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# MIRICK O'CONNELL

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A T T O R N E Y S   A T   L A W

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April 10, 2018

**VIA E-MAIL**

Nora Mann, Esq., Director  
Determination of Need Program  
Department of Public Health  
250 Washington Street  
Boston, MA 02108

Re: Reliant Medical Group, Inc.  
Transfer of Site of Two Magnetic Resonance Imaging ("MRI") Units  
Application Number 17111409-TS

Dear Director Mann:

Reliant Medical Group, Inc. ("Reliant") is providing written notification with regard to a proposed transfer of site (the "Notification") for two magnetic resonance imaging ("MRI") units operated by Reliant. The Notification is submitted in accordance with 105 CMR § 100.745, which sets forth the process for obtaining approval for a transfer of site. This letter provides detailed explanations for the sections of the Notification specified below, which do not fit within the spaces provided in the officially provided form.

**Section 2 – Project Description**

The purpose of the project identified in the Notification is to transfer the site of two MRI units to 5 Neponset Street, Worcester, MA from the current location at 300 Grove Street, Worcester, MA. The new site is only 1.2 miles down the road from the existing site. A map showing the move is attached as Exhibit A.

The Primary Service Area will not change or be altered following the proposed transfer of site. The relocation is designed to enhance patient convenience. The move is part of an overall consolidation of practice sites by Reliant. As a result, the MRI units will be located in the same building as other Reliant providers and services. The new site is also closer to both highway access and public transportation stops.

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No Substantial Change in Service or Substantial Capital Expenditure will result from the transfer of site. No change of the scope of service will occur. Reliant will maintain the same number of MRI units. The total anticipated capital cost associated with the transfer of site for the MRI units is \$1,071,892. That amount is below the current expenditure minimum that would require a full Determination of Need review.

The new site will enable Reliant to operate the MRI units in newly renovated space that incorporates modern design considerations and amenities. The new site will enhance delivery of care to patients

### Section 8.4 – Project Comparison

The following sets forth a detailed comparison of the current and proposed site for the two MRI units as required by Section 8.4. As the comparison demonstrates, the proposed site enhances Reliant's ability to deliver high quality, coordinated, efficient care to patients.

**Gross Square Footage** – The current site has a footprint of 3,325 square feet. The proposed site has a footprint of 2,786 square feet, which is the area dedicated solely to the MRI units.

**Primary Service Area** – The MRI units currently serve the following areas: Worcester County and the broader central Massachusetts community, which covers some pieces of the MetroWest community. The service will not change or otherwise be impacted as a result of the transfer of site. As noted elsewhere, the MRI units are only moving 1.2 miles down the street, which does not materially impact the area served.

**Patient Population (Demographics)** – The current patient population served by the MRI units is any patient age 10 and above. The patient population will not change or otherwise be impacted as a result of the transfer of site. The same patients will continue to be treated by Reliant and access to the MRI units will be easier.

**Patient Access** – Reliant currently operates the MRI units in space leased from Worcester Surgical Center at 300 Grove Street, Worcester, MA. This is the only location where Reliant operates an MRI unit and/or offers MRI services. The current site is open from 6:00 am to 10:30 pm Monday through Thursday, 6:00 am through 6:00 pm on Friday, and 7:30 am through 3:30 pm on Saturday. Patients are typically seen within 48 hours of an order for imaging being entered. Additionally, immediate access is available for patients in emergency situations. The proposed site will provide the same level of patient access from an operational standpoint and could even introduce flexibility since Reliant will own and control the proposed site. No change in the scope of available services will occur.



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Impact on Price – No impact on price in any regard is contemplated or anticipated as a result of the transfer of site.

Total Medical Expenditure – No impact on total medical expenditure is contemplated or anticipated as a result of the transfer of site.

Provider Costs – No impact on provider costs is contemplated or anticipated as a result of the transfer of site. One potential impact could be a reduction in provider cost. As indicated in this notice, Reliant is consolidating operations, which is leading to a reduction in the number of sites, which also translates to less overhead costs from a small number of sites.

Description – The current site housing Reliant's MRI is in the same building as an ambulatory surgery center that is neither owned nor controlled by Reliant. The MRI units are the only services performed by Reliant at the current location. No other Reliant provider is located at the current site. Reliant does not control overall access to or operation of the current site, which rests with the owner of the site.

The proposed site will be located in a new medical office site that is being custom retrofitted by Reliant. Multiple Reliant providers will be co-located at the new site. The MRI units will be located in space dedicated solely to the MRI units. The MRI suite will be accessed through common areas supporting all of the services and operations within the proposed site. The MRI suite will consist of the rooms housing the MRI units, a control room, four patient changing rooms, two patient restrooms, staff areas, and storage areas for supplies needed in connection with running the MRI services. The location of other Reliant providers within the same building is expected to improve patient access to the MRI units, when scanning is appropriate, and reduce travel burdens on patients who previously had to move between sites to access imaging services.

### Conclusion

The proposed transfer of site for the MRI units is part of a broader goal of reimagining Reliant's interactions with its patients by creating a comprehensive, unified patient experience. Reliant is bringing services together as opposed to operating disparate sites that make it less efficient for a patient to access necessary services. In moving toward this goal, Reliant's proposed move of the MRI units will not impact patient cost, access, or otherwise have any anticipated negative impact on patients. The move will enhance patient care, improve efficient delivery of care, and help reduce overall costs to the healthcare system.

**MIRICK O'CONNELL**

Nora Mann, Esq., Director

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If you require any additional information or have any questions about the submission, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Matthew R. Fisher", written in a cursive style.

Matthew R. Fisher

MRF/dcl

**MIRICK O'CONNELL**

Nora Mann, Esq., Director

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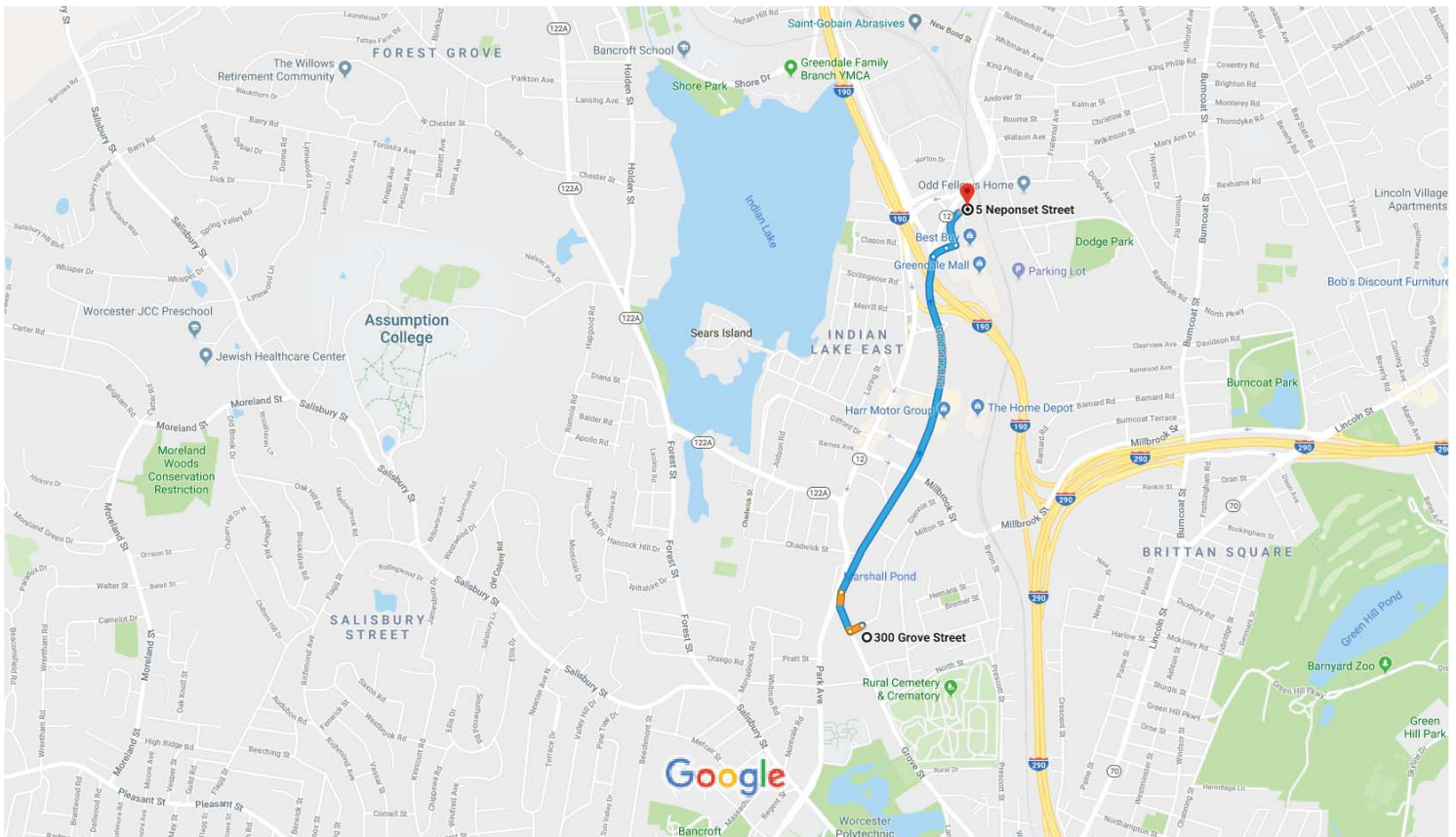
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**Exhibit A**



300 Grove St, Worcester, MA 01605 to 5 Neponset St,  
Worcester, MA 01606

Drive 1.2 miles, 4 min



Map data ©2018 Google 1000 ft



via MA-12 N

Fastest route, the usual traffic

4 min

1.2 miles