



November 4, 2022

Determination of Need Program  
Massachusetts Department of Public Health  
250 Washington Street, Boston, MA 02108  
Sent via E-mail to: [DPH.DON@massmail.state.ma.us](mailto:DPH.DON@massmail.state.ma.us)

To Whom It may Concern:

On behalf of the 75,000 members of the Massachusetts Division of 1199SEIU, we write to offer these written comments relative to the October 28<sup>th</sup> public hearing on Determination of Need Application BMCHS-22080908-HE. These comments are also submitted by the 1199SEIU Ten Taxpayer Group formed to represent the interests of the more than 3,000 Boston Medical Center nurse, unlicensed assistive personnel, service, maintenance, clerical, professional and technical worker members of the Massachusetts division of 1199SEIU.

**While we support this application, we are asking that the Determination of Need program reviewing staff request additional information from the applicant prior to a vote on approval.**

With this application filed 9/9/22, BMC Health System, Inc. has filed for approval of a proposed project at the Boston Medical Center Corporation (BMC) for the construction and renovation to BMC's existing Yawkey Building that would add seventy new inpatient beds. The project also includes the planned renovation of BMC's existing Menino Building to add five new inpatient operating rooms as well as several other smaller related construction and renovation projects. The proposed project is projected to cost about \$121 million.

If approved, this application would help to significantly improve patient capacity at BMC. As outlined in their application, BMC has significant capacity challenges due to recent increases in patient volume and limits to their ability to implement "strategic space modifications" that fully address inefficiencies associated with BMC's campus layout. Inpatient service utilization at the Hospital has significantly increased demand and caused capacity constraints across the Hospital. The proposed project would prudently and cost-effectively increase capacity by prioritizing BMC's existing infrastructure through small additions, renovations, and relocations rather than with new construction.

We share the applicant's belief that the proposed project would improve BMC's ability to accommodate increasing patient volume, to offer cost-effective care, and to contribute to statewide cost containment by ensuring timely and equitable access to services in appropriate settings. Accordingly, we generally support the application and the proposed project. However, **we are concerned about BMC's ability to fully staff the proposed 70 new inpatient beds and the 5 new operating rooms.**

Without careful planning, the proposal threatens to exacerbate the current healthcare worker staffing crisis.<sup>1</sup> As the state works to meet increasing demand and to address growing costs, we must find a balance that mitigates any unintended negative impact on the healthcare workforce.

The pandemic has had a devastating impact on the 199SEIU-represented BMC workforce even as they have continued to show up every day to serve an increasing volume of patients. But these frontline healthcare workers are already being asked to continue to provide quality care without sufficient staffing and BMC has had difficulties recruiting and retaining an adequate workforce in the current labor market. If BMC's expansion project goes forward, it must be accompanied by a comprehensive plan to recruit and retain sufficient staff as needed for 70 new inpatient beds and 5 new operating rooms.

For these reasons, **we ask the Department to seek clarifying information from the applicant concerning their staff recruitment and retention planning, and to carefully consider this information when determining whether approval of this application is appropriate.** Thank you for your time and attention in this important matter.

Sincerely,

Dana Alas  
Vice President – BMC & Community  
1199SEIU – MA Division

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<sup>i</sup> Widespread staffing shortages have been repeatedly and extensively reported by 1199SEIU hospital workers, by Boston Medical Center, and by our other hospital employers. The late October 2022 report published by the Massachusetts Hospital Association found that *“An estimated 19,000 acute care hospital positions are unfilled. Wait times have increased as hundreds of patients are boarding in emergency departments and other units... These challenges, which are resulting in care delays and reduced access to services, are now evident to many patients and families entering a healthcare facility or trying to address their care needs.”* (<https://bit.ly/3NMP5aF>)



City of Boston, Massachusetts  
Office of the Mayor  
**Michelle Wu**

October 28, 2022

VIA EMAIL to [DPH.DON@massmail.state.ma.us](mailto:DPH.DON@massmail.state.ma.us)  
Massachusetts Department of Public Health, Determination of Need Program,  
67 Forest Street  
Marlborough, MA 01752

Re: Support for Boston Medical Center Project

Dear Determination of Need Program Staff,

I am writing in support of the Determination of Need ("DoN") application filed by BMC Health System, Inc. because I believe the BMC project will advance the health and wellbeing of the people of Boston. As you know, the plan includes 1) construction and renovation to BMC's existing Yawkey Building 5th and 6th floors to accommodate the addition of seventy (70) new inpatient beds, 2) renovation of BMC's existing Menino Building 2nd floor for the addition of five (5) new inpatient operating rooms (ORs); and 3) other construction and renovation projects to support the inpatient expansion infrastructure and improve existing services, facilities, and the overall patient experience.

As a safety net hospital that serves a patient population largely reliant on Medicaid and Medicare for coverage, BMC plays an integral role in the city's, and region's, healthcare system. This proposal responds to a documented increase in demand for the services being proposed—a demand being driven by increasingly acute inpatient needs, the complex care required to treat patients experiencing homelessness and substance use disorder, and the growing urgency of addressing social determinants of health. BMC is also the busiest provider of trauma and emergency services in the region, offering services that work in close coordination with Boston EMS to provide life-saving care to our most critical patients. BMC's ability to more efficiently and effectively provide these services as envisioned in this proposal is vitally important to the public health system in Boston.

The proposed project also includes a significant community health initiative ("CHI") contribution of more than \$6 million. Approximately 25% of these funds will support a statewide CHI and approximately 75% will go towards local CHI funding to address the social determinants of health including social and built environments, housing, violence and trauma,

employment, and education. The City of Boston looks forward to continued partnership with BMC to address these factors, improve patient outcomes, and advance health equity in Boston. More than \$120 million in capital expenditures will also have significant positive economic impacts for Boston, including expanded opportunities for employment in construction and new career pathways for Boston residents.

For these reasons, I am pleased to support this project.

Sincerely,

A handwritten signature in black ink that reads "Michelle Wu". The signature is written in a cursive, flowing style.

Michelle Wu  
Mayor of Boston

**Congress of the United States**  
**House of Representatives**  
**Washington, DC 20515**

November 4, 2022

Massachusetts Department of Public Health  
Determination of Need Program  
67 Forest Street  
Marlborough, MA 01752  
Attn: Elizabeth Kelley, MBA, MPH, Director, Bureau of Health Care Safety and Quality

RE: BMC Health System, Inc. – Boston Medical Center Determination of Need Application # BMCHS-22080908-HE

Dear Ms. Kelley:

Thank you for the opportunity to comment on the Determination of Need (“DoN”) application pertaining to the proposed inpatient expansion at Boston Medical Center (“BMC” or “the Hospital”). As a legislator whose district includes BMC, I am writing today in support of the Proposed Project and to urge the Department of Public Health (“DPH”) to recommend its approval.

BMC is a premier provider of health care services. It is an academic medical center that offers a full spectrum of high-quality emergency, outpatient, and inpatient services, as well as specialized care for complex health problems. It is the busiest provider of trauma and emergency services in New England and the region’s largest safety net hospital. It is the primary teaching affiliate for the Boston University School of Medicine and a prominent research institution. BMC also is a leader in social determinants of health (“SDoH”) programming and health equity initiatives.

Despite its status as a renowned Hospital providing exceptional care without exception, capacity constraints at BMC threaten its ability to meet its patient panel demand and support the Greater Boston community. In fact, with medical/surgical occupancy rates greater than 90%, intensive care unit (“ICU”) occupancy rates greater than 80%, inpatient operating rooms (“ORs”) often operating above 80%, and an Emergency Department (“ED”) that is significantly backlogged and overcrowded, the Hospital’s need for additional inpatient space is critical. Without additional inpatient beds and ORs, it is anticipated that inpatient utilization rates will continue to rise to unsustainable levels as patient volume and acuity levels continue to increase, Hospital throughput will continue to be negatively impacted, and patients will continue to face increased wait times and delays in diagnosis and treatment. All of these factors will have a negative impact on patient health outcomes and quality of life, particularly for the most vulnerable members of our community.

The Hospital proposes to address the need for additional inpatient space through the Proposed Project by adding an additional sixty (60) medical/surgical beds, ten (10) ICU beds, and five (5) inpatient ORs. The proposed design for implementation of such Proposed Project is measured and strategic; rather than building a new tower, BMC proposes to accommodate the new beds and ORs

by utilizing its existing space through small additions and interior renovations and relocations. This design is thoughtful, economical, and will allow the Hospital to meet its goals of providing high-quality, cost-effective, exceptional care into the future. The Proposed Project also will generate a contribution of more than \$6 million in community health initiatives and, therefore, will be instrumental in helping to address SDoHs and health equity issues that impact residents across the Commonwealth.

BMC's Proposed Project is impressive. It represents a thoughtful and innovative approach to addressing patient needs in a cost-effective manner without jeopardizing quality care. The Hospital has a long history of supporting our community, and particularly the most vulnerable among us, and this expansion will allow the Hospital to continue such commitment into the future. For these reasons, I fully support BMC's Proposed Project and respectfully request that DPH also support the proposal by recommending its approval. Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink that reads "Ayanna S. Pressley". The signature is fluid and cursive, with a long, sweeping underline that extends to the right.

Ayanna Pressley  
Member of Congress

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**From:** Martin,Petrina <Petrina.Martin@bmc.org>  
**Sent:** Monday, November 7, 2022 4:28 PM  
**To:** DPH-DL - DoN Program  
**Subject:** Testimony - BMC Health System, Inc. - Boston Medical Center - Hospital Substantial Capital Expenditure (DoN Application # BMCHS-22080908-HE)

Dear Director Renaud:

I am writing to respectfully request that the Department of Public Health (“DPH”) recommend approval of BMC Health System, Inc.’s Determination of Need (“DoN”) application for an inpatient expansion at Boston Medical Center (“BMC” or “the Hospital”).

I currently serve as the Vice President of Community Engagement and External Affairs at BMC and have over 25 years of experience specializing in multiple industries in health care equity and social determinants of health (“SDoHs”), diversity and inclusion, and community program development. I am very supportive of the Proposed Project for a number of reasons, but the primary reason being access to high-quality and equitable care and services for our Greater Boston community.

For over 100 years, BMC has been driven by a commitment to provide exceptional health care to all in need regardless of insurance status or ability to pay; what we call “exceptional care without exception.” The Hospital is one of the busiest trauma and emergency services centers and the largest safety-net hospital in New England. Moreover, the Hospital is a leader in SDoH programming and health equity initiatives, and has numerous processes and programs in place to ensure linkages to services beyond the traditional medical model to remediate gaps created by the SDoHs, meet the unmet basic needs of the many diverse and vulnerable individuals that we serve, and improve health outcomes for our patients. For instance, efforts around screening at the Hospital are aimed at understanding the social needs impacting patients’ health, improving patient care by communicating social needs to care teams, partnering with community-based organizations to eliminate systemic barriers that prevent patients from thriving, and providing patients with information on hospital-based and community resources that can mitigate their social needs. Examples of hospital-based and community programs and resources that we connect our patients and families to include investments in housing, food-related programs, programs related to education, job training, and employment, programs and services that support financial wellness (e.g., programs that help people apply for health coverage, access no- or low-cost medications, obtain food and groceries, pay their utility bills, file tax returns and secure refunds, programs related to violence and building safer communities, and more).

Notwithstanding our status as a premier Hospital providing exceptional care without exception, current capacity constraints threaten our ability to meet our patient panel demand and support the Greater Boston community of which we are an integral part. To meet this demand and achieve the objectives of equitable care, the Proposed Project is necessary. Specifically, the Proposed Project will help ensure that we have the resources and depth of services necessary to provide our patients, and particularly our disadvantaged patients, with timely access to high-quality care that does not jeopardize outcomes. Moreover, the Proposed Project will allow BMC to build upon successful population health management and value-based reimbursement successes – by screening and assisting

more patients with costs associated with the social drivers of health. Finally, the Proposed Project will include a \$6 million contribution to community health initiatives and, therefore, is important in addressing SDOHs that impact our patients, including social environment, built environment, housing, violence and trauma, employment, and education.

For these reasons and more, I strongly support and urge DPH to approve and BMC's Proposed Project. Thank you for your time and consideration.

Sincerely,  
Petrina Martin Cherry  
Vice President of Community Engagement and External Affairs  
Boston Medical Center



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**EXCEPTIONAL CARE. WITHOUT EXCEPTION.**

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