

February 20, 2020

Via Email and Hand Delivery – Return Receipt Requested

Margo Michaels, MPH  
Director, Determination of Need Program  
Department of Public Health  
250 Washington Street  
Boston, MA 02108

**BARRETT  
& SINGAL**

Re: Partners HealthCare System, Inc.  
Determination of Need Application # PHS-19092711-HE  
Substantial Capital Expenditure and Substantial Change in Service – Newton-  
Wellesley Hospital

Dear Ms. Michaels:

We write on behalf of Partners HealthCare System, Inc. ("Applicant") to thank the Department of Public Health ("Department") for its diligence in reviewing the above-captioned Determination of Need ("DoN") Application related to a substantial capital expenditure and change in service by Newton-Wellesley Hospital ("NWH"). Pursuant to 105 CMR 100.510(C), the Applicant submits the following written comments with respect to certain of the proposed conditions contained in the Department's Staff Report to the Public Health Council (the "Staff Report"). We offer the following comments.

Conditions 1 and 2 require the Applicant to report the total participants in programs designed to increase CRC screening or rescreening for its Patient Panel and any other programs or initiatives designed to reduce risk factors for CRCs in the broader community. The Applicant is able to report on the total number of participants in such programs; however, the Applicant does not track race and ethnicity of all participants and believes that this will prove challenging given the nature of some of the initiatives. For example, when NWH hosts health fairs and other educational initiatives for both its Patient Panel and the general public, staff do not have a mechanism for inquiring about race and ethnicity of participants as these are educational forums. Accordingly, NWH requests that data on race and ethnicity of participants be removed from the condition.

With respect to Attachment 1: Required Measures for Annual Reporting, we offer the following comments:

- Observation Unit measure #8 Length of Stay: We suggest that the language in 8a) should read: *Length of Stay for Patients in the Observation Unit* and the reference to ED patients should be struck from the measure as once these patients are moved to the observation unit, they are no longer an ED patient.
- Special Care Nursery measure #14: The Applicant requests that the language of the metric be changed to read: *The number of (nonlevel III) neonates at NWH that have to be transferred to other facilities for care.*

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- Cardiac CT measure #19 requires the Holder to report on the number of elective diagnostic cardiac catheterization procedures performed at other hospitals. NWH does not have access to this information for all hospitals as a patient may elect to have the procedure outside of MGH or BWH. As an alternative, the Applicant proposes the following measure: *The absolute number of cardiac CTs performed at NWH that do not show obstructive coronary disease*. This measure will allow the Department to understand the utility of this modality.

The Applicant appreciates your consideration of the proposed changes. Please contact Crystal Bloom, Esq. or me if you have any questions regarding this letter and our proposed changes.

Sincerely,



Andrew S. Levine

cc: DPH DoN  
L. Clarke  
R. Rodman, Esq.  
AG ([hcd-don-filings@state.ma.us](mailto:hcd-don-filings@state.ma.us))  
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