winchetser Hospital and Melrose Wakefield Hospital and will create unnecessary duplication of services
- This center will endanger private medical practices where exceptional care is already provided by local providers at much lower cost compared to Mass General Brigham providers
- 4. And lastly this 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,

William C Faust, MD

From: <u>Marianne & Ernie</u>
To: <u>DPH-DL - DoN Program</u>

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

**Date:** Monday, April 12, 2021 3:51:56 PM

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

As a nearby Stoneham resident, we support Mass General Brigham's project in Woburn to provide closer to our home, about one mile away from the proposed Woburn facility, the healthcare we currently receive in Boston, Danvers, Waltham, Beverly. We need more access to the level of care in our community as provided by the other locations – especially behavioral health, which this site will provide.

We have found that currently we have to wait on many occasions more time than we believe to be appropriate to receive services such as CT scans, x-Rays, MRI's etc.

We are now in our 70's and still able to get to the other locations but it seems appropriate for our well-being to be able to conveniently receive MGB services without waiting in traffic on I-93 or Rte. 128 should we have to go in during rush hours.

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

Marianne & Dernie mwronka@wronkaltd.com Stoneham