LETTER OF TRANSMITTAL

PDA

Cameron Village 2016 Cameron Street P.O. Box 12844 Raleigh, NC 27605 Nancy M. Lane, MA (919) 754-0303 Fax (919) 754-0328 nlane@pda-inc.net

То:	Medical Facilities Planning Branch, Division of Health Service Regulation 2714 Mail Service Center Raleigh, NC 27699 Kelli.Fisk@dhhs.nc.gov					3/19/2015 Kelli Fisk thur Dosher M ng Petition - Co	Job Number: [emorial Hospit omments	11-7007-14 tal - MRI 2015
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☐ As requested ☐ Return			Returned for c	orrections		Return corr	ected prints	
\square For review and comment \square								
Ren	Remarks: Submitted to Kelli Fisk via email 03.19.15							
Сор	Copy To: Dan Porter, COO Signed: KI							

Comments on Petition to State Health Coordinating Council Regarding Technology and Equipment Policy / Methodology for Fixed Magnetic Resonance Imaging Equipment for 2016 State Medical Facilities Plan

March 20, 2015

Commenter:		Contact:		
Name:	J. Arthur Dosher Memorial Hospital	Name:	Dan Porter, CFO	
Address:	924 North Howe Street Southport, North Carolina 28461	E-mail:	danporter@dosher.org	
		Phone:	910-457-3912	

Members of the SHCC asked questions during and following the presentation at the public hearing in Raleigh on March 4, 2015. The following paragraphs respond with data and information not available at that time.

1. What minimum number of MRI procedures would be needed for Dosher to operate its own fixed MRI at breakeven?

J. Arthur Dosher Memorial Hospital (Dosher) is a critical access hospital. Based on that structure and current payor mix, the hospital projects it would reach Net Income breakeven with 860 Magnetic Resonance Imaging (MRI) procedures. Net Income includes cost of interest expense for financing, depreciation of fixed equipment, and other indirect costs. Based on Dosher's current ratio of weighted to unweighted procedures, breakeven would equate to approximately 990 equivalent MRIs.

2. Can Dosher staff MRI equipment 24-hours per day / seven days per week?

Dosher employs Radiology Technicians today. Currently, one Radiology Technician is in training for MRI credentials. It takes about six months for the training. The hospital will easily have two by the time the ownership transaction is completed. Two trained MRI Technicians can provide coverage for both the 66-hour weekly MRI operating schedule required by the CON rules and 24-hour / seven day per week on-call needs.

3. How will the project be cost-effective?

Medicare and Medicaid reimburse critical access hospitals, like Dosher, on a cost-related basis. If Dosher maintains just its current procedure volumes, and owns the equipment, it can reduce per procedure costs below what the current fee for service arrangement with Alliance requires

for the current fixed MRI arrangement. Therefore, by purchasing and operating its own fixed MRI equipment, Dosher would create cost savings for the NC Medicaid program and CMS.

Ownership, would also give Dosher control over equipment schedules. Schedule control provides better continuity of care.

Dosher thanks the Agency and the State Health Coordinating Council for their time and the opportunity to pursue this petition. Please advise if the Council or staff have other questions or additional information requests.

The attached 32 letters in support of Dosher's petition are addressed to the Agency and were sent directly to Dosher. The letters include support from Shelbourn Stevens, President of Novant Health Brunswick Medical Center and Jack Barto, President and CEO of New Hanover Regional Medical Center, as well as Dosher medical staff, and area physicians in family practice, internal medicine, general surgery, and other specialties.

Attachments: Letters in Support of Dosher Petition (32)

March 20, 2015 Page 2 of 2

Ms. Shelley Carraway, Chief Healthcare Planning and Certification of Need Section 2701 Mail Service Center Raleigh, NC 27699-2714

RE: Letter of support for J. Arthur Dosher Memorial Hospital's 2015 Spring Petition for Change in 2016 Proposed North Carolina State Medical Facilities Plan regarding Magnetic Resonance Imaging equipment

Dear Dr. Ullrich and Ms. Carraway,

Please add my support to the petition from J. Arthur Dosher Memorial Hospital (Dosher) for a new Policy in the 2016 Proposed North Carolina State Medical Facilities Plan (SMFP) regarding Magnetic Resonance Imaging (MRI) equipment.

A community hospital that offers 24/7 emergency room services, demonstrates a history of MRI services, and that has a fixed MRI, should have the option to offer that service in the most cost-effective way possible. MRI is now a common tool for diagnosing soft tissue. It provides information that CT and x-ray cannot. It stands to reason that wherever possible residents of this state should have access to it, and the institution providing the service should be able to organize it in a way that makes it most accessible.

As the state grows, other hospitals besides Dosher may develop five-day a week MRI service. It should not be necessary for Dosher, or any other hospital, to petition the State Health Coordinating Council for the right to replace leased service with owned services. Nor should the community served by Dosher, be forced to wait until its county requires another MRI unit before it can apply to own fixed equipment that it already supports.

Signature: Shillaurn Stuum, Prusidut	
Name: Shelbourn Stevens Representing: Novant Health Brunswick Medical Center	
Address: 240 Hospital Drive Boliva NC 28422	



March 18, 2015

Christopher Ullrich, MD, Chair State Health Coordinating Council

Ms. Shelley Carraway, Chief Healthcare Planning and Certification of Need Section 2701 Mail Service Center Raleigh, NC 27699-2714

RE: Letter regarding J. Arthur Dosher Memorial Hospital's 2015 Spring Petition for Change in 2016 Proposed North Carolina State Medical Facilities Plan regarding Magnetic Resonance Imaging equipment

Dear Dr. Ullrich and Ms. Carraway,

Please add my comments regarding the petition from J. Arthur Dosher Memorial Hospital (Dosher) for a new Policy in the 2016 Proposed North Carolina State Medical Facilities Plan (SMFP) regarding Magnetic Resonance Imaging (MRI) equipment.

As a federally designated Critical Access Hospital that offers 24/7 emergency room services and treats all patients regardless of ability to pay, Dosher needs a fixed MRI to serve its patients and its community. MRI is now a common tool for diagnosing soft tissue, and this service has become an expectation of hospitals that reach a certain size and service area, which Dosher has done. Patients using hospital services in this state should have convenient access to MRI, and the state should enact proper rules and procedures within the existing CON law to ensure this access is available. This should be especially true when the proposed service is less costly than the alternatives — which is the case in this instance.

For the Southport area of Brunswick County, a growing retirement and vacation center, a hospital-based MRI is needed for this particular population. We believe Dosher having an MRI will most appropriately serve its community, and support any legitimate change through the CON process that will allow this to happen.

Sincerely, Signature, authors	
Name: Jack Bouto	Representing: New Hanguer Regional Medical Conten
Address: P.O. Box 9000	
wilmington, We 28402	

March 12, 2015

Christopher Ullrich, MD Chair, State Health Coordinating Council

Ms. Shelley Carraway Chief, Healthcare Planning and Certification of Need Section 2701 Mail Service Center Raleigh, NC 27699-2714

RE: Letter of support for J. Arthur Dosher Memorial Hospital's 2015 Spring Petition for Change in 2016 Proposed North Carolina State Medical Facilities Plan regarding Magnetic Resonance Imaging equipment

Dear Dr. Ullrich and Ms. Carraway,

This letter is to express my support for Dosher's petition for a Policy Adjustment / Change to the Methodology in the 2016 Proposed North Carolina State Medical Facilities Plan (SMFP) regarding Magnetic Resonance Imaging equipment. My name is Dr. Karen Wood and I am the Chief of the Medical Staff at J. Arthur Dosher Memorial Hospital (Dosher).

Brunswick County is a vacation destination, has a large retirement population, and a significant population who have complex chronic disease. Its residents are among the oldest in North Carolina. Together, these factors make our population large and multifaceted; and, as a result, Dosher health care practices are greater and more complex than expected for a rural critical access hospital.

We have demonstrated that Brunswick County can support a full time MRI at both hospitals. Dosher medical staff, full and part time clinical specialists and I regularly refer patients for MRI at Dosher. It makes sense for a hospital to own its MRI when the volume of procedures is sufficient to support it. Ownership provides many benefits to hospitals and its patients, including management of schedule; better continuity of care; control regarding quality of the equipment; opportunity for lower costs; and increase of access to services. One hospital has this privilege. Both should.

Please approve this petition and help Dosher provide important services to Brunswick County. Thank you for your time and attention to this important matter.

Sincerely,

Signature: Specialty: Jevely redicine

Address: 3599 George II. Hybridy

Southport, NC 3846

Ms. Shelley Carraway, Chief Healthcare Planning and Certification of Need Section 2701 Mail Service Center Raleigh, NC 27699-2714

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Sincerely,	BANN CONTRACTOR OF THE PARTY OF
Signature: _	
Name:	Philip B. Bates MD Representing: General Surgery
Address:	819 N Atlanta Ave
_	Southport NC 28461
	V -

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Ms. Shelley Carraway, Chief Healthcare Planning and Certification of Need Section 2701 Mail Service Center Raleigh, NC 27699-2714

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Please approve the petition and help Dosher provide important services to Brunswick County. Thank you for your time and attention to this important matter.

Sincerely,	16
Signature:	Robut M Zujashi MD
Name:	ROBERT M ZUKOSKI Specialty: GENERAL SURGERY
Address:	904 HOWE ST
	SOUTHPORT, NC 28461

Ms. Shelley Carraway, Chief Healthcare Planning and Certification of Need Section 2701 Mail Service Center Raleigh, NC 27699-2714

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Sincerely,	
Signature: Mush, MD	
Name: Keith C. Reschly MD Representing: Hospitalist	
Address: 6035 Spikprush Trail	
Southport, NC 28461	

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Sincerely, Signature:	Jal A MAA	
Name:	John A. Burdette Mo Representing: Dosher Memorral	Emersence
	6098 Dutchmer (regle 100d	Dyertmid
_	Somhput NC 28461	

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Sincerely,	Marie 1
Signature:	
Name:	Juan LAKicle Representing: Cardiologist
Address:	4222 Asna Benche Rol.
	Jorthan NC 28461
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Sincerely,			
Signature:	FNBU	_	
Name:	BARBALA PAOLUCEI	_ Representing:	Detho wilmagton
Address: _	18 Doctors Circle		U
	Supply NC 28462		
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Sincerely,		
Signature:	The DAY EACEDS	
Name:	Byen Subtychk Representing:	
Address: _	5504 Reb Carly Blue	
_	Surtlant NC 28461	
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March 12, 2015

Christopher Ullrich, MD, Chair State Health Coordinating Council

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Sincerely,				
Signature:				
Name: Domenic Polagouto	Specialty:	FP		
Address: 3955 George 11	Highwan	Sasupot	NC	28461

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Sincerely,
Signature: VOLTOURARDER
Name: Lee LANGSTON mb FARFREDresenting: Chicora Medical-Self
Address: 1694 Sout Mark Circle
0 IB N.C. 28469

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Sincerely,	7000		
Signature:	. 1000	-	
Name:	IIMOTTHY GIBBLE M.D.	Representing: ATLANTIC INTERVAL	MEDICINE
Address: _	16 Medical Center	Dr.	_
	SUPPLY NC 284	62	_

Christopher Ullrich, MD, Chair State Health Coordinating Council

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We have demonstrated that Brunswick County can support a full time MRI at both hospitals. As a member of the Dosher medical staff, I regularly refer patients for MRI. It makes sense for a hospital to own its MRI when the volume of procedures is sufficient to support it. Ownership provides control over schedule for continuity of care in meeting the needs of my patients. It also offers a say regarding quality of the equipment. One hospital has this privilege. Both should.

Please approve this petition so that Dosher and hospitals like it can make an orderly transition from leased to owned MRI equipment. Thank you for your time and attention to this important matter.

Sincerely,	
Signature: Double KUH (10
Name: Dougens & Hiltz MID	Specialty: Laternal Mc DICINE
Address: 1573 N Howe ST	
SouthPort NC 28461	

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Sincerely,	
Signature:	
Name: Kristos Yay hon Do Specialty: family ?	actice
Address: 4222 cong Beach Road	
Son the part, NC 28461	

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Signature: Signature: Specialty: Family Medicine

Address: 4222 Long Beach Rd. Southpart, Ne. 28461

March 12, 2015

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Oll -		
18000		
Wessica Bocook po	Specialty:	Family Practice
4700 € Oak Island	Dr	
oak Island, NC	28465	
	4700 € Oak Island	Vessica Bocook po Specialty: 4700 & Oak Island Dr Oak Island, NC 28465

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Christopher Ullrich, MD, Chair State Health Coordinating Council

Ms. Shelley Carraway. Chief Healthcare Planning and Certification of Need Section 2701 Mail Service Center Raleigh, NC 27699-2714

RE: Letter of support for J. Arthur Dosher Memorial Hospital's 2015 Spring Petition for Change in 2016 Proposed North Carolina State Medical Facilities Plan regarding Magnetic Resonance Imaging equipment

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Please approve this petition so that Dosher and hospitals like it can make an orderly transition from leased to owned MRI equipment. Thank you for your time and attention to this important matter.

Signature: _	D. Thom Hall	Par PMD		_		
	G. THOMAS HOWA			Specialty: _	FAMILY MACTICE	
Address:	#ILEAST 9THST	SOUTHAGET	NC	28461		
_	<u> </u>					

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Sincerery,			
Signature:	and Chund MD	_	
Name: A	NDRE L. MINOR MD	Representing:S&CE	Internal Medicine
Address: _	905 N HOWE ST		
	Southfort NC 28	3461	

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Signature: DAME (B. Mr. (Allum 1.MD)

Name: Distivited B. Mai (Allum 1.MD)

Specialty: Ind. Med

Address: 905 N. Hour St

South part N(2846)

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Sincerely,		
Signature: Swan Mills	_	
Name: SUSAN GBBUE-PA	Representing: ATTANTIC DUTINAL	MEQUAT
Address: 16 MBOILAL LOUTER DRIVE		_
Supply NC 28462		_

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Sincerely,			
Signature	: Tirginia Czenber 1	FUP-C	
Name:	lirginia Czinber	Representing:	Calabash Tot. Me a
Address:	9970 Beach Dr. SE	Sixte 1	
	Calabash, NC		

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Signatur	e: Eilee	-MCe	penes			
Name: _	Eileen	M Ce	PONES	Representing:	BSC Fan	e Medeen
Address	Bo	iling !	Juigo	NC		
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Sincerely	y,	./ /					
Signature	e: Kau	en A. Cha	uce NAC	<u> </u>			
Name: _	Kaven	H. Chance	NAC	_ Representing:	Dosher	Memoral	Hojn tol
Address:	4222	Long Beach	Rd.				20 1
	Sou	thout, NC	28461				_

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Sincerely, () ()
Signature: Lell Meterles Name: Edward McKerthe Representing: Dosler Nenwich Hospital
Name: Edward notethan Representing: Doslar Nenwich Hospital
Address: P.O. Box 409
Boliva NC 28422

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Sincerely, A A
Signature: William I Willi
Name: Heather Merrow Representing: DOSher- Holden Beach
Address: 2930 Holden Beach Rol
SURDIX NC 28462

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Sincerely,			
Signature: _	Bet 2. Relia MC		
Name:	Brast L. Parties PA.C.	_ Representing: Do Sher Medicel.	Calabash
Address:	10195-5 Beach A.	Sa.	
_	Calabash, Nor 20	9467	

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Signature: Dawn Samman Atc.	
	Specialty: Orgent Cant
Address: 4222 Long Beach Rd	
Southput NP 28461	

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Signature: Omy Smith PA Specialty: Family Practice

Address: 4700 Clark Leland Da

Onk Leland NC 28165

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Signature: MELISSA COCKANIL DONP-C Specialty: KAMILY PALASICE

Address: Gos N Hows ST

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Signature: Brooke Campbell PA Specialty: Vrgent (ARE

Address: 4222 Long Beach Rd

Southport NK 28461

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