

January 23, 2020

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& SINGAL**

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

Re: Partners HealthCare System, Inc.  
Determination of Need Application # PHS-19093011-HS  
Change in Service to Add Three 3T MRIs at MGPO Assembly Row

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 change in service by the Massachusetts General Physicians Organization, Inc. ("MGPO"). We appreciate the efforts of the Department's staff to conduct a thoughtful analysis of the potential effects of the proposed project. Pursuant to 105 CMR 100.510(C), we write to submit written comments on behalf of the Applicant regarding certain of the proposed conditions contained in the Department's Staff Report to the Public Health Council (the "Staff Report") for the above-captioned DoN Application. We offer the following comments.

With respect to Condition 5 regarding the DoN – Community Health Initiative ("CHI"), the breakdown of funding found on page 25 of the Staff Report does not provide for the requested evaluation monies. Therefore, the Applicant requests that, as with other DoN approvals, the Department allow the Applicant to utilize CHI funds to carry out the evaluation requirements of the CHI process by reducing the total amount that is distributed to local approaches. This request was made in the DoN Application consistent with the Department's past practice with respect to evaluation funding. Accordingly, the Applicant requests that of the \$545,027.48 designated for local approaches, \$54,502.75 may be used for evaluation purposes, including technical assistance and appropriate evaluation of CHI-funded projects, leaving \$490,524.73 for distribution to local approaches.

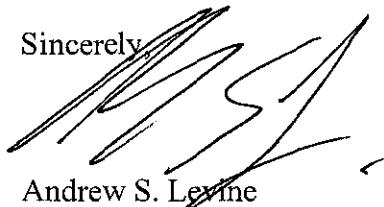
The Applicant appreciates your consideration of our suggested modifications to certain of the proposed conditions in the Staff Report as explained above. Please contact Crystal Bloom, Esq. or

Margo Michaels, MPH  
Director, Determination of Need Program  
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January 23, 2020  
Page 2

BARRETT  
& SINGAL

me if you have any questions regarding this letter and our proposed changes. We would also make ourselves available to meet with you to discuss the proposed changes prior to the Public Health Council meeting on February 12, 2020.

Sincerely,



Andrew S. Levine

cc: DPH DoN  
L. Conover  
R. Rodman, Esq.  
AG ([hcd-don-filings@state.ma.us](mailto:hcd-don-filings@state.ma.us))  
CHIA ([hcf.data2@state.ma.us](mailto:hcf.data2@state.ma.us))  
HPC ([hpc-dph.filings@state.ma.us](mailto:hpc-dph.filings@state.ma.us))  
D. Garbarino ([david.garbarino@state.ma.us](mailto:david.garbarino@state.ma.us))  
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