

VIA EMAIL: [DPH.DON@massmail.state.ma.us](mailto:DPH.DON@massmail.state.ma.us)

Monday, August 1, 2022

Determination of Need Program  
Massachusetts Department of Public Health  
250 Washington Street  
Boston, MA 02108

Att: Elizabeth D. Kelley, MBA, MPH, Director, Bureau of Health Care Safety and Quality

RE: Determination of Need Application #UMMHC-22042514-HE for a Substantial Capital Expenditure and Substantial Change in Service (the "Application") for UMass Memorial Medical Center ("UMMMC") by UMass Memorial Health Care, Inc. ("Applicant")

Dear Ms. Kelley,

As the governing board of Saint Vincent Hospital, we have a duty to safeguard the institution, consider the best interest of community stakeholders, including patients, and promote health care in Greater Worcester. We are therefore concerned about the Application by UMMC. Such a major project merits careful review by DPH regarding the need for the project, the project's impact on health care costs, and its overall impact on health care in the region.

Regarding need, we note that the Applicant cites a shortage of beds in Central Massachusetts. Occupancy at UMMC may be occasionally high, but given the available capacity at its sister hospitals and others in and around Worcester, we question why an expansion is the appropriate approach for the claimed capacity issues.

Further, the proposed project must not increase costs or unnecessarily waste substantial public funds. We respectfully request that you require an independent cost study to calculate the increases in health care spending that would result from the proposed project. It is no secret that UMMC's prices are already higher than those of its competitors as well as its own sister hospitals, and adding higher-cost beds seems counter to the goal we all share of controlling the ever-increasing cost of care. An independent review is essential to measuring the true impact this project will have on payors, employers, the Commonwealth, and—most importantly—patients.

Finally, we urge DPH to scrutinize whether the proposed project would solve the problems that UMMC asserts it will and whether the project will truly improve health outcomes in our communities. That is, we request that you closely examine whether available alternatives exist for any capacity constraints and clinical and operational issues that the project is intended to address.

We are fortunate to have two vibrant, quality health systems in the region. We hope that an independent cost study and a careful review will ensure the continued stable operations of both for the benefit of the communities and patients we serve. Thank you in advance for your attention to these issues and safeguarding health care in our communities.

Sincerely,



R. Joseph Salois (Aug 1, 2022 20:46 EDT)

R. Joseph Salois, Chair, on behalf of the Board of Trustees of Saint Vincent Hospital