



The Commonwealth of Massachusetts
Executive Office of Health and Human Services
Department of Public Health
250 Washington Street, Boston, MA 02108-4619

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April 27, 2018

VIA EMAIL: mfisher@mirrickoconnell.com

Matthew R. Fisher, Esq.
Mirrick O'Connell
100 Front Street
Worcester, MA 01608

RE: Reliant Medical Group, Inc. – Notice of Transfer of Site/Change in Designated Location
Application 17111409 – TS

Dear Mr. Fisher,

We are in receipt of the above-referenced Notice and its accompanying letter, dated April 10, 2018, in which the Applicant, Reliant Medical Group, Inc. (Reliant) provides written notice to the Department of Public Health (the Department) in accordance with 105 CMR 100.745 (the Regulation) for a proposed transfer of site for two magnetic resonance imaging (MRI) units operated by Reliant.

Reliant has complied with the requirements of Notice and has provided information sufficient to allow the Department to make a finding that the proposed transaction will neither result in a Substantial Capital Expenditure or Substantial Change in Service, and thus will not first require a Notice of Determination of Need (DoN).

Background, Reason for Request and Other Required Elements of Notice:

Reliant currently operates two MRI units at 300 Grove Street, Worcester, MA (Grove Street Location) in a space that is leased from Worcester Surgical Center. The MRI units are located in the same building as an ambulatory surgery center that is not controlled or owned by Reliant. The MRI services are the only services provided by Reliant at the Grove Street Location and no other Reliant provider is located there. Reliant indicates that the Grove Street Location is the only the only location where it operates an MRI unit and/or offers MRI services.

The Grove Street Location site is 3,325 square feet. Reliant states that the MRI units serve patients age 10 and older in the Worcester County and broader central Massachusetts community, covering some parts of the Metro West community. Reliant reports the following hours of operation of the two MRI units: 6:00am to 10:30 pm Monday through Thursday, 6:00am through 6:00pm on Friday, and 7:30am through 3:30pm on Saturday. Typically, patients are seen within 48 hours of an order for imaging being entered and immediate access is available for patients in emergency situations.

Description of Proposed Change in Site:

Reliant is proposing to transfer the site of two MRI units from the Grove Street Location 1.2 miles away to 5 Neponset Street Worcester, MA. Reliant states that the transfer of site is part of consolidation of practices that will create a more unified patient experience. Reliant maintains that the new site “enhances Reliant’s ability to deliver high quality, coordinated, efficient care to patients.” The new site will be located in a newly renovated space with modern design considerations and amenities and will be owned and controlled by Reliant. The new site is 2,786 square feet and is located in a new medical office site that is being custom retrofitted by Reliant. The cost of the buildout of the new location is \$1,071,892.00.

Reliant states that multiple providers will be co-located at the new medical office site and the MRI units will be accessible through common areas supporting all of the services and operations of the proposed site. Reliant reports that the MRI suite will include rooms to house the MRI units, a control room, patient changing rooms and restrooms, staff areas, and storage areas for supplies. There will be no change in the scope of services.

Reliant states that the primary service area, patient population, and patient access will not be impacted by the transfer of site. Additionally, the new site will improve access due because it is controlled by Reliant and because of the new site’s proximity to the highway and to public transportation stops. The transfer will not have an impact on price, total medical expenditures (TME) and provider costs and could potentially reduce provider costs through consolidating operations.

Findings:

The Department finds that Reliant has provided the Department with the information required in 105 CMR 100.745(D) including: the rationale for the transfer; description of the current and proposed Sites and patients served; the potential impact upon price, TME, provider costs, and other recognized measures of health care spending; an attestation of anticipated expenditures to be incurred as a result of the proposed transfer of Site; and an affidavit of truthfulness.

Based upon review of the Notice and supporting materials, the Department finds that this transaction does not require a DoN either as a Substantial Capital Expenditure or Substantial Change in Service, pursuant to 105 CMR 100.730 and Reliant may move forward with the proposed changes in designated location.

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Sincerely,

A handwritten signature in dark ink, appearing to read 'MBH', is positioned above the printed name and title.

Monica Bharel, MD, MPH
Commissioner

CC: N. Mann
R. Rodman
S. Lohnes
D. Gent