



April 24, 2025

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

RE: Determination of Need Application #UMMH-25021208-HE – UMass Memorial Health / Marlborough Hospital Merger and Proton Therapy Expansion

Dear Mr. Renaud, Director of the Determination of Need Program:

As President and CEO of Mevion Medical Systems, I write to express Mevion's enthusiastic support for UMass Memorial Health's Determination of Need application (#UMMH-25021208-HE) for the expansion of cancer services and integration of proton therapy at the UMass Memorial Cancer Center at Marlborough Hospital.

Mevion is proud to be North America's only manufacturer of proton therapy systems, headquartered right here in Central Massachusetts. Our mission is to transform cancer treatment by making proton therapy more accessible and affordable for patients everywhere. As such, we are excited about the prospect of partnering with UMass Memorial Health—a mission-driven health system that shares our commitment to innovation, clinical excellence, and equity—to bring this life-saving technology to the communities of Central and Western Massachusetts.

The expansion of the Marlborough Cancer Center to include proton therapy represents a vital step in closing the health equity gap that exists for many Massachusetts residents. Currently, the only operational proton therapy units in New England are located at Massachusetts General Hospital in Boston, leaving a large geographic area—including some of the most underserved and medically complex populations in the state—without feasible access to this advanced form of radiation therapy. This disparity is particularly acute in counties like Worcester and Berkshire, which face among the highest cancer incidence rates in the Commonwealth.





Proton therapy has been shown to reduce radiation exposure to healthy tissue, lower complication rates, and improve quality of life—particularly for pediatric patients and those with difficult-to-treat cancers. By locating this resource in Marlborough, UMass Memorial Health will alleviate the travel, logistical, and financial burdens currently placed on patients and families who must navigate Boston traffic, exorbitant lodging costs, and long waitlists to access treatment.

Moreover, the partnership between UMass Memorial Health and Mevion supports the Commonwealth's innovation economy and workforce. By sourcing proton therapy technology locally, this project will not only reinforce Massachusetts' leadership in medical technology but also create new opportunities for high-skilled employment, research collaboration, and regional development.

This investment in Central Massachusetts is not only clinically and economically sound—it is morally imperative. Expanding access to proton therapy at the Marlborough Cancer Center will save lives, reduce healthcare costs, and ensure that patients across our state have access to the best that modern medicine has to offer—regardless of their zip code or income level.

For all these reasons, we respectfully urge the Department to approve UMass Memorial Health's Determination of Need application.

Sincerely,

A handwritten signature in black ink, appearing to read "Tina Yu", with a long horizontal line extending to the right.

Tina Yu, Ph.D.
President and Chief Executive Officer
Mevion Medical Systems, Inc.
300 Foster Street
Littleton, MA 01460





Commonwealth of Massachusetts

HOUSE OF REPRESENTATIVES
STATE HOUSE, BOSTON, MA 02133-1054

ANN-MARGARET FERRANTE
REPRESENTATIVE
5TH ESSEX DISTRICT
ESSEX, GLOUCESTER,
MANCHESTER-BY-THE-SEA,
ROCKPORT

VICE CHAIR
House Committee on
Ways and Means

STATE HOUSE, ROOM 238
TEL: (617) 722-2380

April 24, 2025

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

Dear Determination of Need Program,

As the Vice Chair of the House Ways and Means Committee in the Massachusetts Legislature and as a cancer patient now in my fifth year of receiving treatment for pancreatic cancer, I write to offer my unyielding support for UMass Memorial Health's proposal to expand its Marlborough Hospital through the addition of proton therapy capabilities, application number UMMH-25021208-HE.

I am so enthusiastic for this application because cancer patients need access to focused, advanced cancer care close to home. My understanding is that proton therapy is particularly effective for pediatric cancer patients and patients of throat and neck cancer. Young patients especially from Central and Western Massachusetts should not have to travel the extra distance from their homes to Boston if there could be a shorter, more accessible commute. Radiation is difficult enough. Cancer is difficult enough. We should be making treatment easier for patients whenever we have the opportunity. This is one of those opportunities.

Since my own diagnosis, I have been receiving care from a remarkable team at Dana-Farber Cancer Institute in Boston. I am extremely fortunate that world-class care, specific to my kind of cancer, is available to me within an hour's drive from my home. Unfortunately, with no other proton therapy center in New England outside of Boston - the next closest proton therapy center being located in New York City - many residents of Massachusetts don't have the same access to therapies that their diagnoses rely on for treatment as those of us in the Greater Boston area do.

For too many residents of Central and Western Massachusetts who require access to proton therapy, it means long daily commutes to Boston, navigating traffic, parking fees, and hotel costs. All of these are logistical and financial barriers that can be insurmountable for many, especially low-income, young, elderly, or rural patients. I can also personally attest to the mental and physical toll that such prolonged travel takes when you are already undergoing treatment for cancer. These are precisely the challenges that this application will address.

By expanding the Marlborough Cancer Center with proton therapy, the Commonwealth is investing in cutting-edge treatment and delivering equity to the patients who need it most. We're ensuring that Central and Western Massachusetts families can receive world-class care without the burden of a two or three-hour drive or the anxiety of separation from their support networks.

The inclusion of proton therapy in Marlborough will also benefit the Massachusetts economy and workforce. UMass Memorial's partnership with Mevion Medical Systems, a Littleton-based manufacturer that is the only producer of proton therapy systems in North America, means that this is an investment in a state-of-the-art manufacturer in Central Massachusetts, in addition to a commitment to patients.

Massachusetts has long been a leader in health care innovation and proton therapy is at the forefront of cancer treatment innovation. It is more targeted, less damaging to healthy tissue, and especially effective for children and patients with tumors located near critical organs. The expansion of access to proton therapy in Central Massachusetts will reduce long-term costs through fewer complications and hospitalizations and bring market balance to what is currently a limited and overburdened landscape of access in Boston.

I wholeheartedly and without hesitation support the approval of UMass Memorial Health's application. Please do not hesitate to reach out to me if you require any further information.

Sincerely,

A handwritten signature in black ink, appearing to read "Ann-Margaret Ferrante". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Ann-Margaret Ferrante
State Representative, 5th Essex



THE MASSACHUSETTS HOUSE OF REPRESENTATIVES
REPRESENTATIVE KATE HOGAN
THIRD MIDDLESEX DISTRICT
STATE HOUSE, ROOM 370, BOSTON, MASSACHUSETTS 02133-1053

April 17, 2025

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

RE: Letter in support of the proposal to develop a proton therapy service at the UMMC Cancer Center at Marlborough; UMMH-25021208-HE

To whom it may concern,

As a representative of Central Massachusetts communities whose residents would benefit from expanded cancer care services available locally, I write in support of the proposal to develop a proton therapy service at the UMMC Cancer Center at Marlborough.

Since its opening in October 2013, the Cancer Center at Marlborough has been a tremendous success and a source of economic vibrancy and pride for the community. Offering proton therapy at the UMass Memorial Cancer Center in Marlborough will improve health outcomes and the quality of life for patients during and after treatment.

Currently, proton therapy is only available in New England at Massachusetts General Hospital, which has two proton therapy units. The next closest proton therapy center is located in New York City. Data suggests that the two proton therapy units in Boston are not sufficient to support the number of patients who could benefit from proton therapy, especially as population growth and cancer diagnoses continue to rise in Central Massachusetts and across the state. This dynamic means that physicians are forced to make difficult rationing decisions and deny treatment to some eligible patients to prioritize others.

Concentrating innovative cancer care in Boston also means that residents in Central and Western Massachusetts need to travel far from home to receive daily proton therapy treatment, which presents substantial logistical and financial challenges, including hotel expenses, heavy traffic, and parking limitations. This disproportionately impacts low-income residents in Central and Western Massachusetts without flexible jobs, affordable childcare, or a reliable source of transportation. Current proton therapy locations may also put significant strain on elderly patients and prevent those who don't have caretakers, means of travel, or the physical health to travel from seeking treatment. 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 Medicare, Medicaid, and rural patients have local access to cutting-edge cancer treatment without the burden and costs of travel, and/or the difficulty of navigating large, urban healthcare facilities.



THE MASSACHUSETTS HOUSE OF REPRESENTATIVES
REPRESENTATIVE KATE HOGAN
THIRD MIDDLESEX DISTRICT
STATE HOUSE, ROOM 370, BOSTON, MASSACHUSETTS 02133-1053

Earlier this month, Former Lt. Governor Karyn Polito invited me and several state officials and regional leaders to attend a presentation at Mevion Medical Systems in Littleton, MA. Mevion is a leading provider of proton therapy systems for use in radiation treatment for cancer patients and the only manufacturer of proton therapy systems in North America. At Mevion, we learned how proton therapy destroys tumors with precise, targeted doses of radiation, making it the preferred treatment option for patients with cancers in sensitive locations, such as near the brain, spine, heart and eyes. Should this proposal be approved, it's fitting that the proton therapy system used at UMass Cancer Center is from its Central Massachusetts neighbor, Mevion. Offering proton therapy from a local, state-of-the-art manufacturer will make Marlborough a world-class center of cancer care that will touch the lives of many patients, while promoting medical innovation, potential research partnerships, and the creation of new jobs in the cancer space.

The Massachusetts Legislature is committed to ensuring that residents across the Commonwealth have access to quality, affordable health care. We applaud efforts to invest in our health ecosystem and expand access to care for residents in the Commonwealth.

I urge you to approve the proposed development of proton therapy service at the UMMMC Cancer Center in Marlborough. If I can be of further assistance, please do not hesitate to contact my office.

Thank you for your time and attention. I will make myself available to you for any questions or follow up requests that you have.

Sincerely,

A handwritten signature in black ink that reads "Kate Hogan" followed by a horizontal line.

Kate Hogan
State Representative
Third Middlesex District
Speaker Pro Tem

JAMES P. MCGOVERN
SECOND DISTRICT, MASSACHUSETTS

RANKING MEMBER
COMMITTEE ON RULES

COMMITTEE ON AGRICULTURE

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Congress of the United States House of Representatives

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April 25, 2025

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

To Whom It May Concern,

I write today in support of UMass Memorial Health's proposal to develop a Proton Therapy service at the UMMMC Cancer Center at Marlborough (UMass Memorial Health Determination of Need Application UMMH-25021208-HE).

Since October 2013, the UMass Memorial Cancer Center at Marlborough Hospital has been operating within the Medical Center license. It has laid a strong foundation for advanced cancer care in Marlborough and Central Massachusetts more broadly. As the only safety net health system in Central Massachusetts, UMass Memorial Health provides crucial care for over 430,000 of our state's most vulnerable patients. This includes advanced oncological care.

The most common type of radiation—photon therapy—has been effectively used to target tumors in patients, but it often affects parts of the body that are not being treated. Proton therapy is able to more directly target tumors so that radiation exposure stays more localized. Currently the only place in New England where patients can access proton therapy is at Massachusetts General Hospital (MGH) in Boston. This disproportionately disadvantages low-income residents in Central and Western Massachusetts who may not be able to travel to Boston due to a lack of flexible job schedules, affordable childcare, or reliable transportation.

Approval of this application would allow UMass Memorial Health to make this effective and innovative treatment more accessible to cancer patients, and my constituents, in Central and Western Massachusetts. Evidence has shown that a growing number of patients would be better served by proton therapy, including pediatric cancer patients and head and neck cancer patients. Research demonstrates that proton therapy can result in lower rates of complications, hospitalizations, and secondary cancers. This can dramatically improve patient outcomes and increase cost savings.

Additionally, MGH can only treat about 700 patients a year with proton therapy. Expanding the availability of proton therapy to patients in Central and Western Massachusetts

will improve health equity. It will ensure that Medicare, Medicaid, and rural patients have greater access to cutting-edge, effective cancer treatment without the burden of expensive travel.

When the only thing standing in the way of patients and effective treatments is cost and availability, I believe we should do everything in our power to break down those barriers. Expanding the use of proton therapy to UMass Memorial Cancer Center at Marlborough Hospital would do just that. I strongly support this application and encourage your fair and full consideration of it.

Sincerely,

A handwritten signature in blue ink that reads "James P. McGovern". The signature is fluid and cursive, with the first name "James" and last name "McGovern" clearly legible, and the middle initial "P." in the center.

James P. McGovern
Member of Congress



THE GENERAL COURT OF MASSACHUSETTS
STATE HOUSE, BOSTON 02133-1053

April 20, 2025

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

RE: Proton UMMH-25021208-HE

To whom it may concern,

As the undersigned legislators representing the Greater Worcester and Central Massachusetts area, we are writing to express our strong support for UMass Memorial Cancer Center's Determination of Need application which will enable them to bring Proton Therapy to the Cancer Center at Marlborough Hospital.

The UMass Memorial Cancer Center at Marlborough Hospital has been operating within the Medical Center since its opening in 2013. Since then, the partnership has been a tremendous success, and the foundation of advanced cancer care has fostered new and exciting opportunities to enhance cancer treatment in the region and throughout the state.

Proton therapy reduces potential damage to healthy tissue in the body, limits the amount of radiation needed, and minimizes the side effects from cancer treatment. As a result, it improves the health outcomes and quality of life for patients. What's more, it has been proven to be extremely effective in treating children. Presently, proton therapy is only available in New England at Massachusetts General Hospital, with the next closest center being in New York City. Cancer patients in Central and Western Massachusetts deserve to have accessible treatment instead of traveling far from home and being subjected to logistical and financial constraints. By offering proton therapy at Marlborough Hospital, patients will have better access to treatment without the burden, costs, and stress of having to navigate large urban healthcare facilities.

By investing in proton therapy at the UMass Memorial Cancer Center in Marlborough a greater number of patients in the Greater Worcester and Central Massachusetts region will have access to state of the art, lifesaving care that they need and deserve. We believe that patients in this region deserve the most advanced cancer treatment options available.

Sincerely,

A handwritten signature in blue ink that reads "James J. O'Day".

James J. O'Day
State Representative - 14th Worcester

A handwritten signature in blue ink that reads "Michael O. Moore".

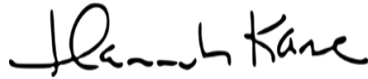
Michael O. Moore
State Senator - 2nd Worcester



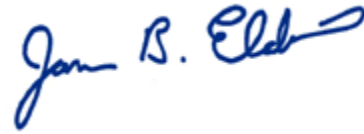
Robyn K. Kennedy
State Senator - 1st Worcester



David Henry Argosky LeBouf
State Representative - 17th Worcester



Hannah Kane
State Representative - 11th Worcester



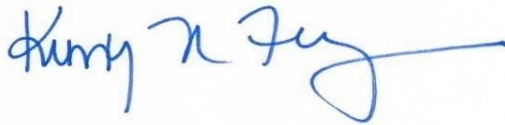
James B. Eldridge
State Senator - Middlesex & Worcester



Brian W. Murray
State Representative - 10th Worcester District



Kate Donaghue
State Representative - 19th Worcester



Kimberly N. Ferguson
State Representative - 1st Worcester



Meghan Kilcoyne
State Representative - 12th Worcester



Michael P. Kushmerek
State Representative - 3rd Worcester

LORI TRAHAN
3RD DISTRICT, MASSACHUSETTS

HOUSE COMMITTEE ON ENERGY
AND COMMERCE

CO-CHAIR, DEMOCRATIC POLICY AND
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April 25, 2025

Director Dennis Renaud
Determination of Need Program
Massachusetts Department of Public Health
67 Forest St
Marlborough, MA 01752

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

Dear Director Renaud,

I am reaching out to express my wholehearted support for UMass Memorial Health's Determination of Need Application UMMH-25021208-HE to establish a proton therapy unit within the Cancer Center at Marlborough Hospital. This proposed implementation of proton therapy in Central Massachusetts would expand access to this innovative care for patients while fueling economic development throughout the region and supporting a local business as they work to manufacture this lifesaving technology.

UMass Memorial Cancer Center at Marlborough has proven to be a reliable hub for advanced cancer treatment. The Cancer Center's features such as linear accelerator and CT simulator technology for radiation therapy and medical oncology have provided a reliable source of care in the region as there has been a continued uptick in cancer diagnoses across the Commonwealth. Proton therapy would provide a crucial added resource that is currently out of reach for patients in Central and Western Massachusetts.

Currently, the only proton therapy provider in New England is within Massachusetts General Hospital in Boston. The ability to receive this lifesaving care in Marlborough would ease the financial strain and logistical hurdles that many patients face when traveling to Boston. Providing proton therapy in Marlborough would give Medicaid and Medicare patients the care they need without adding to the stress of cancer diagnoses.

Mevion Medical Systems, based in Littleton, is currently the only manufacturer of proton therapy within North America and would provide the systems for this project. This partnership to implement proton therapy within UMass Memorial Cancer Center would ensure that the residents of Marlborough and surrounding region have access to the quality of cancer care they deserve while supporting the innovative work that Mevion is doing right here in the Third District. As such, I respectfully request that the UMMH's application receive full and fair consideration. Please do not hesitate to contact my District Director, Maria Syrniotis, at (978) 459-0101 with any questions you may have. Thank you for your attention to this important matter.

Sincerely,

Lori Trahan
Member of Congress

April 24, 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 Sergio Melgar, and I serve as the Chief Financial Officer and an Executive Vice President at UMass Memorial Health. As someone who has been treated with proton therapy, I would like to express my support of UMass Memorial Health's Determination of Need Application UMMH-25021208-HE to develop a Proton Therapy Service at the UMass Memorial Medical Center Cancer Center in Marlborough.

Receiving cancer treatment is physically, emotionally, and financially draining for patients and their families. When I was diagnosed with squamous carcinoma, a rare, inoperable tumor in the middle of my head, my physician recommended proton therapy due to the difficult location of the tumor and the need for enhanced precision. The regimen required daily treatment for six weeks at Massachusetts General Hospital, the only location in New England that currently provides proton therapy. The prospect of traveling from Central Massachusetts every day to Massachusetts General Hospital led us to rent an apartment in Boston for the duration of my treatment. We were privileged in our ability to afford lodging close to the proton treatment center – an option that is not financially possible for many other patients that could also benefit from proton therapy.

Like other patients from Central and Western Massachusetts, I would have benefited greatly from proton therapy offered closer to home. During treatment, I experienced frequent nosebleeds and was physically fatigued. I couldn't walk far on my own. I also was immunosuppressed and had to remain isolated in our temporary apartment. Receiving treatment far from the comforts and familiarity of our home, as well as the community that continues to support us, was a personal hardship for my family and I that added additional stress to an already taxing situation.

There was a time when I received traditional radiation at Marlborough Hospital for another cancer diagnosis, and the experience was more convenient. The Cancer Center was near our home, easy to drive to, less logistically complicated, and much simpler for my family and I to navigate. The option of receiving proton therapy in Marlborough would have greatly enhanced my quality of life and would have been easier for my family.

Offering proton therapy at the Cancer Center in Marlborough will make this lifesaving treatment available and convenient for patients in Central Massachusetts and across the region. It will ensure that patients who may be unable to afford to travel far from home for treatment can access the care they need and deserve without added barriers. Clearly, an extended stay in the Marlborough area would be at least half the cost of an extended stay or daily travel in Boston. Having the option to receive proton therapy outside of Boston will help patients – and their families – maintain a better quality of life as they face the fight against cancer together.

For these reasons, I am proud to support UMMH's proposal to introduce a Proton Therapy Service in Marlborough.

Kind regards,

A handwritten signature in blue ink, appearing to read 'Sergio Melgar', is positioned below the 'Kind regards,' text.

Sergio Melgar
EVP, Chief Financial Officer
UMass Memorial Health



The Commonwealth of Massachusetts
MASSACHUSETTS SENATE

SENATOR JAMES B. ELDRIDGE
Middlesex and Worcester District

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MARLBOROUGH, MA 01752

April 25, 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: Support of Determination of Need Application UMMH-25021208-HE

Dear Director Renaud,

As the State Senator for the Middlesex and Worcester District, which includes the city of Marlborough, I'm writing to express my strong support of UMass Memorial Health's Determination of Need Application **UMMH-25021208-HE** to develop a Proton Therapy Service at the UMass Memorial Medical Center Cancer Center in Marlborough.

Since 2013, the Cancer Center in Marlborough has provided countless patients with cutting-edge, lifesaving care and is regarded as a regional leader in radiation oncology. The Cancer Center and larger UMass Memorial Health system also serve a high percentage of patients on public insurance, acting as a critical lifeline for our region's most in-need residents. I believe UMass Memorial Health's proposal to develop a proton therapy service in Marlborough will expand on the Cancer Center's impressive legacy and enhance equitable access to advanced cancer care throughout the state.

Due to its precise delivery of radiation, proton therapy can reduce potential damage to healthy tissue in the body, the amount of radiation needed, and side effects from cancer treatment. Because of this, proton therapy is particularly effective in treating children, whose long-term growth and development can be disproportionately impacted by unintended cell damage. Patients in Central Massachusetts – and the children in our communities – deserve the opportunity for improved health outcomes and a higher quality of life during and after treatment.

Patients in Central Massachusetts and across the Commonwealth deserve access to the best cancer treatment options available. However, patients currently must travel to Massachusetts General Hospital in Boston to receive proton therapy, which is the only provider offering this service in New England. As a result, residents in

Central and Western Massachusetts must travel long distances to receive daily proton therapy treatment, which presents substantial logistical and financial challenges, including hotel expenses, heavy traffic, limited parking and significant disruptions to their daily lives. For some patients, those barriers are too steep, and they are forced to choose alternative treatment options that may be less effective in treating their cancer.

Expanding access to proton therapy in Central Massachusetts is therefore not just about enhancing health outcomes but also about health equity. All patients should have local access to cutting-edge cancer treatment in a lower cost, more geographically convenient setting. As cancer treatment technology continues to rapidly evolve, a patient's zip code, ability to travel, or access to transportation should not determine the scope or quality of their care.

Investing in the Cancer Center will also establish a local innovation hub that furthers Massachusetts' reputation as a leader in cutting-edge health care by promoting medical innovation, potential research partnerships, and the creation of new jobs in the cancer space. Moreover, the proton therapy system that UMass Memorial Health plans to acquire is from Mevion Medical Systems – a Littleton-based company that is the only manufacturer of proton therapy systems in North America. I believe bringing proton therapy to the Cancer Center will have a sustained positive impact on our region, while also supporting a state-of-the-art manufacturer located in Central Massachusetts.

For the above reasons, I support UMass Memorial Health's Determination of Need Application. Thank you for your ongoing work to facilitate this process.

Sincerely,



James B. Eldridge

State Senator

Middlesex & Worcester District