



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

April 11, 2025

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

**RE: Letter in support of UMass Memorial Health's proposed merger with Marlborough Hospital;
UMMHC-25012116-TO**

To whom it may concern,

We write to you today to express our steadfast support of UMass Memorial Health's (UMMH) proposal to merge Marlborough Hospital with UMass Memorial Medical Center. The proposed merger with Marlborough Hospital will enhance cost-effective patient care, improve health outcomes, reduce health care costs, and drive innovation and economic development.

The Marlborough Hospital is essential to the fabric of Central Massachusetts communities and the proposed merger will ensure patients receive cost-effective, high-quality care in the appropriate community-based setting. Currently, Marlborough Hospital doesn't have the patient volume or staffing to support a wide array of specialty services on site, forcing patients to be transferred to the Medical Center or another facility to access advanced services. These lack of services delay patients from receiving the timely care they need and creates extra costs for patients, as they are often responsible for the cost associated with transfer via ambulance or LifeFlight. As a campus of the Medical Center, Marlborough Hospital will offer access to an array of innovative programs, specialty care and consultations, and a single, coordinated clinical team. Access to these programs have proven to result in better outcomes for patients, increase caregiver satisfaction, enhance the financial outlook of the hospital, and will ultimately help strengthen health care in our region.

The mission of UMMH is to provide comprehensive, compassionate care to all patients across the region, and by bringing Marlborough Hospital under the Medical Center license, the facility can better manage patient care, improve health outcomes, drive quality improvement initiatives, and build a more responsive and patient-centric health care environment. By offering more advanced specialty care from the Medical Center in the Marlborough community, UMMH will prevent patients from needing advanced care at Boston facilities owned and operated by higher-cost providers. Bringing Marlborough under the Medical Center license will also allow the system to better optimize operations and improve inpatient bed utilization, which can result in cost savings by ensuring that patients are being treated in the most medically appropriate care setting. There are also other strategies in the works that will facilitate lower health care costs over the long-term such as the UMMH's Hospital at Home program, Subacute Rehab at

Home program, mobile integrated health, virtual primary care, telehealth and other digital tools and technologies that support caregivers and patients.

The system has also committed to significant investments that will reduce overcrowding and patient wait times, improve the care experience, and boost caregiver morale. Pending regulatory approval, these proposed investments include a \$36 million expansion of Marlborough's Emergency Department, a \$6 million Multidisciplinary Clinic and a new CT system. UMMH also plans to invest an additional \$100 million into inpatient room renovations and modernization improvements. These investments demonstrate UMMH's deep commitment to the people of Central Massachusetts; these projects will position Marlborough as a center of medical excellence and major employment hub, transforming the experience for patients, visitors, and employees for generations to come. Investing in and stabilizing health care in Marlborough will spur regional economic growth through job creation, medical innovation, and potential research partnerships, furthering Massachusetts' reputation as a leader in cutting-edge health care.

UMMH is the largest health care system and employer in Central Massachusetts with more than 20,000 employees and 2,400 physicians. They care for a diverse population of more than 430,000 patients and are the only safety net health system in Central Massachusetts, with almost 70 percent of UMMH's patients insured by Medicare or Medicaid. The UMass Memorial Cancer Center at Marlborough Hospital has been operating within the Medical Center license since its opening in October 2013, and the partnership has been a tremendous success. Therefore, we are in full support of the proposed merger of Marlborough Hospital and UMass Memorial Medical Center. Thank you for your attention to this matter, if you have any questions, please do not hesitate to contact our offices.

Sincerely,



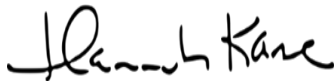
Senator Michael O. Moore
Second Worcester District



Representative Kate Donaghue
Nineteenth Worcester District



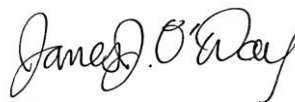
Representative Paul K. Frost
Seventh Worcester District



Representative Hannah Kane
Eleventh Worcester District



Senator Robyn Kennedy
First Worcester District



Representative James J. O'Day
Fourteenth Worcester District



Representative Kimberly N. Ferguson
First Worcester District



Senator James B. Eldridge
Middlesex and Worcester District



Representative Carmine Lawrence Gentile
Thirteenth Middlesex District



City of Marlborough

J. Christian Dumais, Mayor

Office of the Mayor

140 Main Street
Marlborough, MA 01752
(508) 460-3770

Mayor@marlborough-ma.gov

April 10, 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 UMMHC-25012116-TO

Dear Mr. Renaud,

As the Mayor of Marlborough and a fifth-generation resident of this great city, I understand firsthand and witness every day the central role that Marlborough Hospital plays in supporting the vitality of our community. For these reasons, I am proud to support UMass Memorial Health's Determination of Need Application UMMHC-25012116-TO for the transfer of ownership of Marlborough Hospital to UMass Memorial Medical Center, Inc.

Marlborough Hospital has served the City of Marlborough and the region for 135 years and has been a tremendous asset to both residents and the business community as a center of employment and medical excellence. UMass Memorial Health and Marlborough Hospital provide valuable resources to the City, our residents and our business ecosystem by not only providing care when people are sick but also through community education, collaboration and outreach programs that improve health and wellbeing throughout Central Massachusetts.

Ensuring and preserving access to high-quality, safe, state-of-the-art health care, especially for the most vulnerable residents in our community, are priorities for my administration and the constituents I serve. As a campus of the Medical Center, Marlborough Hospital will have enhanced access to tertiary care, specialty services and consultations, advanced technology, and innovative programs, like Hospital at Home. This will also ensure patients receive cost-effective care in the most appropriate community-based setting.

As health care providers across the Commonwealth face sustained financial pressures and unpredictability, we need to support the hospitals that have long delivered compassionate care right in the heart of our community. This change will enhance the financial outlook of Marlborough Hospital and strengthen health care in the region by making available more financial and clinical resources for this keystone institution at a time when instability in health care continues to threaten access.

I recommend that the Department of Public Health and Determination of Need program strongly consider approving this application for its investment in the people and future of Marlborough.

Sincerely,

J. Christian Dumais
Mayor
City of Marlborough



The Commonwealth of Massachusetts

HOUSE OF REPRESENTATIVES
STATE HOUSE, BOSTON 02133-1054

Committees:
Health Care Financing
Public Health
Ethics
State Administration
and Regulatory Oversight
Steering, Policy and Scheduling

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

April 11, 2025

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

Re: UMMHC-25012116-TO

To whom it may concern,

I write in support of UMass Memorial Health's proposal to merge Marlborough Hospital with the UMass Memorial Medical Center. This merger will expand access to high-quality healthcare, improve patient outcomes, and strengthen the regional economy of Central Massachusetts.

Marlborough Hospital is a vital part of the healthcare system in Central Massachusetts, but currently lacks the ability to provide a variety of on-site specialty services. Patients who need advanced care must be transferred to the UMass Memorial Medical Center or another facility, increasing costs for patients and delaying care. Bringing Marlborough Hospital under the UMass Medical Center license will give patients at Marlborough Hospital greater access to specialty care and programs such as Hospital at Home, ensuring that patients can receive timely, high-quality care in their community.

In addition, bringing Marlborough Hospital under the Medical Center license will improve coordination of care and allow the system to optimize operations, further enhancing patient care and reducing healthcare costs. Marlborough Hospital and UMass Memorial Medical Center have enjoyed a successful partnership since the UMass Memorial Cancer Center was established in 2013, and the proposed merger will improve healthcare access and quality in Central Massachusetts while reducing costs.

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,

A handwritten signature in black ink that reads "Hannah Kane".

Hannah Kane
State Representative



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

April 11, 2025

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

RE: Letter in support of UMass Memorial Health's proposed merger with Marlborough Hospital; UMMHC-25012116-TO

To whom it may concern,

As a representative of Central Massachusetts communities whose residents rely on Marlborough Hospital and will benefit from continued access to cost-effective and enhanced services, I write in support of the proposed merger of UMass Memorial Health and Marlborough Hospital.

Currently, Marlborough Hospital doesn't have the patient volume or staffing to support a wide array of specialty services on site, so patients must be transferred to the UMass Medical Center in Worcester or another facility to access advanced services. This adds cost and can delay patients from receiving the timely care they need.

UMass Memorial Health is the largest health care system and employer in Central Massachusetts with more than 20,000 employees and 2,400 physicians. UMass Memorial Health provides care to a diverse population of more than 430,000 patients and is the only safety net health system in Central Massachusetts, with almost 70 percent of its patients insured by Medicare or Medicaid. Bringing Marlborough Hospital under the Medical Center license, UMass Memorial Health can better manage patient care, improve health outcomes, drive quality improvement initiatives, and build a more responsive and patient-centric health care environment.

UMass Memorial Health has also committed to significant investments that will reduce overcrowding and patient wait times, improve the care experience, and boost caregiver morale. Pending regulatory approval these proposed investments include a \$36M expansion of Marlborough's ED, a \$6M Multidisciplinary Clinic and a new CT system. UMass Memorial Health also has a vision to invest an additional \$100M into inpatient room renovations and modernization improvements.

Massachusetts prides itself on having world-class healthcare, but that is only meaningful if patients can access it. With expanded access to specialty care from the Medical Center, residents in our community won't need to seek out advanced care at Boston facilities owned and operated by higher-cost providers. As a campus of the Medical Center, Marlborough Hospital will offer community members access to innovative programs, like Hospital at Home; specialty care and consultations, such as teleconsultations; and a single, coordinated clinical team. This will result in better outcomes for patients, increase caregiver satisfaction, enhance the financial outlook of the hospital, and help strengthen health care in our region. It will also ensure patients receive cost-effective, high-quality care in the appropriate community-based setting.

UMass Memorial Health's planned investments at Marlborough will boost local construction activity and improve the working experience of our caregivers. These projects will position Marlborough as a center of medical excellence and major employment hub, transforming the experience for patients, visitors, and employees for generations to come.

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 merger of Marlborough Hospital and UMass Memorial Medical Center. If I can be of further assistance, please do not hesitate to contact my office.

Thank you for your time and attention.



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

Sincerely,

A handwritten signature in black ink, appearing to read "Kate Hogan", followed by a horizontal line.

Kate Hogan
State Representative
Third Middlesex District
Speaker Pro Tem

April 10, 2025

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

**RE: Support for UMass Memorial Health's Proposed Merger with Marlborough Hospital;
UMMHC-25012116-TO**

To Whom It May Concern,

I am writing to voice my strong support for the proposed merger between UMass Memorial Health (UMMH) and Marlborough Hospital.

Marlborough Hospital plays a vital role in meeting the healthcare needs of our community. Unfortunately, the current limitations in specialty services mean that many patients are forced to travel outside the area to receive the care they need. This proposed merger would allow for greater access to specialized care right here in Marlborough, reducing the need for unnecessary transfers and helping ensure timely, high-quality treatment close to home.

UMMH, as the region's only safety-net health system, has long demonstrated a deep commitment to accessible, patient-centered care. Integrating Marlborough Hospital under the UMass Memorial Medical Center license will enable more coordinated patient care, improved health outcomes, and a more efficient, responsive healthcare system overall. It's worth noting that the UMass Memorial Cancer Center at Marlborough Hospital has successfully operated under this model since 2013, delivering outstanding results.

UMMH's investment plans for Marlborough Hospital are equally impressive. With over \$140 million in improvements—including a \$36 million expansion of the Emergency Department, a new \$6 million Multidisciplinary Clinic, major inpatient renovations, and advanced diagnostic equipment—this merger will benefit both patients and the regional economy. These upgrades will enhance patient care, improve working conditions for staff, and create significant opportunities for local construction and job growth.

Beyond the physical improvements, this merger represents a broader commitment to health equity and affordability. By expanding services in Marlborough, the system will reduce the need for costly travel to Boston for specialty care, ensuring patients can access the services they need in a more convenient and cost-effective way.

Given the success of past collaborations and the clear benefits of this proposal, I fully support UMass Memorial Health's plan to integrate Marlborough Hospital under the Medical Center license. Please feel free to reach out to my office if you have any questions or require additional information.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Meghan K. Kilcoyne'.

Meghan K. Kilcoyne
State Representative
12th Worcester District



The Commonwealth of Massachusetts
MASSACHUSETTS SENATE

SENATOR JAMES B. ELDRIDGE
Middlesex and Worcester District

STATE HOUSE, ROOM 511C
BOSTON, MA 02133-1053
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Chair
JOINT COMMITTEE ON REVENUE
Vice Chair

JOINT COMMITTEE ON THE JUDICIARY
JOINT COMMITTEE ON STATE ADMINISTRATION AND
REGULATORY OVERSIGHT

DISTRICT OFFICE
255 MAIN STREET, ROOM 219A
MARLBOROUGH, MA 01752

April 11, 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 UMMHC-25012116-TO

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 support of UMass Memorial Health's Determination of Need Application UMMHC-25012116-TO for the transfer of ownership of Marlborough Hospital to UMass Memorial Medical Center, Inc.

Marlborough Hospital is a small community hospital with 79 licensed inpatient beds, but it plays an outsized role in shaping the health and wellbeing of our region. As part of the broader UMass Memorial Health system, Marlborough Hospital cares for some of our community's most in-need patients, ensuring critical access to high-quality, affordable care close to where people live and work.

In recent years, Central Massachusetts has been particularly impacted by the erosion and instability of our state's health care ecosystem. Frequently, I hear from my constituents and colleagues about how local hospital closures, limited access to primary and specialty care, and rising costs exacerbate existing barriers to care and threaten to undermine the vitality of our community. Bringing Marlborough Hospital under the Medical Center's license is the best solution for protecting and enhancing care in our region, which cannot afford to lose another community hospital.

Like many facilities of a similar size, Marlborough Hospital currently cannot support providing a wide array of specialty services on site. Often, patients must be transferred to the Medical Center or another facility for advanced medical services. This can cause delays in care, frustration and worry, and increase costs for patients, as they are often responsible for the cost of transfer via ambulance or LifeFlight. As

part of the Medical Center, patients at Marlborough Hospital would have expanded access to community-based specialty care and consults, cutting-edge technologies, and tertiary services, keeping care local and helping patients avoid the need to seek out advanced care at Boston facilities owned and operated by higher-cost providers.

At a time when community hospitals across the state are facing unprecedented challenges, we must turn to creative solutions that prioritize patient care, advance health equity and improve health outcomes. UMass Memorial Health has proven to be a valuable partner in stabilizing health care in Central Massachusetts, and this project is a testament to its commitment to Marlborough Hospital's ability to serve the community now and for generations to come.

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

Sincerely,

A handwritten signature in blue ink, reading "James B. Eldridge".

James B. Eldridge

State Senator

Middlesex & Worcester District



DEBORAH DEVAUX
CHAIR

The Commonwealth of Massachusetts
HEALTH POLICY COMMISSION
50 MILK STREET, 8TH FLOOR
BOSTON, MASSACHUSETTS 02109
(617) 979-1400

DAVID M. SELTZ
EXECUTIVE DIRECTOR

Via Email and First Class Mail

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

Re: *UMass Memorial Health Care Determination of Need Application # UMMHC-25012116-TO*

Dear Mr. Renaud:

Pursuant to Mass. Gen. Laws ch.111, § 25C(g) and (i) and the Department of Public Health's (DPH) regulations at 105 CMR 100.435, the Health Policy Commission (HPC) submits the following comment regarding the above-referenced matters for consideration by DPH and the applicant, UMass Memorial Health Care (UMMHC).

The HPC has elected to exercise its authority to comment on the above-referenced application to inform DPH and UMMHC that this transaction is currently under review as a Notice of Material Change (MCN). Our analyses are still in progress, but we anticipate that moving Marlborough Hospital onto the license of UMass Memorial Medical Center (UMMMC) allows Marlborough to receive UMMHC's higher academic medical center rates, and spending for care provided by Marlborough would increase. We encourage DPH to consider this impact as part of its review and any conditions of approval it requires. Upon the completion of the HPC's review, we will provide our findings to DPH.

We hope that this comment provides important context for the consideration of this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "David Seltz".

David Seltz
Executive Director



The Commonwealth of Massachusetts

HOUSE OF REPRESENTATIVES
STATE HOUSE, BOSTON 02133-1054

REPRESENTATIVE
DANIELLE W. GREGOIRE
REPRESENTING THE PEOPLE OF
THE 4TH MIDDLESEX DISTRICT

DIVISION CHAIR

STATE HOUSE, ROOM 21
TEL: (617) 722-2140
Danielle.Gregoire@MAhouse.gov

April 10, 2025

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

**RE: Support for UMass Memorial Health's Proposed Merger with Marlborough Hospital;
UMMHC-25012116-TO**

To whom it may concern,

I write to express my strong support for UMass Memorial Health's (UMMH) proposal to merge Marlborough Hospital with UMass Memorial Medical Center.

Marlborough Hospital is an essential part of our community and the surrounding area. Currently, Marlborough lacks the capacity to support a wide range of specialty services, often forcing patients to seek advanced care elsewhere. The merger would eliminate unnecessary transfers and provide local access to specialty care. It is critical that we protect and enhance its services so that residents across Central Massachusetts can continue to receive high-quality care close to where they live and work—now and in the future.

As the region's only safety-net health system, UMMH is committed to delivering comprehensive, compassionate care to all. By bringing Marlborough under the Medical Center license, UMMH can better manage patient care, improve outcomes, drive quality improvement initiatives, and create a more responsive, patient-centered healthcare system. The UMass Memorial Cancer Center at Marlborough Hospital has been operating within the Medical Center license since its opening in October 2013, and the partnership has been an incredible success.

UMMH has also committed to significant investments at Marlborough Hospital that will benefit both patients and the local economy. These include a \$36 million Emergency Department expansion, a \$6 million Multidisciplinary Clinic, a new CT system, and \$100 million in planned inpatient renovations. These improvements will reduce wait times, ease overcrowding, and enhance the work environment for caregivers. They will also drive local construction activity and position Marlborough as a center of medical innovation and a key employment hub for the region.

These investments reflect UMMH's deep commitment to strengthening healthcare in our region. By expanding access to specialty services in Marlborough, the system will reduce the need for patients to travel to higher-cost Boston facilities, ensuring more affordable, community-based care.

Given UMMH's successful track record—including the UMass Memorial Cancer Center at Marlborough Hospital—I fully support this proposed merger. Please don't hesitate to contact my office with any questions.

Sincerely,

A handwritten signature in blue ink, reading "Danielle W. Gregoire". The signature is fluid and cursive, with a large initial "D" and "G".

Danielle W. Gregoire
State Representative