

Summer 2022 Petition for Mobile MRI Services - Public Hearing Remarks

Novant Health

Introduction

Novant Health intends to file a petition requesting approval of two new statewide mobile MRI units for inclusion in the 2023 SMFP to improve access to mobile MRI services for residents of North Carolina. It has been 12 years since a new mobile MRI unit has been approved to operate in the state. Demand for this critical imaging modality has grown exponentially and providers have struggled to meet the demand. Our petition will outline the critical point that mobile MRI services are severely needed across the state.

Without the approval of additional mobile MRI units by the SHCC, North Carolina residents will continue to be adversely impacted by the lack of sufficient mobile MRI capacity necessary to meet the high demand for mobile MRI imaging services across the State. Mobile MRI providers, like Novant, are finding it increasingly difficult to provide additional service requested by existing mobile MRI host sites as well as potential new host sites due to lack of mobile MRI capacity across the state.

SMFP & MRI Methodology

Beginning with the 2010 SMFP, one sentence was included in the MRI Chapter - “there is no need for mobile MRIs”. This one statement remained in subsequent SMFPs, which effectively created a moratorium on new mobile MRI units in North Carolina for the more than a decade. The last CON-approved mobile MRI unit occurred in 2010 based on a 2009 CON application.

The SMFP’s MRI Methodology utilizes both fixed and mobile MRI volume each year to determine need for additional fixed MRI scanners only. Since 2010, the MRI Methodology has generated **39** need determinations for additional fixed MRI scanners in North Carolina. Despite the increase in fixed MRI scanners over the last 12 years, mobile MRI volume continues to expand without the availability of additional mobile MRI capacity. Last year, mobile MRI units performed over 148,000 unweighted MRI scans.

Currently, of the approximately 47 mobile MRI units authorized to provide services in North Carolina, 11 mobile MRI units are “parked” at one host site¹. These units essentially operate as fixed MRI scanners. This represents roughly 25% of the mobile MRI units in North Carolina. The remaining 36 mobile MRI units travel across the State providing service to nearly 150 mobile host sites, many of which are acute care facilities.

The logistics of operating a mobile MRI scanner, such as travel time for the Mobile MRI unit, travel time for clinical professionals, and the operating hours of each host site are factors that limit capacity for each mobile MRI unit in North Carolina. Mobile MRI providers have been challenged for the last decade with the task of creating additional capacity through efficient route planning and longer hours of operation.

Novant Health operates the second-largest fleet of mobile MRI units in the state. For several years, the availability of mobile MRI capacity has been extremely limited. Many of our existing mobile host sites have requested additional days of service beyond what our own mobile units can provide. We have reached out to our competitors, like Alliance Imaging, to secure additional mobile MRI days for the Novant Health host sites but have been unsuccessful since the capacity issues have impacted all mobile MRI providers.

¹ Legacy (or grandfathered) mobile MRI units that were in operation prior to the 1993 Certificate of Need law are not subject to the same conditions as the CON-approved mobile MRI units. CON-approved mobile MRI units are typically required to serve at least two host sites.

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Action Needed

Mobile MRI services are a critical component of the healthcare system particularly for facilities in rural communities as well as acute care facilities that require mobile MRI service to support patient demand. Approval of the Novant Health Petition will create a need determination for at least two (2) mobile MRI units that are critically needed to serve patients across North Carolina. Without the SHCC's approval of a special need determination, there is no pathway for providers to obtain additional mobile MRI units. This is vitally important to bring timely services to patients. Assuming a need determination is approved for the 2023 SMFP (and is scheduled for review early in 2023), it would likely be 2025 before these new units are operational. Any delay in approving a need determination would result in significant hardships for providers and patients.

Conclusion

Thank you for the time to share our remarks regarding Novant Health's petition for two statewide mobile MRI units to be added to the 2023 SMFP. We appreciate the SHCC's careful consideration of this important issue and look forward to submitting our full petition.

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