



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

CHARLES D. BAKER
Governor

KARYN E. POLITO
Lieutenant Governor

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Secretary

MARGRET R. COOKE
Commissioner

Tel: 617-624-6000
www.mass.gov/dph

DATE: March 11, 2022
VIA EMAIL: carol.roosa@heywood.org
Carol Roosa
VP, Operations & CIO
Heywood Healthcare, Inc.
242 Green Street
Gardner, MA 01440

RE: Heywood Healthcare, Inc. — Notice of Transfer of Site Application # HH-22022219-TS

Dear Ms. Roosa:

We are in receipt of the above-referenced Notice and its accompanying attachments, dated Feb. 1, 2022, in which Heywood Healthcare, Inc. (HHI) provided written notice to the Department of Public Health (the Department) in accordance with 105 CMR 100.745 for a proposed transfer of site of one (1) MRI scanner from HHI's hospital in Athol (Athol Hospital) to its hospital in Gardner (Heywood Hospital). HHI has complied with the Notice requirements 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 nor Substantial Change in Service, and thus will not first require a Notice of Determination of Need (DoN).

The proposed transfer of site involves two of HHI's facilities: Athol Hospital (Athol) and Heywood Hospital (Heywood). HHI currently has an MRI scanner located at Heywood (242 Green St., Gardner) and one located at Athol (2033 Main St., Athol). The Applicant seeks to relocate the right to operate an MRI scanner currently located at Athol to Heywood.

Reason for Request:

Due to its proximity to construction for its surgical pavilion project, Heywood plans to discontinue use of an MRI located on its campus this winter/spring. This MRI is adjacent to a recently discovered ledge that will be blasted/drilled away as part of this construction. Heywood has been advised that this blasting/drilling could cause equipment damage, reduced MRI quality, and/or interruptions to patient care (proximity to blasting would require pauses in service throughout the day). Blasting is scheduled to begin in late March, and the current MRI unit is anticipated to be decommissioned around April 11.

The MRI currently at Heywood is operated by Heywood and Alliance Imaging. However, Heywood's

relationship with Alliance Imaging will be terminating soon, and an MRI operated by Shields PET-CT is expected to come online at Heywood this fall. This leaves a gap, during which Heywood would have no MRI scanner, between when the Alliance MRI unit will go offline and when the Shields PET-CT unit will arrive. HHI proposes to cover this gap by moving to Heywood a mobile MRI unit (also operated by Alliance) that is currently in use part-time at Athol.¹ The Athol unit, which will be sited at a part of the Heywood campus sufficiently removed from construction, will be used only until the Shields unit comes online.

Location and Location Change:

The Athol Hospital MRI unit is housed in an MRI trailer on a 410 square foot pad adjacent to the emergency and imaging departments. Upon its move (about a 20-minute drive away) to Heywood, the MRI would be housed on a similar pad, also adjacent to the emergency and imaging departments. Athol's primary service area comprises Athol, Erving, New Salem, Orange, Petersham, Phillipston, Royalston, Warwick, and Wendell (the northwestern section of Worcester County and the eastern section of Franklin County), while Heywood's primary service area comprises Gardner, Hubbardston, Fitchburg, Leominster, Lunenburg, Ashburnham, Ashby, Townsend, Templeton, Winchendon, Westminster (the northeastern section of Worcester County and the northwestern section of Middlesex County).

Patient Population Served:

According to HHI's application, the Athol MRI unit currently serves only outpatients and has minimal demand. Upon relocation of the unit to Heywood Hospital, Athol patients and patients in Athol's primary service area are expected to have timely access to the unit at Heywood where the demand for MRI is higher.

Impact on Health Care Spending:

The applicant states that the Proposed Transfer is not expected to adversely impact the price of MRIs, total medical expenditures, provider costs, or other recognized measures of health care spending.

Project Cost:

In its application narrative, HHI states that costs associated with the proposed transfer of site (specifically, dedicated electrical wiring, construction of a temporary enclosure from the MRI trailer to the hospital, and placement of a temporary pad under the trailer) total approximately \$60,000.

Sufficient Interest in the Proposed Site:

HHI owns the site on which Heywood is located. The applicant confirms that the site is appropriately zoned for the delivery of MRI services. Indeed, the applicant currently operates an MRI on the property.

Findings:

The Department finds that HHI has provided the Department with the information required in

¹ Upon implementation of the Project described in DoN #21021213_HS, MRI services will not be offered at Athol, and will be available at Heywood. Currently, the MRI at Athol serves five to six MRI patients per day—about 800 patients in 2019, when the Athol MRI operated three days a week—with a very minimal number of non-urgent inpatients requiring MRI (typically 0-2 patents per month) who are now transferred to Heywood for inpatient MRI. Conversely, the Heywood Hospital MRI performed about 4,000 MRIs in 2019.

105 CMR 100.745(D). 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 that HHI may move forward with the proposed changes in the designated locations.

Sincerely,

A handwritten signature in black ink that reads "Margret R. Cooke". The signature is written in a cursive style with a large initial "M".

Margret R. Cooke
Commissioner