

Mr. Jerry Parks
 Chairman, North Carolina State Health Coordinating Council
 c/o Medical Facilities Planning Branch
 Division of Health Service Regulation
 2714 Mail Service Center
 Raleigh, NC 27699-2714

July 31, 2013

Re: Petition for Adjusted Need Determination for One Fixed MRI Scanner in Bladen County in the 2014 State Medical Facilities Plan

I. Petitioner

Cape Fear Valley Health System
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II. Statement of the Requested Change

Cape Fear Valley Health System (Cape Fear Valley) requests an adjusted need determination for one fixed MRI scanner in Bladen County in the *Final 2014 State Medical Facilities Plan (Final 2014 SMFP)*.

Chapter 9, Magnetic Resonance Imaging, should be changed as follows:

Table 9R: Fixed MRI Scanner Need Determination
(Proposed for Certificate of Need Review Commencing in 2014)

It is determined that the service areas listed in the table below need additional fixed MRI scanners as specified.

Service Areas	Fixed MRI Scanners Need Determination*	Certificate of Need Application Due Date**	Certificate of Need Beginning Review Date
Mecklenburg	1	To be determined	To be determined
Bladen***	1	To be determined	To be determined

* Need Determinations shown in this document may be increased or decreased during the year pursuant to Policy GEN-2 (see Chapter 4).

**Application due dates are absolute deadlines. The filing deadline is 5:30 p.m. on the application due date. The filing deadline is absolute (see Chapter 3).

***This need determination is based on an Adjusted Need Petition.

III. Background Information Regarding Petitioner

A. Bladen County Hospital - History

Located in Elizabethtown, Bladen County Hospital was made possible in part through the generosity of the Honorable James McKay. Through the years, Bladen County Hospital was able to expand and grow without any additional county funds. By 1987, the needs of the hospital were great, and the citizens approved a \$4 million bond issue.

In 2007, Bladen County Hospital requested proposals to partner with the facility. Cape Fear Valley was one of three organizations to submit bids, and the only not-for-profit organization to respond.

In March 2008, Bladen County Commissioners and Cape Fear Valley's Board of Trustees voted to approve a five-year lease of Bladen County Hospital effective June 1. In the years since, the affiliation has brought an influx of improvements to Bladen County, improving health care for all.

On March 19, 2012, Cape Fear Valley officially purchased Bladen County Hospital. The signing fulfills a four-year promise by Cape Fear Valley to purchase the hospital and make annual improvements.

B. Bladen County Hospital Plays a Critical Role in the Provision of Efficient and Effective Health Care to Bladen County Residents

Bladen County Hospital is a modern, up-to-date critical access hospital with a 24-hour emergency department, staffed on a full-time basis with specially-trained physicians and nurses, a Medical-Surgical Unit with 25 staffed beds, an Intensive Care Unit and an up-to-date Birthing Center. The surgical suite and ambulatory surgical section offers the latest in laser and laparoscopic surgery.

The BCH Imaging Department is equipped with the latest technology, such as CT scanner, Nuclear Medicine, Ultrasound, and Mammography. A mobile MRI scanner provides MRI services for patients one day each week.

Various tests can be performed in Cardiopulmonary, including EKG'S, Stress Testing and Holter Monitoring. A Cardiac Rehab program and a Physical Therapy Department provide up-to-date treatments for patients requiring therapy. Laboratory is open 24 hours a day to provide accurate, timely test results.

Bladen Medical Associates has two Family Practice physicians and two Internal Medicine physicians, as well as five physician extenders. It is located two blocks from Bladen County Hospital. Bladen Medical Associates has satellite offices in Bladenboro and Dublin. Bladen Kids' Care offers care to children from newborns through adolescence. Women's Health Specialists offers general and high-risk obstetric care and gynecology at its Elizabethtown office.

Babies are delivered in Bladen County Hospital's modern Birthing Center. Bladen Surgical Specialists offers a full range of general surgery services.

Since its partnership with Bladen County began in 2008, Cape Fear Valley has invested more than \$19 million in upgrades, to include:

- A new roof for Bladen County Hospital;
- Aggressive physician recruitment to bring additional physicians to the county, including pediatricians, general surgeons, OB/GYN physicians, hospitalists, ED physicians, and family practice physicians;
- Bladen Kids' Care opened in Elizabethtown, bringing the first pediatrician to the county in decades;
- Bladen Sleep Center opened to offer in-house sleep studies at Bladen County Hospital;
- Fayetteville Orthopaedics & Sports Medicine opened an Elizabethtown office for greater patient convenience and access;
- Fayetteville cardiologists now performing initial visits and follow-ups through the Bladen Consultation Center;
- Bladenboro Family Practice merger with Bladen Healthcare to offer improved family care services to local residents;
- Bladen County Hospital Birth Center renovations to offer an improved birthing experience for patients;
- Hospitalists working in-house at Bladen County Hospital to care exclusively for hospitalized patients;
- New Mid-Level Provider (Physician Assistant) added to Emergency Department staff to reduce patient wait times;
- Digital Mammography equipment purchased;
- New C-arm X-ray machine purchased for greater diagnostic imaging capability in the Operating Room;
- Bladen Digital Mammography Services received accreditation from the American College of Radiology;
- Bladen County Hospital Lab received accreditation by The Joint Commission on Healthcare Organizations; and,
- Bladen County Hospital named a "Red Apple" hospital by the North Carolina Prevention Partners for its commitment to provide healthy food for employees, patients and visitors.

In May 2012, all three Bladen Medical Associates clinics received Level 3 (highest level) designation as patient-centered medical home programs by the National Committee for Quality Assurance (NCQA). The three-year designation is provided through the Physician Practice Connections-Patient Centered Medical Home (PPC-PCMH) program. It recognizes facilities that use evidence-based, patient-centered processes to address a patient's entire range of health care needs, including disease prevention, early detection and care coordination. Each demonstrated the ability to promote partnerships between patients and their clinicians, instead of emphasizing episodic office visits, which improves patient care quality and efficiency.

In January 2012, Bladen Medical Associates' Bladenboro Clinic moved to a new, state-of-the-art location. Bladen Medical Associates leased the 5,600-square-foot building and renovated it to offer new diagnostic services to area residents. The project is a collaborative effort among the Town of Bladenboro, Bladen's Bloomin Agri-Industrial, Inc., the N.C. Rural Center Foundation, and the Golden Leaf Foundation. The leased space was completely renovated to accommodate the practice's new services, including Obstetrics and Gynecology. A provider from Bladen Healthcare's Women's Health Specialists has scheduled days at the facility. X-rays, ultrasounds, and blood drawing are available at the practice for the first time. Local patients previously had to drive 20 minutes or more to obtain those services.

Bladen County Hospital plays a critical role in providing efficient and effective health care that is on par with its community hospital counterparts in more suburban areas of North Carolina.

IV. Reasons for the Proposed Adjustment

Bladen County is a large sparsely populated rural county in southeast North Carolina. Bladen County is the fourth largest county in the state, with a land area of 875 square miles; population density is only 37 residents per square mile, making it the ninth least densely populated county in North Carolina. These population demographics alone provide unique challenges associated with access to health care services in Bladen County.

Bladen County Hospital is a Critical Access Hospital and has an essential role in providing efficient and effective health care that is on par with its community hospital counterparts in more suburban areas of North Carolina.

A. Bladen County Hospital Mobile MRI Utilization

Bladen County Hospital began providing mobile MRI services almost a decade ago and volumes have fluctuated up and down over the years. CFVHS began managing Bladen County Hospital in 2008 and as a result of physician recruitment to Bladen County during the last three years outpatient and emergency room utilization has increased significantly including mobile MRI utilization as shown in the following table.

**Bladen County Hospital
Mobile MRI Utilization: FYs 2010 – 2012**

Oct-Sept	FY 2010	FY 2011	FY 2012	Three Year Growth Rate
Total MRI Scans on Bladen County Hospital Mobile MRI	274	335	376	37.2%

Source: Planning Branch MRI Facility Reports (FY 2010 and FY 2011); 2013 LRAs and 2013 RIMEFs

During the last three years mobile MRI utilization at Bladen County Hospital has increased 37.2% as shown in the previous table.

The total number of MRI scans performed in Bladen County is consistent with the capacity of MRI mobile service at Bladen County Hospital, which is provided one 8-hour day per week. Due to very limited access to mobile MRI services, Bladen County is unable to experience growth necessary to trigger a fixed MRI need determination using the MRI Need Methodology.

B. Bladen County MRI Scan Use Rate is Significantly Less than the North Carolina MRI Scan Use Rate

Cape Fear Valley reviewed patient origin data reported by hospitals on page 26 of their annual License Renewal Applications (LRA) and freestanding (non-hospital) MRI providers and mobile MRI host sites reported on page 5 of their annual Registration and Inventory Equipment Forms (RIFE) to determine the number of Bladen County residents who received an MRI scan at any location in North Carolina. The following table shows the MRI use rate per 1,000 for Bladen County residents during the last three fiscal years at any imaging location.

**Bladen County
MRI Scan Use Rate per 1,000 Population: FYs 2010 - 2012**

Oct-Sept	FY 2010	FY 2011	FY 2012	Three Year Growth Rate
Total Bladen County MRI Scans	1,664	1,784	1,878	12.9%
Population All Ages	35,171	35,184	35,200	0.1%
MRI Scan Use Rate per 1,000 Population	47.31	50.70	53.35	

Sources: LRA MRI Patient Origin Data; NC OSBM website (county population data last updated 4.18.13)

Total MRI scans performed on Bladen County residents have increased annually over the last three fiscal years resulting in a 13% three year growth rate, as shown in the previous table. Bladen County's total population has increased only 0.1% during this time. As a result, the Bladen County MRI use rate per 1,000 population has increased over the last three fiscal years resulting in 53.35 MRI scans per 1,000 population in FY 2012, as shown in the previous table. The following table shows the North Carolina MRI scan use rate per 1,000 population in the last three fiscal years.

**North Carolina
MRI Scan Use Rate per 1,000 Population: FYs 2010 - 2012**

Oct-Sept	FY 2010	FY 2011	FY 2012	Three Year Growth Rate	Three Year Average
Total MRI Scans	777,609	776,852	788,095	1.3%	
Population All Ages	9,574,477	9,666,068	9,765,229	2.0%	
MRI Scan Use Rate per 1,000 Population	81.22	80.37	80.70	-0.6%	80.76

Sources: 2012 SMFP, 2013 SMFP, Table 9P of the Proposed 2014 SMFP; NC OSBM website (county population data last updated 4.18.13)

Total MRI scans performed in North Carolina over the last three fiscal years has increased by 1.3%, as shown in the previous table. North Carolina's total population has increased at a slightly higher rate than total MRI scans. As a result, the North Carolina MRI use rate per 1,000 population has fluctuated down and up slightly over the last three fiscal years, averaging 80.76 MRI scans per 1,000 North Carolinians during the three year timeframe, as shown in the previous table.

The following table compares the North Carolina MRI scan use rate per 1,000 and Bladen County MRI patient use rate per 1,000 population in the last three fiscal years.

**Comparison:
North Carolina MRI Scan Use Rate per 1,000 Population and
Bladen County Patient Use Rate per 1,000 Population: FYs 2010 - 2012**

Oct-Sept	FY 2010	FY 2011	FY 2012	Three Year Average
North Carolina MRI Scan Use Rate per 1,000				
MRI Scan Use Rate per 1,000 Population*	81.22	80.37	80.70	80.76
Bladen County MRI Patient Use Rate per 1,000				
MRI Patient Use Rate per 1,000 Population**	47.31	50.70	53.35	50.46

* Source: 2012 SMFP, 2013 SMFP, Table 9P of the Proposed 2014 SMFP; NC OSBM website (county population data last updated 4.18.13)

** Source: Planning Branch MRI Facility Reports (FY 2010 and FY 2011); 2013 LRAs and 2013 RIMEFs; NC OSBM website (county population data last updated 4.18.13)

The previous table shows that Bladen County MRI patient use rate per 1,000 population is only 66.2% of the North Carolina MRI scan use rate per 1,000 in FY 2012.

C. Bladen County MRI Out-Migration

Due to the lack of MRI services in Bladen County, most residents of Bladen County must leave the county to receive MRI services in a timely manner. The following table quantifies out-migration by Bladen County residents in the last three years.

**Bladen County
MRI Patient Out-migration: FYs 2010 - 2012**

Oct-Sept	FY 2010	FY 2011	FY 2012	Three Year Growth Rate	Three Year Average
Total MRI Patients who are Residents of the Bladen County	1,664	1,784	1,878	12.9%	
Bladen County Patients who Received MRI Scans in a County other than Bladen	1,439	1,471	1,565	8.8%	
% Out-migration	86.5%	82.5%	83.2%		84.1%

Source: Planning Branch MRI Facility Reports (FY 2010 and FY 2011); 2013 LRAs and 2013 RIMEFs

Many patients do not wish to wait a week for their MRI study. As shown in the previous table, during the last three fiscal years, over 80% of Bladen County residents received MRI scans at locations other than Bladen County Hospital. Residents did so for one or more of the following reasons:

- They were not able to be scheduled at Bladen County Hospital during its one day per week of mobile MRI service.
- Their physicians referred them to a hospital or freestanding MRI facility that operates a fixed scanner.
- They preferred to be scanned using a fixed scanner.
- Bladen County Hospital had to transfer an inpatient to another hospital for a fixed MRI scan.

Bladen County residents have a need for increased access to MRI services in the Bladen County, which access is only achievable with a full-time, fixed MRI scanner. In FY 2012, over 65% of Bladen County residents received MRI services at other facilities in Robeson, Columbus, New Hanover, and Cumberland Counties as shown in the following table.

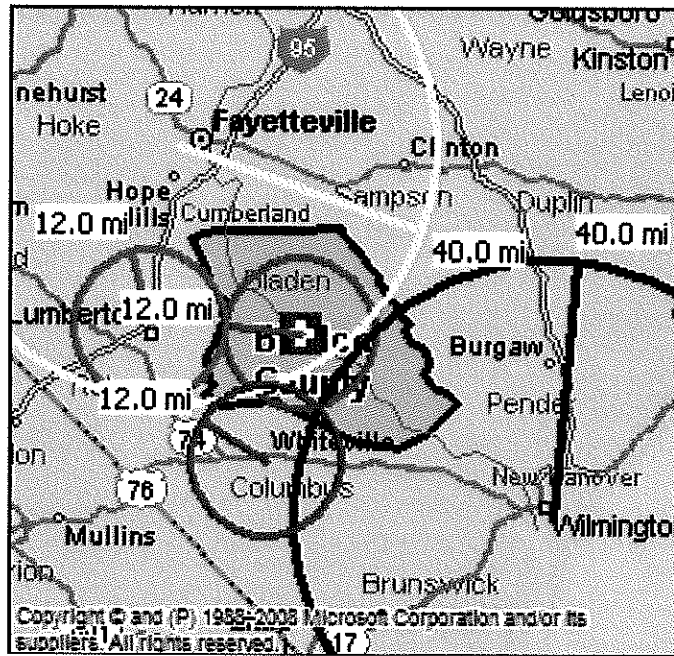
**Bladen County Market Share
FY 2012**

All Providers	County	MRI Volume	Market Share	County Market Share
Bladen County Hospital	Bladen	376	20.0%	20.0%
Southeastern Regional Medical Center	Robeson	472	25.1%	25.1%
New Hanover Regional Medical Center	New Hanover	139	7.4%	
Delaney Radiologists Wilmington	New Hanover	14	0.7%	
OrthoWilmington	New Hanover	58	3.1%	
Delaney Radiologists Porters Neck Imaging	New Hanover	34	1.8%	13.0%
Columbus Regional Healthcare System	Columbus	117	6.2%	
Columbus Regional Diagnostics (Waccamaw Imaging)	Columbus	113	6.0%	12.2%
Cape Fear Valley Medical Center	Cumberland	109	5.8%	
Valley Regional Imaging	Cumberland	101	5.4%	
Carolina Imaging of Fayetteville	Cumberland	86	4.6%	15.8%
Subtotal (With Bladen County and Without Bladen County)		259	86.2%	66.2%
All Other Providers		1,878	13.8%	

Source: Planning Branch MRI Facility Reports (FY 2010 and FY 2011); 2013 LRAs and 2013 RIMEFs

As shown in the previous table, 66.2% of Bladen County residents are travelling to nearby counties for MRI services. As shown in the following map, Bladen County Hospital in Elizabethtown is closer to all residents of Bladen County and residents must travel 40 miles or more to seek care at New Hanover and Cumberland County locations. A fixed MRI in Elizabethtown would improve access to MRI services for all residents of Bladen County.

Bladen County Hospital and Surrounding MRI Locations



While 86% of total Bladen County MRI volume was provided by the 11 providers identified in the previous table, over 35 different providers across North Carolina provided at least one MRI to a resident of Bladen County in FY 2012. Bladen County Hospital provided 20% of total MRIs scans for Bladen County residents. Of the remaining 80%, nearly 70% were provided by outpatient hospital locations.

D. Bladen County Demographics

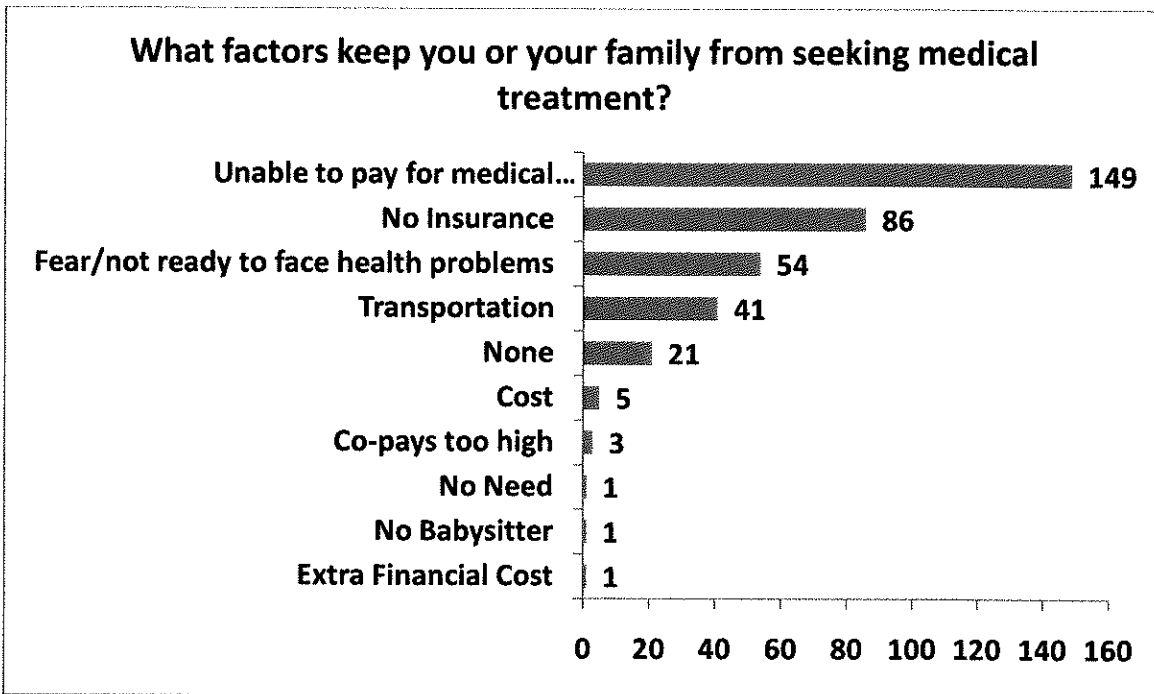
Bladen County is a poor county as reflected in the following table.

Bladen County Demographics Compared to North Carolina

Metric	Timeframe	Bladen County	North Carolina
Per Capita Income	2011	\$18,350	\$25,256
Median Household Income in	2007-2011	\$30,273	\$46,291
Persons below Poverty	2007-2011	23.6%	16.1%

Source: US Census Bureau & North Carolina State Center for Health Statistics, 2011

Bladen County Hospital has recently completed a Community Health Needs Assessment. One part of this process was a community survey. As illustrated below the inability to pay, the lack of health insurance and the lack of transportation have impacted the utilization of health services in Bladen County. Many BCH's patients have transportation issues, and often cannot secure transportation to other locations for an MRI. A fixed MRI in Bladen County would eliminate the transportation barriers for these patients.



The above graph illustrates the number of the population surveyed who feel that the stated factors are what their community lacks funds for that impact healthcare. As shown the top three factors are: 1) Health Insurance, 2) Medicine, and 3) Transportation

Bladen County is a Critical Access Hospital designated as such to serve the residents of this large rural county. Improving access to healthcare services is the mission of Bladen County Hospital.

E. MRI Utilization by Bladen County Residents is Sufficient to Generate a Need Determination for One Fixed MRI Scanner

The MRI Need Methodology includes need thresholds arranged in tiers based on the number of scanners, weighting of procedures based on complexity, and a component addressing MRI service areas that have no fixed MRI scanners, but have mobile MRI scanners serving each service area. The MRI Need Methodology is based on fixed MRI scanners and procedures performed on mobile MRI scanners in the MRI service areas. In addition, equivalent values for the mobile MRI scanners in the service areas are found in the column labeled “Fixed Equiv” in Table 9P of the *Proposed 2014 SMFP*.

The MRI Need Methodology sets a 1,716 adjusted total procedure threshold for service areas that do not have a fixed MRI scanner. When the service area average procedure per MRI scanner is greater than one equal to the service area adjusted threshold, a need is determined for one fixed MRI scanner in that service area.

The need for a fixed MRI scanner in Bladen County based upon FY 2012 historical data is calculated in the following table. The following calculation is based on limited access residents

of Bladen County currently have to this service. As discussed above, over 80% of Bladen County residents must leave Bladen County to receive a MRI scan in a timely manner. Mobile services are available only one time per week.

**Bladen County
Fixed MRI Scanner Need: FY 2012**

Bladen County	FY 2012
Total MRI Patients	1,878
Average Weight per MRI Scan	1.067
Average MRI Procedures per Fixed Equivalent Magnet	2,004
MRI Utilization Threshold for County with no fixed MRI	1,716
Fixed MRI Needed at 1,716	1.2

Average weight per MRI scan was determined by dividing the Bladen County's weighted MRI scan volume (412) by the total number of scans performed in FY 2012 (376) from Table 9P of the *Proposed 2014 SMFP*.

However, Bladen County is underserved as evidenced by the large discrepancy between the Bladen County MRI use rate and the North Carolina MRI use rate. To calculate future MRI need for residents of Bladen County in 2017, CFV Bladen County Hospital utilized both the FY 2012 MRI use rate for Bladen County and the FY 2012 MRI use rate for North Carolina and held the use rate constant. The following table compares the two methodologies.

**Bladen County Residents
Expected Need for Fixed MRI Equipment: 2017**

	Bladen County MRI Use Rate	North Carolina MRI Use Rate
Population All Ages 2017	35,331	35,331
MRI Patient Use Rate 2012 (Held Constant)	53.35	80.70
Expected MRI Patients	1,887	2,851
Average Weight per MRI Scan	1.067	1.067
Expected Average MRI Procedures per Fixed Equivalent Magnet	2,011	3,042
MRI Utilization Threshold for County with no fixed MRI	1,716	1,716
Fixed MRI Needed at 1,716	1.2	1.8

As shown in the previous table, expected MRI patient volume in FY 2017 is sufficient to generate a need determination for more than one fixed MRI scanner in FY 2017 for residents of Bladen County.

Cape Fear Valley requests an adjusted need determination for one fixed MRI scanner in Bladen County in the *Final 2014 SMFP*.

F. Rural Counties with One Fixed MRI Scanner have Far Lower Out-migration than Bladen County

As shown in the following table, 13 of the 14 counties with one fixed MRI scanner have far lower out-migration than Bladen County. Please note that none of the 14 counties had mobile MRI service in FY 2012.

**Comparison
Counties with One Fixed MRI Scanner
Lower Out-Migration than Bladen County: FY 2012**

County	MRI Scans in County			Total County Residents Scanned			
	MRI Scans	Adjusted Total	Fixed Equivalent	Total Patients	Out-migration	Population All Ages	County MRI Use Rate
Franklin	988	1,184	1.00	3,765	83.3%	61,840	60.88
Bladen	386	412	0.22	1,817	82.7%	35,200	51.62
Ashe	860	1,035	1.00	2,415	66.4%	27,361	88.26
Edgecombe	1,836	2,243	1.00	3,284	64.6%	56,085	58.55
Stanly	2,838	3,328	1.00	4,821	64.3%	60,477	79.72
McDowell	1,238	1,387	1.00	2,950	62.2%	45,288	65.14
Lee	2,496	3,044	1.00	4,583	58.9%	59,111	77.53
Sampson	1,905	2,064	1.00	3,240	53.0%	64,151	50.51
Wilkes	2,697	3,047	1.00	5,334	52.0%	69,755	76.47
Mitchell	1,182	1,333	1.00	1,183	47.5%	15,396	76.84
Rutherford	2,909	3,473	1.00	3,918	41.5%	67,932	57.68
Cherokee	1,725	1,921	1.00	1,743	34.6%	27,030	64.48
Transylvania	1,987	2,217	1.00	2,672	32.5%	33,022	80.92
Hertford	2,008	2,453	1.00	1,293	32.4%	24,451	52.88
Chowan	1,668	1,894	1.00	827	26.8%	14,743	56.09
Average	1,881	2,187	1.00	3,002	51.4%	44,760	67.07

Source: NC OSBM website; data last updated 4.18.13; Table 9P of the Proposed 2014 SMFP; Planning Branch MRI Facility Reports (FY 2010 and FY 2011); 2013 LRAs and 2013 RIMEFs

As shown in the previous table, rural counties with a fixed MRI scanner have an average out-migration of 51.4%, compared to the more than 80% outmigration from Bladen County (82.7%). Residents choose to remain in their home county when fixed MRI services are available to them and their physicians.

Also important, 10 of the 14 counties with one fixed MRI scanner have adjusted total MRI volumes that exceed the planning threshold of 1,716 necessary for a county, like Bladen County, with no fixed MRI scanner to show a need for a fixed MRI scanner. That volume can only be generated with a full-time, fixed MRI scanner.

G. Six Rural Counties with a Lower Population than Bladen County have a One Fixed MRI Scanner

The following table is an excerpt from the table in Subsection E., which shows 6 counties with one fixed MRI scanner with a smaller population than Bladen County. In FY 2012, population in those 6 counties ranged from 14,743 to 33,022 persons.

**Comparison
Counties with Populations Smaller than
Bladen County with One Fixed MRI Scanner: FY 2012**

County	MRI Scans in County			County Residents Scanned		
	MRI Scans	Adjusted Total	Fixed Equivalent	Total Patients	Out-migration	Population All Ages
Bladen	386	412	0.22	1,817	82.7%	35,200
Ashe	860	1,035	1.00	2,415	66.4%	27,361
Mitchell	1,182	1,333	1.00	1,183	47.5%	15,396
Cherokee	1,725	1,921	1.00	1,743	34.6%	27,030
Transylvania	1,987	2,217	1.00	2,672	32.5%	33,022
Hertford	2,008	2,453	1.00	1,293	32.4%	24,451
Chowan	1,668	1,894	1.00	827	26.8%	14,743
Average	1,572	1,809	1.00	1,689	40.0%	23,667

Source: NC OSBM website; data last updated 4.18.13; Table 9P of the Proposed 2014 SMFP

Three of the above six counties have Critical Access Hospitals in the county as their sole inpatient provider. Bladen County's out-migration percentage (82.7%) is more than twice the average out-migration percentage of all 6 counties (40.0%), as shown in the previous table.

The previous table also shows that in FY 2012, 4 of the 6 counties had an "Adjusted Total" MRI volume exceeding the 1,716 planning threshold for a county to show a need for one fixed MRI.

Only Ashe Memorial Hospital and Blue Ridge Regional Hospital, both of which are located in the rural mountains of North Carolina, had an "Adjusted Total" MRI volume lower than the 1,716 planning threshold in FY 2012.

Ashe Memorial Hospital was approved to acquire its first fixed MRI scanner on November 21, 2008¹ in response to an adjusted need determination in the 2008 SMFP. The GE Signa HDe 1.5 8-channel fixed MRI system became operational during FY 2010. FY 2012 is only the second full year of operation of the fixed MRI scanner, which is available 6 days per week.

In mid-November 2012, Blue Ridge Regional Hospital in Mitchell County began renovation and construction on a new home for its orthopedic and sports medicine practices. Renovations are expected to be completed by spring 2013.² Blue Ridge Regional Hospital's fixed MRI services are integral to its orthopedic and sports medicine practices.

¹ <http://www.ncdhhs.gov/dhsr/coneed/archive/pdf/2008/121908report.pdf>

² <http://www.blueridgehospital.org/news/article/blue-ridge-regional-hospital-expands-orthopedic-practice-0>

It is reasonable to expect that more residents of Ashe and Mitchell counties, respectively, will choose to have their MRI scans at the community hospital, and each hospital's adjusted total volume will increase proportionally.

H. Orthopedic Utilization and MRI at Bladen County Hospital

Orthopedic surgeons at BCH have expressed concern regarding the limited availability of the MRI unit to one day per week, and the limitations of the BCH radiologist, who is a "generalist" and not fellowship trained in musculoskeletal MRI imaging interpretation. The Orthopedic surgeons have expressed a desire to have MRI's interpreted by a fellowship-trained radiologist, and often refer their patients elsewhere because Bladen cannot provide this specialized level of MRI interpretation. The fixed unit would allow BCH to recruit a fellowship-trained musculoskeletal radiologist to recapture the patients leaving the service area.

The installation of a fixed MRI unit would allow for faster imaging turnaround times, and higher quality interpretations. The orthopedic surgeons on the BCH staff would resume referring patients to Bladen for MRI studies because the trust of the imaging interpretation and quality will be restored. Patients who are currently traveling to Columbus County or Robeson County will no longer have to do so, which represents additional volume.

I. Emergency Department Utilization of MRI

The use of CT and MRI scans for injury-related emergency room visits in the United States has tripled since 1998. Of 324,569 emergency department visits between 1998 and 2007, 20% were injury-related, the researchers found. Of 5,237 sample injury-related visits in 1998, 6% of the patients received an MRI or CT. By 2007, 15% of 6,567 patients sampled had scans.

While the increase in the likelihood of getting a CT or MRI scan during visits to emergency departments has not resulted in corresponding increase in the likelihood of diagnosing life-threatening injuries during those visits. The technological ability to provide CT and MRI provides assurance that the ER physician has made a correct diagnosis, reduces the wait time and uncertainty anxiety for the patient, and reduces health-care costs.

Reporting a negative medical imaging procedure, such as, being able to tell patients that they definitively do not have an intracranial hemorrhage, is invaluable, according to Dr. Uppot, director of the Abdominal Imaging Fellowship Division at Massachusetts General Hospital in Boston. In addition, ER doctors are under pressure to get patients discharged as quickly as possible according to Uppot. By ordering an imaging test, doctors think they can get a quicker diagnosis and move the patient out of the emergency department faster, he said.³

Currently, patients admitted to the BCH hospital inpatient unit, or the Emergency Department, cannot be scheduled for an MRI during their stay, and instead must be transferred or scheduled

³ <http://www.healthleadersmedia.com/content/TEC-257478/CT-MRI-Use-in-Emergency-Department-Soaring>

as an outpatient, thus delaying the diagnosis and treatment of a potential medical condition. An onsite, fixed MRI will allow our physicians to provide efficient, quality care.

J. There is Precedent to Support an Adjusted Need Determination in Bladen County

In July 2007, Ashe Memorial Hospital, a Critical Access Hospital, submitted a Petition for an Adjusted Need Determination for one fixed MRI scanner in Ashe County. Ashe Memorial documented the following reasons for its request for an adjusted need determination:

- Due to limited mobile access, the hospital is “sometimes unable to meet the diagnostic imaging needs of its inpatients and must transfer them to another facility located in another county, further from their home.”
- Ashe County has a “very high percent of patient emigration seeking available MRI services outside the county.”
- The “relatively low MRI use rate in Ashe County is indicative of a lack of access to service and of the need for increased access via a full-time fixed MRI scanner at the hospital.”
- “Given the limited access to mobile MRI services and the inability to increase mobile availability, it is virtually impossible for [Ashe Memorial Hospital] to experience growth necessary to trigger a fixed MRI need determination using the standard methodology.”
- “Mobile MRI services are not the most effective option from an operational or patient perspective.”

Like Bladen County Hospital, Ashe Memorial Hospital “has a remarkably sophisticated level of care” for a critical access hospital in a rural county.

At its September 26, 2007 meeting, the SHCC voted to include an adjusted need determination for a fixed MRI scanner for the Ashe MRI Service Area. Ashe Memorial Hospital was approved to acquire its first fixed MRI scanner on November 21, 2008⁴ in response to an adjusted need determination in the *2008 SMFP*. The fixed MRI became operational in FY 2010.

Ashe Memorial Hospital’s Petition was based on factors very similar to the factors discussed in this Petition.

Cape Fear Valley Bladen County Hospital requests that that Technology and Equipment Committee and SHCC, respectively, act consistently with its well-reasoned precedent.

V. Statement of Adverse Effects on the Population

There would be no adverse effect on Bladen County population from the addition of a need determination for one fixed MRI scanner in the *2014 SMFP*. In fact, there are only positive effects on Bladen County population from the addition of a need determination for one fixed MRI scanner in the *2014 SMFP*.

⁴ <http://www.ncdhhs.gov/dhsr/coneed/archive/pdf/2008/121908report.pdf>

Many residents choose to stay in Bladen County for their health care whenever possible. Unfortunately, many residents choose not to stay in Bladen County for an MRI scan. In FY 2012, of the 1,880 Bladen County patients who had an MRI scan, only 313 patients chose to remain in Bladen County for a mobile MRI scan at Bladen County Hospital.

Most Bladen County residents live a one-way travel time of 30 – 60+ minutes from the nearest fixed MRI scanner equipment. The nearest fixed MRI scanners are in Columbus and Robeson counties, approximately 30 minutes from Bladen County Hospital. Other providers with fixed MRI scanners in Cumberland and New Hanover counties are an hour or more from Bladen County.

Given the frequency of demand for MRI scans, it is unreasonable for residents of Bladen County to travel to another county.

The addition of a need determination for one fixed MRI scanner will decrease out-migration for MRI services, and improve access to MRI services in the Bladen County.

VI. Statement of the Alternatives Considered

A. Maintain the Status Quo – Mobile MRI Services in Bladen County

Mobile Imaging of North Carolina provides Bladen County Hospital with quality mobile MRI equipment for which Bladen County Hospital is appreciative. Mobile service, however, is at best, an interim solution. Mobile service is inefficient, adds overhead, and is always at risk of a truck breakdown and/or damage to the equipment on the road. It can compromise patient privacy during transport to and from the mobile unit. The scanning rooms in mobile trailers may be smaller than the scanning rooms at fixed sites so more patients may experience claustrophobia.

Bladen County Hospital's patients are treated in a space that is physically outside the hospital. Patients are exposed to the elements while being transported between hospital and mobile unit. The service is not available every day. Patients get sick every day, and patients need access to MRI services every day.

Bladen County Hospital has a single-day per week mobile MRI service. Any time that a mobile service nears its capacity, scheduling becomes increasingly difficult. Patients become frustrated, physicians become frustrated, which results in more referrals to other counties. Patient word of mouth is powerful. The more patients that must be referred to providers outside of Bladen County, the more other patients choose to seek service out of Bladen County. Bladen County Hospital can relieve capacity and scheduling constraints by adding another day. That, however, would result in a vicious cycle - ease scheduling for a period, utilization increases, requiring additional days. Then, capacity/scheduling issues once again force referrals to fixed MRI providers outside of Bladen County to the frustration of patients and their physicians.

The successful mobile MRI experience of Bladen County Hospital, the demand for MRI services documented in this Petition and letters of support for this Petition document that Bladen County has and can sustain the volume required by a fixed MRI scanner.

For those reasons and for the reasons stated in this Petition, maintaining the status quo in Bladen County is not acceptable.

B. Expand Mobile Services in Bladen County

As discussed above in Section A. mobile service, is at best, an interim solution. Mobile service is inefficient, adds overhead, and is always at risk of a truck breakdown and/or damage to the equipment on the road. It can compromise patient privacy during transport to and from the mobile unit. The scanning rooms in mobile trailers may be smaller than the scanning rooms at fixed sites so more patients may experience claustrophobia. Expanding mobile services would not address these issues.

In addition, the MRI vendor's ability to expand and offer more days is limited at this time. Only one day is available to Bladen given the vendor's limitations. While, multiple days could offer an opportunity for a discount in the "per day" fee to the facility, the discount is minimal, and overtime fees at \$400 per hour would still apply. The vendor has not offered to upgrade the equipment at this time; therefore this is not an option at this time.

Further, the cost of expanding Mobile MRI services is a less attractive financial alternative for BCH. BCH's current cost to lease a Mobile MRI is nearly equivalent to MRI revenues generated leaving BCH with a very vulnerable operating margin. Adding additional days to the current contract has been evaluated but will not result in improved operating margins as the cost of leasing for an additional day is almost equivalent to the revenues received. In addition if BCH adds a second day per week to the lease, BCH will pay in lease cost over the course of three years what they could have paid to purchase an MRI. Since the life of an MRI is approximately 7 years, BCH will have paid more than twice what they would have paid for a fixed MRI to be available at BCH for 7 years, 7 days per week.

The installation of a fixed MRI unit is anticipated to result in:

- At least a 30-40% increase in volume and revenue
- Reduction in operating cost by approximately 50%.
- Provide flexible and improved staffing 5 days per week
- Positive Return on investment and payback within 3 years or less
- The unit will not require replacement for approximately 7 years, thus leaving years 3-7 with no capital expense for the unit itself.
- Leasing is an optimal solution option when used for limited periods of time; limited needs; while replacing or repairing fixed equipment; technology is advancing more quickly and reducing the life of fixed equipment or when access to capital is very limited.

C. Development of Freestanding Fixed MRI Service in the Bladen County

If approved, this Petition would result in a need determination for one fixed MRI in Bladen County. One option for which a CON could be submitted is a freestanding fixed MRI scanner. However, BCH is a critical access hospital and outpatient services are billed under the hospital Medicare/Medicaid certification. As a CAH financial reimbursement for a hospital based outpatient MRI service would provide a more effective financial situation for BCH. Further, an outpatient freestanding facility would not accommodate inpatients. If hospital based, the MRI can serve the needs of both inpatients and outpatients. It would not be economically feasible for BCH to continue leasing 1 day per week for inpatients and all outpatients to seek care elsewhere.

D. Development of Fixed MRI Services in the Bladen County

A fixed MRI scanner will make MRI services available all day, every day in the Bladen County. It will allow Bladen County patients to remain close to home for timely MRI scanning. It also will allow physicians to make timely diagnosis and begin necessary treatment, possibly preventing disease progression.

VII. The Project Would Not Result in an Unnecessary Duplication of Services

As discussed throughout this Petition, Cape Fear Valley documents that Bladen County patients out-migrate to other providers for fixed MRI scans. The following table shows the hospitals and freestanding fixed MRI providers from which Bladen County patients received MRI scans in FY 2012.

**Bladen County Patients
Out-migration to Fixed MRI Providers: FY 2012**

MRI Provider	Bladen County Patients	Total Number Patients Served by MRI Provider	Bladen County Patients as Percentage of Total Patient Served by MRI Provider
Southeastern Regional Medical Center	472	5,799	8.1%
New Hanover Regional Medical Center	139	12,095	1.1%
Columbus Regional Healthcare System	117	2,340	5.0%
Waccamaw Imaging (Mobile)	113	2,760	4.1%
Cape Fear Valley Medical Center	109	6,719	1.6%
Valley Regional Imaging Fayetteville	101	6,563	1.5%
Carolina Imaging Fayetteville	86	9,089	0.9%
UNC Hospitals	73	20,314	0.4%
OrthoWilmington	58	4,265	1.4%
All Other*	347		
Total	1,878		

Source: 2013 LRAs and RIMEFs

As shown in the previous table, re-capture of out-migrated Bladen County residents will not have a negative impact on the viability of the fixed MRI scanners at hospitals and freestanding fixed MRI providers. All Other in the above table includes all other MRI providers from which

Bladen County patients received MRI scans in FY 2012 with less than 50 Bladen County Patients

VIII. The Project is Consistent with the Three Basic Principles Governing the Development of the SMFP

The petition is consistent with the provisions of the Basic Principles of the *State Medical Facilities Plan*.

1. Safety and Quality Basic Principle

The State of North Carolina recognizes the importance of systematic and ongoing improvement in the quality of health services. Emerging measures of quality address both favorable clinical outcomes and patient satisfaction, while safety measures focus on the elimination of practices that contribute to avoidable injury or death and the adoption of practices that promote and ensure safety. Providing appropriate care in the appropriate setting works to assure quality care.

2. Access Basic Principle

Equitable access to timely, clinically appropriate and high quality health care for all the people of North Carolina is a foundation principle for the formulation and application of the *North Carolina State Medical Facilities Plan*. The formulation and implementation of the *North Carolina State Medical Facilities Plan* seeks to reduce all of those types of barriers to timely and appropriate access. The first priority is to ameliorate economic barriers and the second priority is to mitigate time and distance barriers. The *SMFP* is developed annually as a mechanism to assure the availability of necessary health care services to a population.

An adjusted need determination for one fixed MRI scanner in Bladen County will improve geographic access to fixed MRI services for residents of Bladen County.

Approval of this Petition furthers the policy statement regarding MRI technology in the Introduction to the Chapter 9, Magnetic Resonance Imaging 9 in the *Proposed 2014 SMFP*:

Geographic accessibility is a significant planning issue, and it is important to assure that rural areas of the State have the opportunity to access this important technology through both fixed and mobile scanners, as it has become a standard of care.

Approval of this Petition will allow improved access to basic inpatient and outpatient services that should be provided at the local level.

3. Value Basic Principle

The SHCC defines health care value as maximum health care benefit per dollar expended. Disparity between demand growth and funding constraints for health care services increases the need for affordability and value in health services. Measurement of the cost component of the value equation is often easier than measurement of benefit. Cost per unit of service is an appropriate metric when comparing providers of like services for like populations.

The cost of providing mobile MRI services is expensive for a hospital and its patients. The development of fixed MRI services in Bladen County will allow residents to receive care locally in a lower cost community hospital.

The proposed adjusted fixed MRI scanner need determination in Bladen County will help to maximize health care benefit per dollar expended.

IX. Conclusion

In summary, based on the information set forth above, Cape Fear Valley requests that the SHCC approve an adjusted need determination for one fixed MRI scanner in Bladen County in the *Final 2014 SMFP*.

Chapter 9, Magnetic Resonance Imaging, should be changed as follows:

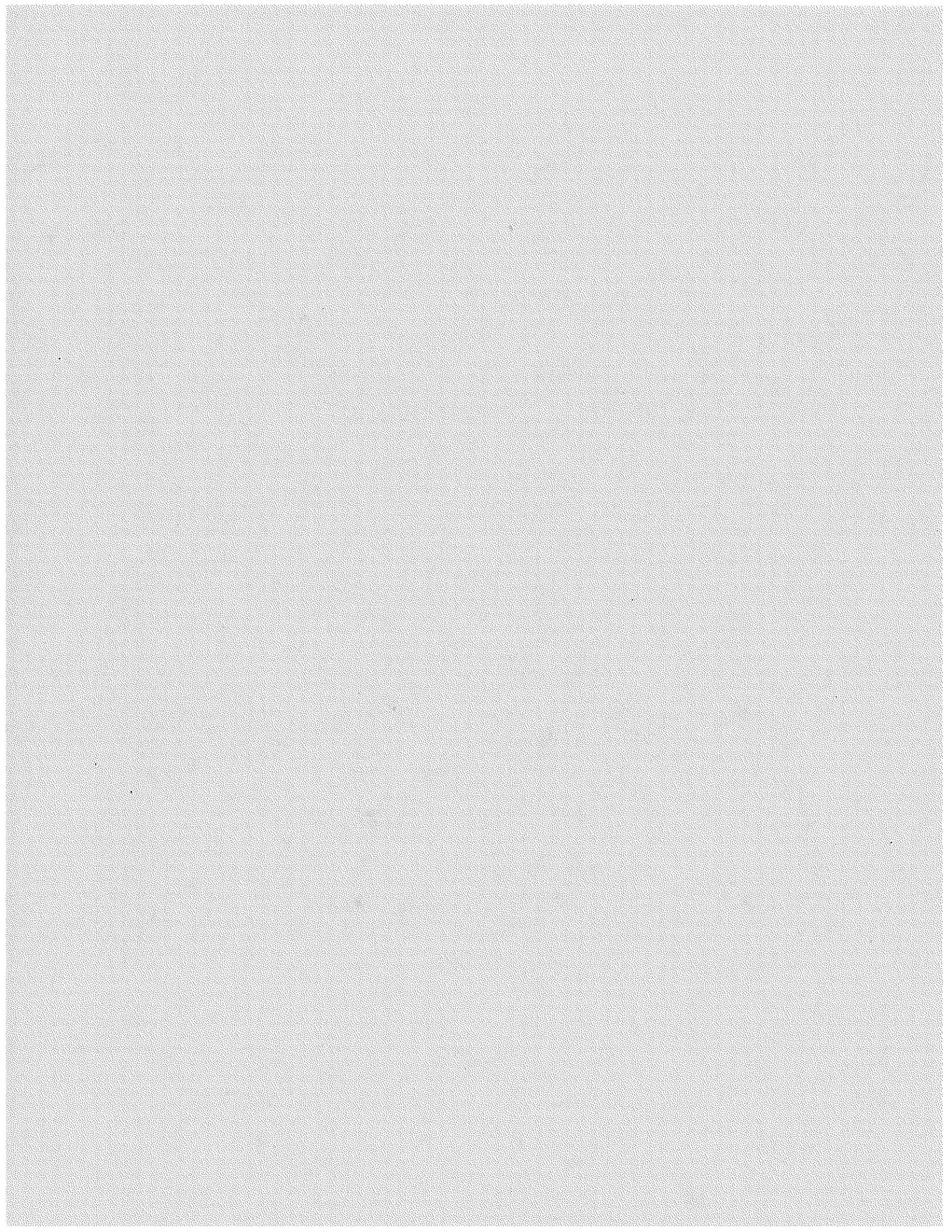
Table 9R: Fixed MRI Scanner Need Determination
(Proposed for Certificate of Need Review Commencing in 2014)

It is determined that the service areas listed in the table below need additional fixed MRI scanners as specified.

Service Areas	Fixed MRI Scanners Need Determination*	Certificate of Need Application Due Date**	Certificate of Need Beginning Review Date
Mecklenburg	1	To be determined	To be determined
Bladen***	1	To be determined	To be determined

* Need Determinations shown in this document may be increased or decreased during the year pursuant to Policy GEN-2 (see Chapter 4).

**Application due dates are absolute deadlines. The filing deadline is 5:30 p.m. on the application due date. The filing deadline is absolute (see Chapter 3).





W. Dickson Schaefer, MD • Christopher J. Barnes, MD • Daniel E. McBrayer, MD
Kimberly A. Barrie, MD • Michael E. Dilello, PA-C, ATC-L • Andy Domer, PA-C

Mr. Jerry Parks
Chairman, North Carolina State Health Coordinating Council
c/o Medical Facilities Planning Branch
Division of Health Service Regulation
2714 Mail Service Center
Raleigh, NC 27699-2714

July 30, 2013

Re: Petition for Adjusted Need Determination for One Fixed MRI Scanner in the Bladen MRI Service Area in the 2014 State Medical Facilities Plan

Dear Mr. Parks:

I am an orthopedic surgeon writing in support of the CON for a Fixed MRI Scanner at Bladen Healthcare, LLC.

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- Their physicians referred them to a hospital or freestanding MRI facility that operates a fixed scanner.
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Cape Fear Valley Health System (Cape Fear Valley) requests an adjusted need determination for one fixed MRI scanner in the Bladen MRI Service Area in the *Final 2014 State Medical Facilities Plan*. Approval of the Petition will allow improved access to basic inpatient and outpatient services that should be provided at the local level, and will help to maximize health care benefit per dollar expended.

Please convey to the members of the Technology & Equipment Committee and the State Health Coordinating Council, my approval and enthusiastic support for Cape Fear Valley's Petition.

Sincerely,

W. Dickson Schaefer
MD

FAYETTEVILLE LOCATION:
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Sincerely,

Kimberly A. Barrie
MD

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Christopher J. Barnes
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**CAPE FEAR VALLEY
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BLADEN KID'S CARE

BLADEN MEDICAL ASSOCIATES

WOMEN'S HEALTH SERVICES

BLADEN SPEECH PATHOLOGY

BLADEN SURGICAL SPECIALISTS

BLADEN EXPRESSCARE

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July 31, 2013

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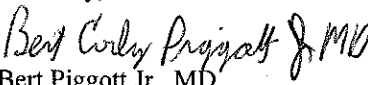
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Sincerely,


Bert Piggott Jr., MD



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July 31, 2013

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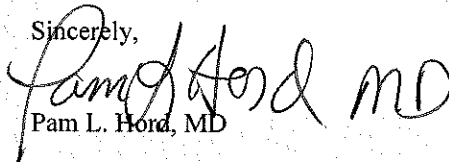
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Sincerely,


Pam L. Hord, MD



**CAPE FEAR VALLEY
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BLADEN COUNTY HOSPITAL

Mr. Jerry Parks
Chairman, North Carolina State Health Coordinating Council
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BLADEN PT/OT

BLADEN KID'S CARE

July 31, 2013

BLADEN MEDICAL ASSOCIATES

Re: Petition for Adjusted Need Determination for One Fixed MRI Scanner in the Bladen MRI Service Area in the 2014 State Medical Facilities Plan

WOMEN'S HEALTH SERVICES

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BLADEN SPEECH PATHOLOGY

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BLADEN SURGICAL SPECIALISTS

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BLADEN EXPRESSCARE

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Sincerely,

Craig Louisy, MD



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Sincerely,


Jong W Kim, MD



**CAPE FEAR VALLEY
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Dear Mr. Parks:

I am a member of the Bladen County Commissioners.

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Please convey to the members of the Technology & Equipment Committee and the State Health Coordinating Council, my approval and enthusiastic support for Cape Fear Valley's Petition.

Sincerely,


Billy Ray Part
Commissioner At-Large



**CAPE FEAR VALLEY
BLADEN HEALTHCARE**

BLADEN COUNTY HOSPITAL

Mr. Jerry Parks
Chairman, North Carolina State Health Coordinating Council
c/o Medical Facilities Planning Branch
Division of Health Service Regulation
2714 Mail Service Center
Raleigh, NC 27699-2714

BLADEN PT/OT

BLADEN KID'S CARE

July 31, 2013

BLADEN MEDICAL ASSOCIATES

Re: Petition for Adjusted Need Determination for One Fixed MRI Scanner in the Bladen MRI Service Area in the 2014 State Medical Facilities Plan

WOMEN'S HEALTH SERVICES

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BLADEN SPEECH PATHOLOGY

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BLADEN EXPRESSCARE

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Sincerely, *Daniel R Dowless*

Daniel R. Dowless
Commissioner, District 2



**CAPE FEAR VALLEY
BLADEN HEALTHCARE**

BLADEN COUNTY HOSPITAL

Mr. Jerry Parks
Chairman, North Carolina State Health Coordinating Council
c/o Medical Facilities Planning Branch
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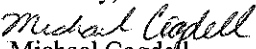
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Sincerely,

Michael Cogdell
Commissioner At-Large



**CAPE FEAR VALLEY
BLADEN HEALTHCARE**

BLADEN COUNTY HOSPITAL

BLADEN PT/OT

BLADEN KID'S CARE

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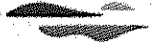
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Sincerely,

Charles Ray Peterson
Commissioner, District 2



**CAPE FEAR VALLEY
BLADEN HEALTHCARE**

BLADEN COUNTY HOSPITAL

BLADEN PT/OT

BLADEN KID'S CARE

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Sincerely,

Russell Priest
Commissioner, District 3



**CAPE FEAR VALLEY
BLADEN HEALTHCARE**

BLADEN COUNTY HOSPITAL

Mr. Jerry Parks
Chairman, North Carolina State Health Coordinating Council
c/o Medical Facilities Planning Branch
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WOMEN'S HEALTH SERVICES

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BLADEN SPEECH PATHOLOGY

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Sincerely,

Mark Gillespie
Vice-Chairman, District 1



**CAPE FEAR VALLEY
BLADEN HEALTHCARE**

BLADEN COUNTY HOSPITAL

Mr. Jerry Parks
Chairman, North Carolina State Health Coordinating Council
c/o Medical Facilities Planning Branch
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BLADEN SPEECH PATHOLOGY

I am the County Manager of Bladen County.

BLADEN SURGICAL SPECIALISTS

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Sincerely,


Gregory J. Martin
County Manager



**CAPE FEAR VALLEY
BLADEN HEALTHCARE**

BLADEN COUNTY HOSPITAL

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Sincerely,

James G. Smith
Chairman, At Large



**CAPE FEAR VALLEY
BLADEN HEALTHCARE**

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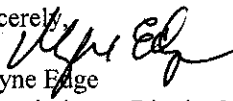
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Wayne Edge
Commissioner, District 3