

Emerson Endoscopy & Digestive Health Center
DoN #EDHC-25021711-AS

APPLICANT RESPONSES #2

Responses should be sent to DoN staff at DPH.DON@State.MA.US

While you may submit each answer as available, please

- List question number and question for each answer you provide
- Submit responses as a separate word document, using the above application title and number as a running header and page numbers in the footer
- When providing the answer to the final question, submit all questions and answers in one final document
- Submit responses in WORD or EXCEL; only use PDF's if absolutely necessary. If "cutting and pasting" charts, provide them in a PDF so they can be clearly seen
- **Whenever possible, include a table with the response**
- **For HIPAA compliance Do not include numbers <11.**

Factor 1a: Patient Panel Need

1. Please provide the Center's payer mix using the table below.

Payer	2022	2023	2024
Commercial Medicare (Private Medicare/Medicare Advantage)	11%	11%	4.78%
Medicare FFS	20%	15%	12.17%
Managed Medicaid (Private Medicaid/Medicaid MCOs)	4%	0%	0.34%
MassHealth	4%	1.4%	1.56%
Commercial (PPO/Indemnity and HMO/POS)	60%	72.6%	80.73%
Other	1%	0.5%	0.36%
Total % (must=100%)	100%	100%	100%

2. Responses to DoN Questions #1 provide an explanation of the decrease in Medicaid patients and increase in Commercial patients in the Center's payer mix.

a. Explain the reason for the decrease in Medicare (Medicare and Commercial Medicare) in the Center's payer mix.

The Medicare payer mix decreased in proportion to the increased volume of patients under the age of 65 who are not eligible for Medicare. These patients are largely commercially insured, thus the corresponding increase in commercial payer mix.

The payor shift between governmental payors and commercial payors is correlated with a shift in the age of the ASC's patient population, most likely attributable to a recent change in colorectal cancer screening guidelines and increased incidence and awareness of colorectal cancer among young people.

Prior to 2021, the U.S. Preventive Services Task Force ("USPSTF") recommended screening patients aged 50 to 75 for colorectal cancer. However, in 2021, USPSTF expanded its recommended ages for screening to 45 to 75 years old.¹ Additionally, there has been a marked increase in colorectal cancer diagnoses in

¹ USPSTF, Colorectal Cancer: Screening (May 18, 2021), available at <https://www.uspreventiveservicestaskforce.org/uspstf/recommendation/colorectal-cancer-screening..>

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people aged 18-50 since the early 2000s.² This has led to more calls for screenings for younger people exhibiting potential signs of colon cancer.³ Moreover, the increased incidence of colon cancer among young people has caught traction in the national media in the past two years,⁴ increasing awareness of the signs of colon cancer and the need for screenings. At the same time, the updated USPSTF guidelines have been gradually trickling through to patients between the ages of 45 and 50, as those patients learn that they should now seek screenings.

All of this has led to a significant shift in the age of the ASC's patient population. Between 2022 and 2024, the population aged 18-44 has shifted from 13.5% of the ASC's population to 18.3%, while the population aged 45-49 has shifted from 10.2% of the ASC's population to 17.9%. Meanwhile, the traditional Medicare population of patients 66 and older has decreased from 30.9% to 20.8%. This has corresponded to an associated decrease in the portion of the ASC's population that uses governmental versus commercial insurance.

Finally, the ASC has become a participating provider with additional commercial insurers since 2022 in an effort to increase access to care. This has also resulted in an increase to the commercial portion of the ASC's population.

3. Provide a breakdown of the ownership structure of the Center.

Emerson Endoscopy and Digestive Health Center, LLC is jointly owned by Emerson Health and Physicians Endoscopy, LLC.

4. The application states that the affiliation with Atrius results in approximately 45 cases per month at the Center. For 2025, this rate is expected to grow to approximately 75 cases per month and increase steadily in future years.

a. When did the affiliation with Atrius begin?

December 2022

b. To what does the Applicant attribute the increase in Atrius cases from 45 per month to 75 per month in 2025?

Atrius hired an additional provider who has requested block time at the Center beginning in August 2025.

5. Responses to DoN Questions #1 states that Atrius has a backlog of cases, and Atrius providers have requested additional procedural block time at the Center, but the Center does not have additional block time to offer to Atrius providers at this time.

a. How many of the Center's existing providers are Atrius providers and how many are Emerson providers?

There are six existing Emerson providers and three existing Atrius providers.

² See American College of Surgeons, Colorectal Cancer Awareness Month: What to Know about the Rise of Colorectal Cancer in Younger Adults (March 5, 2024), available at <https://www.facs.org/media-center/press-releases/2024/colorectal-cancer-awareness-month-what-to-know-about-the-rise-of-colorectal-cancer-in-younger-adults..>

³ National Cancer Institute, Study Identifies Potential Warning Signs of Colorectal Cancer in Younger Adults (June 15, 2023), available at <https://www.cancer.gov/news-events/cancer-currents-blog/2023/colorectal-cancer-young-people-warning-signs>.

⁴ See Krvul Sheikh, More Young People Than Ever Will Get Colorectal Cancer This Year (N.Y. Times March 27, 2024), available at <https://www.nytimes.com/2024/03/27/well/colon-cancer-symptoms-treatment.html>; Dennis Thompson, Colon Cancer Rates Are Up Among the Young Worldwide (U.S. News Dec. 16, 2024), available at <https://www.usnews.com/news/health-news/articles/2024-12-16/colon-cancer-rates-are-up-among-the-young-worldwide>; Allison Aubrey, Colorectal cancer is rising among Gen X, Y & Z. Here are 5 ways to protect yourself (NPR March 20, 2023), available at <https://www.npr.org/sections/health-shots/2023/03/20/1163697875/colon-cancer-signs-screening-young-adult>.

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b. What is the existing block time for Atrius Providers and for Emerson Providers?

Operating Day	Room 1	Room 2
Monday	Emerson	Emerson
Tuesday	Emerson	Atrius: 1st & 3 rd ; Emerson: 2 nd , 4th & 5th
Wednesday	Emerson	Atrius
Thursday	Emerson	Emerson
Friday	Emerson	Emerson

6. Does the Applicant have any data on the number of former Nashoba Valley Medical Center patients that have been treated at the Center since the Hospital's closure?

No. Data received by the Center via the booking sheet only includes patient information and the physician performing the case. The Center does not receive historical information that would indicate if the patient was a former NVMC patient.

7. The Original DoN approval for the Center stated that the ASC would address Patient Panel need for endoscopy services by shifting clinically appropriate cases from Emerson Hospital to the Center.

a. Provide data to demonstrate the Center's effectiveness in shifting cases from Emerson Hospital to the Center, since the Center's operations began in 2022.

As illustrated in the table below, the majority of endoscopy cases have shifted over time to be performed at the Center compared to when the ASC first opened and the majority of cases were performed at the Hospital.

Location	2022 Count	2023 Count	2024 Count	2022 Percent	2023 Percent	2024 Percent
Emerson Hospital	4,363	3,258	3,633	69%	50%	43%
The Center	1,970	3,273	4,873	31%	50%	57%
Total (Routine)	6,333	6,531	8,506	100%	100%	100%

b. How is the procedural volume at Emerson Hospital and the Center compared to the projected volume in the Original DoN application?

The Original DoN application projected less total volume than currently exists. Moreover, the Center performed as many cases in Year Three (2024) as it projected to perform in Year Five. Given that the Center performed the majority of routine endoscopy between the two facilities, the Center has met its original objective of shifting appropriate routine cases from the Hospital to the ASC.

c. Provide any data to demonstrate how shifting clinically appropriate cases from Emerson Hospital to the Center is impacting Patient Panel need for the Proposed Project.

The Original DoN projected that total case volume in Year Five would be 5,738. This is just 67% of actual volume demonstrating there is more need for endoscopy in the region than the Original DoN anticipated. Therefore, in order to continue to meet the community's need for endoscopy without creating wait times, additional capacity is needed.

From: [Ciolfi, Kasey](#)
To: [Clarke, Lucy \(DPH\)](#); [Bloom, Crystal](#)
Cc: [DPH-DL - DoN Program](#); [Renaud, Dennis \(DPH\)](#)
Subject: RE: Emerson Endoscopy and Digestive Health Center - DoN Questions #2
Date: Tuesday, July 8, 2025 10:11:26 AM
Attachments: [image001.png](#)
[image002.png](#)

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Hi Lucy,

Please see responses below. Based on where the review is, is there any chance the Applicant will make the August PHC meeting?

1. Please provide the breakdown of Emerson and Physicians Endoscopy's percent ownership interest (of a total 100%) in the ASC.

Emerson: 75%


PE: 25%

2. Please confirm the number of providers at the Center

Responses to DoN Questions #1 mentions 8 providers with privileges at the Center, and Responses to DoN Questions #2

mentions 9 providers (6 Emerson and 3 Atrius)

This was a typo, there are *nine* providers with privileges: six from Emerson and three from Atrius.

Kasey Ciolfi 
Senior Associate
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From: Clarke, Lucy (DPH) <Lucy.Clarke2@mass.gov>

Sent: Tuesday, July 8, 2025 8:37 AM

To: Ciolfi, Kasey <Kasey.Ciolfi@huschblackwell.com>; Bloom, Crystal
<Crystal.Bloom@huschblackwell.com>

Cc: DPH-DL - DoN Program <DPH.DON@MassMail.State.MA.US>; Renaud, Dennis (DPH)
<Dennis.Renaud@mass.gov>

Subject: Re: Emerson Endoscopy and Digestive Health Center - DoN Questions #2

[EXTERNAL EMAIL]

Good morning Kasey,

I have two quick follow-up questions on the responses: