

April X, 2025

Dennis Renaud, Director, Determination of Need Program Massachusetts Department of Public Health 67 Forest St., Marlborough, MA 01752 DPH.DON@massmail.state.ma.us

Re: Public Comment in Support of Determination of Need Application UMMH-25021208-HE

Dear Mr. Renaud,

My name is Rebecca Kuczarski, and I serve as the Executive Director of Why Me & Sherry's House, a Worcester-based nonprofit that provides comprehensive support to families of children with pediatric cancer. Every day, we walk alongside families as they navigate some of the most difficult moments of their lives—when their child is diagnosed, throughout treatment, and often through the long and painful journey of survivorship or grief.

I'm writing today in strong support of UMass Memorial Health's effort to bring Proton Therapy to the UMass Memorial Medical Center Cancer Center at Marlborough Hospital. This is not just a technological advancement, it is an opportunity to preserve family bonds and give children the best possible chance to heal with dignity, comfort, and connection.

Families in Central Massachusetts often begin their cancer care journey at UMass Memorial Medical Center in Worcester, but when a child requires specialized care, like Proton Therapy, they're sent to Boston for daily treatments. The subsequent travel adds more than just hours on the road. It separates families, stretches thin financial resources, and piles stress onto an already unbearable situation.

I've witnessed marriages strain or even break apart because of the immense pressures involved in seeking care far from home. I've seen siblings develop anxiety because their lives are turned upside down, their routines shattered. When pediatric cancer patients are able to come home, eat dinner with their families, and sleep in their own beds during treatment, it changes everything by supporting healing and instilling hope in a return to normalcy.

In 2011, my daughter Sophia was diagnosed with Acute Lymphoblastic Leukemia at UMass Memorial Medical Center. We made the decision to keep her treatment in Worcester so we could remain together as a family with our two other children. For us, the emotional and psychological stability of staying close to home was a critical part of her care.

Pediatric cancer treatment also faces significant gaps in funding and innovation. Children are often treated with decades-old therapies developed for adult patients, resulting in significant side effects and long-term health challenges. My own daughter lost her life not to cancer, but to the devastating effects of the treatment itself even after achieving remission. Proton therapy offers a specialized, more precise form of treatment, which is especially important for reducing side effects and improving quality of life in children.

Unfortunately, very few children are able to access this specialized care. Many families are forced to make impossible choices or forgo the best care because they simply cannot access it. Having Proton Therapy available in Marlborough would not only bring care closer to home, but it would also expand access to those who need it most.

This is about equity, humanity, and giving every child the best possible shot, not just at surviving, but at living a full life beyond cancer. I urge you to approve the addition of a Proton Therapy Service at the UMass Memorial Medical Center Cancer Center in Marlborough. It will make an extraordinary difference in the lives of countless families, and it's a step toward a more compassionate, accessible, and effective cancer care system in Massachusetts.

Rebecca Kuczarski

With my deepest gratitude, **Rebecca Kuczarski** Executive Director Why Me & Sherry's House



December 10th, 2024

Department of Public Health

Commonwealth of Massachusetts Determination of Need Program 67 Forest Street Marlborough, MA 01752 617-624-5690 DPH.DON@State.MA.US

Dear Members of the Massachusetts Determination of Need Program,

On behalf of the National Association for Proton Therapy (NAPT), I am writing to express support for increased capacity for proton therapy in Massachusetts. As a leading organization dedicated to the advancement and accessibility of proton therapy, we believe cancer patients in Massachusetts should have access to the most advanced types of cancer treatments such as proton therapy.

NAPT is an independent nonprofit organization founded in 1990 whose mission is to work collaboratively to educate and raise awareness of the clinical benefits of proton therapy among patients, providers, payers, policymakers, and other stakeholders, ensure patient choice and access to affordable proton therapy, and encourage cooperative research and innovation to advance the appropriate and cost-effective utilization of proton therapy for certain cancers. Our members are world-renowned cancer centers, many of which are National Cancer Institute (NCI) designated comprehensive cancer centers and National Comprehensive Care Network (NCCN)® members¹.

Proton therapy is a radiation treatment modality that has the proven ability to reduce side effects for patients by limiting the amount of normal tissue exposed to radiation. Unlike conventional x-ray radiation, which has both entrance and exit doses, proton therapy delivers radiation to the target, with little to no radiation extending beyond the target. In addition to these acute and late toxicity benefits of proton therapy over conventional radiation therapy, proton beam therapy has been shown across multiple disease sites to improve overall survival, either by reducing life-threatening toxicities, being more biologically potent at tumor killing, or allowing for more targeted and escalated doses of radiation to be delivered directly to the tumor.

Over the years, there has been substantial evidence-based research demonstrating the effectiveness of proton beam therapy in treating various malignancies, leading to its acceptance as a critical component of comprehensive cancer care for certain types of cancer. Proton therapy is particularly beneficial and the preferred treatment for children because of its precision in targeting tumors while sparing surrounding healthy tissues. Minimizing toxicity reduces secondary cancer risks,





reduces both acute and chronic side effects, and supports better long-term health and quality of life into adulthood². In adult patients, proton therapy has shown significant benefits across several types of cancer including head and neck cancers, central nervous tumors, cancers of the gastrointestinal among others. For example, preliminary findings from randomized trials highlight its ability to reduce treatment-related toxicity in head and neck cancers, leading to fewer side effects, shorter recovery times, and preserved quality of life during and after treatment³. Additionally, when combined with chemotherapy, proton therapy can significantly decrease severe side effects compared to conventional radiation therapy, reducing hospitalizations and improving overall treatment tolerability⁴.

The indications for proton therapy use are continually expanding, as shown in NAPT's recent 10-year analysis published in the Red Journal, which provides support of its increasing relevance across a range of cancers⁵. Additionally, the American Society for Radiation Oncology (ASTRO) model policy for proton beam therapy⁶ was recently updated, underscoring the growing clinical consensus around proton therapy's value for a broader range of indications and establishing support for its inclusion as a treatment option across radiation oncology practices.

A particularly promising area of growth is the use of proton therapy for re-irradiation. The number of re-irradiation patients receiving proton therapy increased by more than 25% from 2021 to 2022. Patients who require re-irradiation often face elevated risks of severe side effects with conventional radiation therapy, given the cumulative impact on healthy tissue. Traditional radiation therapy is often limited in re-irradiation scenarios due to the cumulative dose that normal tissues can tolerate. Proton therapy minimizes the dose "spillover" to healthy tissues, allowing clinicians to safely treat areas that might otherwise exceed safe radiation limits. Proton therapy's precision enables safer re-irradiation treatment by minimizing radiation exposure to previously treated areas. As a result, proton therapy offers these patients a treatment path that can reduce toxicity and improve quality of life, making it an invaluable option for a growing population of patients.

Currently, less than 9% of patients who would benefit from proton therapy have access to it, often due to geographic and logistical barriers⁸. Introducing proton therapy in more areas will be instrumental in improving access to this life-saving treatment for Massachusetts residents. Expanding proton therapy will reduce the financial and emotional burden on patients and their families who would otherwise need to travel long distances for treatment. This step supports Massachusetts' commitment to improving healthcare access and reducing disparities in cancer care, ensuring that more residents across the state can receive timely, effective treatment. Proton therapy can improve disease outcomes, reduce radiation toxicity, and improve quality of life for patients with cancer.





In line with our mission of increasing patient choice and access, NAPT supports the expansion of proton therapy capacity in Massachusetts to ensure broader patient access to this essential treatment and encourages the Department of Public Health to consider the importance of increased availability statewide.

Thank you for considering this letter of support. Please feel free to reach out to NAPT for any additional information or collaboration on this important initiative.

Sincerely,

Jennifer Maggiore Executive Director

National Association for Proton Therapy (NAPT)

lennée Mogsiere

202-919-5554

jennifer@proton-therapy.org www.proton-therapy.org

1 https://proton-therapy.org/findacenter/

- 2 Kahalley LS, Peterson R, Ris MD, et al. Superior Intellectual Outcomes After Proton Radiotherapy Compared With Photon Radiotherapy for Pediatric Medulloblastoma. J Clin Oncol. 2020;38(5):454-461. doi: 10.1200/JCO.19.01706
- $3\ \underline{https://www.mdanderson.org/newsroom/asco--proton-therapy-demonstrates-advantages-in-phase-iii-head-a.h00-159698334.html$
- 4 Baumann BC, Mitra N, Harton JG, et al. Comparative Effectiveness of Proton vs Photon Therapy as Part of Concurrent Chemoradiotherapy for Locally Advanced Cancer. JAMA Oncol. 2020;6(2):237-246. doi: 10.1001/jamaoncol.2019.4889
- 5 Hartsell WF, Simone CB II, Godes D, et al. Temporal Evolution and Diagnostic Diversification of Patients Receiving Proton Therapy in the United States: A Ten-Year Trend Analysis (2012 to 2021) From the National Association for Proton Therapy. Int J Radiat Oncol Biol Phys. 2024;1 19(4): 1069-1077. doi: 10.1016/jijrobp 2023.12.041





6 https://www.astro.org/ASTRO/media/ASTRO/Daily%20Practice/PDFs/ASTROPBTModelPolicy.pdf

7, 8 https://proton-therapy.org/resource-item/2023-napt-member-survey-executive-summary/



April 21, 2025

Mr. Renaud, Director Determination of Need Program Massachusetts Department of Public Health 67 Forest Street, Marlborough, MA 01752

Dear Mr. Renaud:

My name is Jeff Valois, and I'm a brain cancer survivor. At age 36, I was diagnosed with a medulloblastoma - a cancer typically seen in children, very rarely in adults. Thankfully, I had the opportunity to undergo proton therapy at Massachusetts General Hospital in Boston. Today, I'm sharing my story to advocate for expanded access to proton therapy in Massachusetts

The Benefits of Proton Therapy

Proton therapy was a critical part of my treatment, and I'm so thankful it was available to me. It allowed for the precise targeting of my tumor while sparing healthy tissue. This is especially important in brain cancer, where damage to surrounding areas can have lifelong complications.

Today, five years post-treatment, I'm doing well. I'm back at work; I spend time with my family; I play golf (too much, according to my wife); and I'm able to live a normal life. I suffer lingering effects on my energy and strength, but I know things could have been so much worse without access to proton therapy. I've connected online with other medulloblastoma survivors who didn't have the same treatment options and now struggle with walking, driving, and basic daily activities. I don't take my outcome for granted.

The Challenge of Access

But getting proton therapy wasn't easy. I live in West Boylston, just outside Worcester, about an hour from Boston. My treatment plan required that I be at Mass General Monday-Friday for six weeks. I couldn't drive. My wife was working full-time and caring for our two-year-old son. We couldn't afford a long-term stay in Boston. So my wife and a close friend organized a network of drivers to get me there and back, day after day.

When scheduling and managing daily rides to and from Boston became challenging a week or so into my sixweek stint, another friend - my boss, actually - stepped in and arranged rides for the duration of my treatment.

I don't know how we would've managed those daily commutes if not for that incredible gesture. I was lucky. Most people in Central or Western Massachusetts wouldn't have had that same opportunity.

The Need for Greater Access

That's why I'm speaking out today. Cancer is hard enough for patients and their support systems. Patients shouldn't have to add multi-hour daily commutes or financial stress to get the best care. Expanding access to proton therapy beyond Boston is essential. The proposed proton center at UMass Memorial Health in Marlborough would be a game-changer for people like me and for those who don't have a village to lean on. But it requires the state's approval. I urge regulators to support the determination of need application and give more patients the opportunity for this life-changing care.

Conclusion

My strength and energy will never be 100%, but I'm here. I'm with my family; I can do the things I love; and I have a life I value deeply, thanks largely to proton therapy. Please help ensure others across Massachusetts can say the same, without having to factor their ability to get there into their decision to pursue the best treatment available.

Thank you for reading and for your consideration to increase access to proton therapy.

Jeff Valois



The Commonwealth of Massachusetts HOUSE OF REPRESENTATIVES STATE HOUSE, BOSTON 02133-1054

Committees:
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and Regulatory Oversight
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STATE HOUSE, ROOM 167 TEL. (617) 722-2810 Hannah.Kane@MAhouse.gov

April 22, 2025

Determination of Need Program Massachusetts Department of Public Health 67 Forest Street Marlborough, MA 01752

Re: UMMH-25021208-HE

To whom it may concern,

I write to express my support for UMass Memorial Health's proposal to bring proton therapy to the UMass Memorial Medical Center Cancer Center at Marlborough Hospital. This will make cutting-edge treatment more accessible to Central Massachusetts residents, enhance medical innovation, and support economic development in the region.

Proton therapy reduces potential damage to healthy tissue, improving health outcomes and quality of life, and is especially effective in treating pediatric cancer. Currently, Massachusetts General Hospital has two proton therapy units, and is the only hospital in New England offering proton therapy. Cancer patients living in Central and Western Massachusetts face challenges accessing this treatment due to the time and expense of traveling to Boston daily, and as cancer diagnoses continue to increase, two units will not be sufficient to provide proton therapy to all patients who could benefit.

A proton therapy unit at the Cancer Center will allow more patients to receive lifesaving care and improve health outcomes, particularly for low-income, rural, and elderly patients who are not able to go to Boston for daily treatment. This unit will also support local innovation and potential research partnerships in Central Massachusetts, and create local jobs in cancer care. UMass Memorial Health is a leader in advanced cancer care, and offering proton therapy will build upon the successful partnership between the Cancer Center and Marlborough Hospital to improve health equity and support the regional economy.

Thank you for your attention to this matter. If you require any further information or assistance, please do not hesitate to contact me at Hannah.Kane@mahouse.gov.

Sincerely,

Hannah Kane

State Representative
11th Worcester District
State House, Room 167

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617-722-2810



The Commonwealth of Massachusetts

House of Representatives State House, Noston 02133-1054

> Vice Chair Joint Committee on Higher Education

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Municipalities and Regional Government State Administration and Regulatory Oversight Aging and Independence

STATE HOUSE, ROOM 167 TEL. (617) 722-2810 Carmine.Gentile@MAhouse.gov

April 17, 2025

Determination of Need Program

Massachusetts Department of Public Health
67 Forest Street

Marlborough, MA 01752

RE: Public Comment regarding UMMH-25021208-HE

To whom it may concern,

I am writing to express my strong support for UMMH's proposal to bring Proton Therapy to the Cancer Center at Marlborough. As the State Representative for the 13th Middlesex District, I am proud to represent the communities of Sudbury, Concord, Wayland, Marlborough, and Lincoln in the Massachusetts House of Representatives. The expansion of proton therapy into Marlborough is a necessary step to ensure patients in MetroWest, Central Massachusetts, and across the Commonwealth as a whole, have equitable access to world-class cancer treatment.

As the largest health care provider and employer in Central Massachusetts, serving over 430,000 patients annually, UMMH's commitment to our community is clear. Nearly 70 percent of its patients are covered by Medicare or Medicaid, emphasizing the health system's vital role as a safety net provider.

Proton therapy service would build upon a strong foundation already established at the UMass Memorial Cancer Center in Marlborough, a facility that has excelled in delivering high-quality care since its opening in 2013. The Cancer Center's existing linear accelerator and CT simulator technology, in conjunction with its systemwide electronic health record integration and Dana-Farber Cancer Care Collaborative affiliation, have made it a standout institution in the region.

Proton therapy represents one of the most advanced cancer treatment options available today. By delivering targeted radiation with minimal impact on healthy tissue, it significantly reduces treatment side effects and improves patients' quality of life—especially in pediatric cases. However, this treatment remains out of reach for too many residents in Central and Western Massachusetts. Currently, only two proton therapy units exist in New England, both located at Massachusetts General Hospital in Boston. The lack of regional access imposes severe financial and logistical burdens on patients and families, from travel and lodging costs to parking and time off work.

For many, especially those with limited incomes, transportation constraints, or caregiving responsibilities, traveling to Boston on a daily basis for weeks of proton therapy is simply not feasible. This geographic disparity creates a profound health equity issue—one that this proposal directly addresses. By bringing proton therapy closer to home, UMMH will ensure that residents throughout the region, regardless of socioeconomic status, can receive the lifesaving care they need.

Furthermore, this proposal will not only expand access—it will also advance Massachusetts' leadership in health care innovation and economic development. By acquiring equipment from Mevion Medical Systems, a Littleton-based manufacturer and the only domestic producer of proton therapy systems, UMMH's investment will bolster a local industry leader and help cultivate a regional hub for medical technology and research.

Lastly, I want to underscore the long-term cost effectiveness of this initiative. Proton therapy has been associated with reduced complications, hospitalizations, and secondary cancers, potentially resulting in significant downstream savings for both patients and the health care system. By shifting care away from overburdened urban centers and into high-performing regional institutions like the Marlborough Cancer Center, we can improve efficiency, lower out-of-pocket costs, and better serve our communities.

Sincerely,

Carmine L. Gentile State Representative

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13th Middlesex District



The Commonwealth of Massachusetts

HOUSE OF REPRESENTATIVES STATE HOUSE, BOSTON 02133-1054

DIVISION CHAIR

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REPRESENTING THE PEOPLE OF THE 4TH MIDDLESEX DISTRICT

April 23, 2025

Mr. Dennis Renaud Program Director, Determination of Need Program Massachusetts Department of Public Health **67 Forest Street** Marlborough, MA 01752

RE: Support for bringing Proton Therapy to the Cancer Center at Marlborough UMMH-25021208-HE

Dear Director Renaud:

As the State Representative for Marlborough, I am writing to offer my strong and unequivocal support for UMass Memorial Health's proposal to bring Proton Therapy to the Cancer Center at Marlborough Hospital.

This initiative represents a major advancement for health care access in Massachusetts. Proton Therapy is a highly effective, precision-based cancer treatment that can significantly improve patient outcomes, particularly for children and individuals with complex or sensitive tumors. Yet, despite its promise, access to this treatment remains limited in our state—with only two proton therapy units currently operating at Massachusetts General Hospital. The need for expanded capacity is real and urgent.

Bringing Proton Therapy to Marlborough will relieve this burden and ensure that patients in our region can access life-saving care close to home. For too long, residents of Central Massachusetts have faced financial and logistical barriers to receiving this specialized treatment, often traveling hours each day to Boston or beyond. This proposal corrects that inequity and brings world-class care to the communities that need it most.

The benefits of this project go beyond health outcomes. The investment in Proton Therapy at Marlborough Hospital also supports local economic development through job creation, medical innovation, and a strengthened partnership with Mevion Medical Systems, a Central Massachusetts-based company and North America's only manufacturer of proton therapy systems. It positions Marlborough as a hub for advanced cancer care and solidifies Massachusetts' leadership in cutting-edge medical technology.

From a policy perspective, this project supports our shared goals of health equity, cost-effective care delivery, and local innovation. UMass Memorial Health's outpatient pricing structure, proven clinical leadership, and deep commitment to underserved populations make this proposal both sustainable and essential.

As the representative of this community, I see firsthand the impact this would have on my constituents. Given UMass Memorial Cancer Center at Marlborough Hospital's successful track record, I fully support bringing Proton Therapy to Marlborough. Please don't hesitate to contact my office with any questions.

Sincerely,

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State Representative

140 Main Street Marlborough, MA 01752 (508) 460-3770 Mayor@marlborough-ma.gov

April 22, 2025

Dennis Renaud, Director, Determination of Need Program Massachusetts Department of Public Health 67 Forest St., Marlborough, MA 01752 DPH.DON@massmail.state.ma.us

Re: Public Comment in Support of Determination of Need Application UMMH-25021208-HE

Dear Director Renaud.

As the Mayor and a fifth-generation resident of Marlborough, Massachusetts, I am proud to support UMass Memorial Health's Determination of Need Application UMMH-25021208-HE to develop a Proton Therapy Service at the UMass Memorial Medical Cancer Center in Marlborough.

Marlborough Hospital and the UMass Memorial Health system play a vital role in supporting the health of our community. Our residents have trusted Marlborough Hospital to provide high-quality, affordable, and equitable care for over 135 years. The Cancer Center at Marlborough has also become a regional leader in radiation oncology and other cutting-edge cancer care services, serving as a tremendous asset to our community.

UMass Memorial Health's plan to develop a proton therapy service is a prime example of how the system intends to invest in and expand access to world-class, innovative care in our region and city. As I have been made aware, the precise nature of proton therapy can reduce potential damage to healthy tissue in the body, the amount of radiation needed, and side effects from cancer treatment. This technology is particularly effective in treating pediatric cancer. All patients across Central Massachusetts, deserve access to treatment options that offer improved health outcomes and a better quality of life.

Investing in the Cancer Center will allow it to flourish as a local innovation hub that promotes medical innovation, new cancer research partnerships, and the creation of jobs in the cancer space. UMass Memorial Health plans to acquire its proton therapy machine from a Littleton-based company, Mevion Medical Systems, supporting a state-of-the-art manufacturer located in Central Massachusetts.

This proposal is also a matter of improving equity and access to lifesaving care across the state, especially for underserved patients. Currently, proton therapy is only available in New England at Massachusetts General Hospital in Boston. For any patients living outside of Greater Boston, this creates a significant financial burden and the added stress during daily treatment. These burdens are often challenging for patients in Central and Western Massachusetts.

Making proton therapy available to patients in Central Massachusetts and across New England is not just about enhancing health outcomes and innovation, it's about improving health equity by ensuring all patients have local access to cutting-edge cancer treatment without significant delays or travel barriers.

For these reasons, I fully support UMass Memorial Health's Determination of Need Application. Thank you for your ongoing attention to this process.

Sincerely,

J. Christian Dumais,

Mayor