Petition to the State Health Coordinating Council Regarding Special Need for Fixed Magnetic Resonance Imaging Equipment for Wake County 2016 State Medical Facilities Plan

July 29, 2015

Petitioner	1.	Contact:	
Name:	Raleigh Radiology	Name:	Dianne Jones, Operations and Marketing Manager
0 dd=====	150 Parkway Office Court, Suite 100	E-mail:	<u>Dianne.jones@raleighrad.com</u>
Address:	Cary, NC 27518	Phone:	919-256-3570

STATEMENT OF REQUESTED ADJUSTMENT

Raleigh Radiology, LLC (Raleigh Radiology), requests the following change to the 2016 State Medical Facilities Plan (SMFP) to address a special need for Fixed Magnetic Resonance Imaging equipment (MRI) in Wake County:

Table 9R: Fixed MRI Scanner Need Determination

(Scheduled for Certificate of Need Review Commencing in 2016)

Pursuant to a special need petition submitted by Raleigh Radiology, It is determined that the service areas listed in the table below need additional fixed MRI scanner.

Service Areas	Replacement MRI Scanner Need Determination	Certificate of Need Application Due Date**	Certificate of Need Beginning Review Date
Wake County	1***	TBD	TBD

^{*} Need determination 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).

^{***} Provided that in response to this need, a scanner should be located in a community acute care hospital that does not own, or whose parent company does not own fixed MRI equipment in this area.

REASONS FOR THE PROPOSED ADJUSTMENT

RALEIGH RADIOLOGY DILEMMA

Raleigh Radiology has demonstrated that it can support two full time scanners in Wake County but the methodology in the Proposed 2016 State Medical Facilities Plan (SMFP) shows no need for additional MRI capacity. Thus, the means by which it can offer MRI service full time is a high-priced contract with a third party vendor.

Raleigh Radiology (RR), one of the oldest radiology practices in the Triangle area; owns three offices in Wake County (RR Blue Ridge, RR Cary & RR Breast Center), partners in a Joint Venture with Outpatient Imaging Affiliates (Pinnacle Health Services of NC, LLC) in one facility (RR Bier Creek) and contracts to provides medical direction and professional interpretation at three sites owned by OIA in Wake County (RR Cedarhurst, RR Wake Forest & in Johnston County – RR Clayton), including two diagnostic centers.. All 25 radiologists are Board Certified. Most hold fellowships in subspecialty fields of radiology, including musculoskeletal, neuroradiology, abdominal imaging, mammography and women's imaging, nuclear medicine, as well as vascular and interventional radiology. Its staff capabilities included interpreting MRI scans for:

- Head (to search for brain tumors, aneurysm and nerve injury)
- Chest (to examine aortic aneurysm and stenosis)
- Blood vessels (to examine the heart, valves, coronary blood vessels, aortic aneurysm and stenosis
- Abdomen and pelvis (to search for tumors, bleeding, infection, and blockages in the liver, gallbladder, pancreas, kidneys and bladder)
- Bones and joints (to look for signs of arthritis, bone marrow problems, bone tumors, cartilage problems, torn ligaments, torn tendons or infection)
- Spine (to examine the disks and nerves, and look for signs of spinal stenosis, disk bulges and spinal tumors)
- Breast (to detect and stage breast cancer and examine other breast abnormalities)

The practice serves approximately 96,000 patients a year. Raleigh Radiology accepts all payers: including Medicare, Medicaid, and TriCare – and it provides a significant amount of charity and discounted care. The practice is committed to value pricing, which has made it the provider of choice for the WakeMed / Key IPA Accountable Care Organization; and the preferred provider for patients who self-pay, or have high deductible and coinsurance plans.

Hospitals contract for Radiology services. Our radiologists are on staff at Rex Hospital.

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¹ https://www.raleighrad.com/practice-overview/the-radiologists/

MRI SERVICE

Raleigh Radiology does not own an MRI scanner. In 2005, Raleigh Radiology initiated the MRI services by contracting with Alliance Healthcare Services. The practice started with mobile at one site, but now two sites use 'grandfathered' scanners that are installed as fixed units - one in Raleigh and one in Cary. Raleigh Radiology built and developed each of the spaces; Alliance Healthcare Services. owns and staffs the 1.5 tesla open bore equipment. In this arrangement, Raleigh Radiology, LLC leases the Alliance Healthcare Services. service. The lease is treated as an operating lease, and is permitted because Alliance Healthcare Services. obtained rights to the MRI equipment 22 years ago; before North Carolina statute required a certificate of need (CON) to acquire an MRI. Alliance Healthcare Services., which is owned by Oaktree Capital Management, LLC and MTS Health Investors, LLC, has rights to 27 North Carolina MRI units, 20 of which have grandfathered status.

Although Raleigh Radiology contracts with Alliance for both its RR Blue Ridge(Raleigh) and RR Cary (Cary) MRI equipment which is identical, Table 9P of Proposed 2016 State Medical Facilities Plan (SMFP), lists them differently, treating one as fixed and one as mobile. The treatment impacts the need calculation, but not enough to trigger a need in the 2016 SMFP.

Excerpt from Table 9P Proposed SMFP Raleigh Radiology, LLC MRI sites

County	Service Type	CON#	Service Site / Provider/ Owner	Fixed	Fixed Equivalent	Adjusted Total Scans FFY 2014
Wake	Freestanding	Grand-	Raleigh Radiology (Alliance	1.0	1.0	4.545
vvake	Fixed	fathered	Healthcare Services)	1.0	1.0	4,545
Wake	Mobile	Grand-	Raleigh Radiology- Cary	0	0.91	4,858
vvake	Mobile	fathered	(Alliance Healthcare Services)		0.91	4,030

Source: Proposed 2016 State Medical Facilities Plan, Chapter 9

Raleigh Radiology contracts with Outpatient Imaging Affiliates (Pinnacle Health Services of NC, LLC) and provides professional interpretation and medical director oversight of Pinnacle's IDTF facilities located in Raleigh, Clayton and Wake Forest. These facilities are named Raleigh Radiology Clayton, Raleigh Radiology Cedarhurst, and Raleigh Radiology Wake Forest. However, these facilities are wholly owned by OIA (Pinnacle Health Services of NC, LLC) - Raleigh Radiology does not own any portion of these facilities. OIA owns one mobile MRI that it operates at Wake Forest and Clayton, and a fixed-site MRI that is installed at Raleigh Radiology Cedarhurst, Raleigh, NC.

Raleigh Radiology, LLC also partners in joint venture with Pinnacle at Raleigh Radiology Brier Creek, Raleigh, NC. This site utilizes a mobile InSight MRI scanner 2 days / week. This facility is managed by Pinnacle; with interpretations provided by Raleigh Radiology, LLC.

Table 9P identifies two of the Pinnacle sites as "Raleigh Radiology (Pinnacle...)" sites. The Clayton site appears to be incorporated in the Wake Forest data.

Location	Adjusted 2014 Scans
Raleigh Radiology at Wake Forest (Pinnacle Health Services of NC, LLC)	2,322
Raleigh Radiology Brier Creek (Pinnacle Health Services of NC, LLC)	874

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Since 2005, Raleigh Radiology has paid Alliance \$17.5M for the MRI service at its Raleigh Radiology Blue Ridge and Raleigh Radiology Cary locations. This is more than enough to have acquired both units. A comparison showed our costs would drop by \$530,000 each year if the practice owned just one of the two scanners directly, a savings of \$95 per scan based on current volume. Attachment A contains detail on the analysis.

The mobile lease arrangement with Alliance was the only option available to Raleigh Radiology in 2005. The SMFP showed a need for one MRI scanner in 2005, but Raleigh Radiology did not have the history to compete well for it. The only option for this large radiology practice to offer MRI services full time was the Alliance mobile contract. In 2009, Alliance Healthcare Services. was, and still is, the only contract provider not owned by a health care system that could offer full time MRI service at a fixed location. The contracts are limited and renewal is subject to Alliance terms.

With this monopoly on flexibility, the vendor can keep increasing the lease price. Raleigh Radiology asked Alliance if they would consider selling the MRI units, but the CONs drive up the value so much that the price of both the CON and the MRI is far too high to make purchase financially feasible. The contract is up for renewal again at the end of 2016. To increase hours of service, as Raleigh Radiology would like, Alliance will increase the contract cost, to cover the extra staffing and profit.

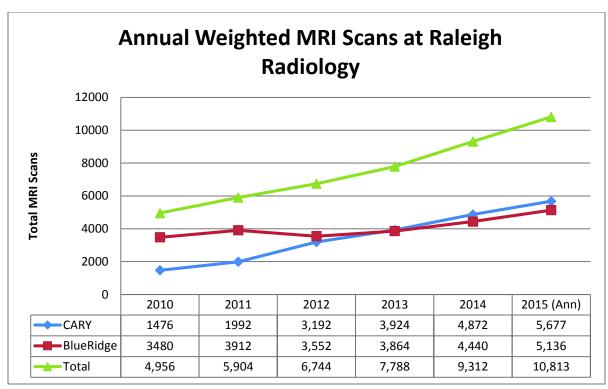
In today's, setting, when value is important, the contract is difficult to justify and cumbersome. Not only does the cost for lease renewals increase annually by the CPI (historically 1.5 - 2%), but the equipment remains the same and Raleigh Radiology has no control over staffing. Staff work for Alliance Healthcare Services., which means they rely on Alliance for training and work the hours that Alliance sets. This produces:

- Unnecessary overtime expense and inflexible staff schedules,
- Less flexible schedules that cannot be optimized, and
- Patients that wait longer than necessary for scans.

VOLUME OF SCANS EXCEEDS THRESHOLDS

Since 2010, Raleigh Radiology's total annual adjusted MRI scans at the two full time locations, calculated per federal fiscal year (Oct-Sept) grew from 5,000 in two sites together to more than 5,000 per site forecast for 2015. This exceeds the 2016 SMFP planning methodology threshold for an additional Wake County scanner. The Wake threshold is 4,805 scans.

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Data for 2015 are annualized from the first six months of 2015.

Raleigh Radiology's 14 to 20 percent annual growth reflects the value its radiologists provide to referring physicians and the price value to their patients. No referring physicians are owners of Raleigh Radiology.

Wake County

This request for a special need determination is reasonable. **As a whole, Wake County averaged 4,575** weighted scans in 2014, just slightly less than enough to generate a need. Table 9P in the Proposed 2016 SMFP indicates that scanners in Wake County reported 96,131 weighted scans in 2014. In FY 2014, five Wake County locations reported providing more than 4,805 adjusted annual scans:

- Raleigh Radiology Cary,
- WakeMed,
- Two Raleigh Neurology sites, and
- OIA (Pinnacle Health Services of NC, LLC operated Cedarhurst.

As value becomes more important to payers, patients and referring providers, pressure to increase Raleigh Radiology capacity goes up. Access limitations at our practice should not force patients to higher cost providers. Yet, as the mobile sites increase the number of scans, the count of full-time equivalent scanners goes up. Thus the methodology creates a long lead time to show need for one more scanner. Table 9P shows Wake County has 16 "Fixed" and 21.01 "Fixed equivalent" scanners. The Grandfathered scanners could change location if the contracts terminate or change. Listing all of the Grandfathered sites as mobile would change the "Fixed Equivalents" to 20.07 and the methodology would come closer to showing a need for one additional scanner in Wake County.

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Change in Average 2014 Scans per MRI by Counting All Wake County Grandfathered Scanners as Mobile Scanners

Wake County Location		Adjusted Scans	Recalculated Fixed Equivalent Scanners	Adjustment
	Note	(a)	(b)	(c)
Raleigh Neurology Associates (Alliance Healthcare Services)		5,133	1.0	0
Raleigh Radiology (Alliance Healthcare Services)		4,545	0.937	(0.0623)
Wake Radiology Diagnostic Imaging (Alliance Healthcare Services)		3,681	0.759	(0.241)
Wake Radiology Garner (Alliance Healthcare Services)		2,767	0.571	(0.430)
Wake Radiology Raleigh MRI Center (Wake Radiology Diagnostic Imaging)		3,850	0.794	(0.201)
Total Change	(d)			(0.94)
Table 9P Fixed Equivalent Scanners	(e)			21.01
Revised Total Fixed Equivalent Scanners	(f)			20.07
Revised Average Scans per Scanner	(g)			4,790

Notes:

- a. Data from Table 9P.
- b. Apply step 11. Divide adjusted scans by 4,805, the Wake County threshold.
- c. 1 minus column b
- d. sum above
- e. Wake County sum
- f. e minus d
- g. Total Wake County adjusted scans Table 9P: 96,131/f

The MRI methodology is retrospective. It makes no adjustments for future population growth. Wake County is the fourth fastest growing county in the state, according to the NC State Office of Budget and Management; it is growing at 1.92 percent a year and will add 100,000 people in the next five years. If the recalculated average scans per MRI increased at the county growth rate, Wake County would reach an average of 4,976 in 2016, enough to justify one more MRI scanner.

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VALUE PROVIDER

Advanced capabilities among Raleigh Radiology professionals, along with the radiologists' involvement in continuous training, and commitment to American College of Radiology accreditation for all available modalities assure high quality services. The combination of low cost to patients and quality makes Raleigh Radiology the highest value radiology provider in our area. The practice saves patients hundreds, sometimes thousands, of dollars for the same scan. This is why the joint venture of Key IPA and WakeMed selected Raleigh Radiology as their preferred accountable care organization (ACO) provider. An ACO only succeeds if the total cost of patient care is below the area benchmark set by CMS. The Key IPA relationship is one reason why, Raleigh Radiology's Cary MRI unweighted scans went from 3,792 in 2013 to an annualized 5,677 based on the first 6 months of 2015.

Using data comparison from the Blue Cross, online tool for the same procedure, our patients and we find Raleigh Radiology is the best value choice. We are less expensive than at least four other providers who serve the public: A comparison of the same type of scans showed: Provider A was \$1421, Provider B, \$1599; Provider C, \$1350; and Raleigh Radiology was \$1025. The highest cost 60 percent more. Two of the comparisons were hospitals; one was a different freestanding radiology practice. Locations listing lower patient cost than Raleigh Radiology named individual providers who work at different sites. This leads us to believe that, in those cases, the tool may reflect what Blue Cross pays, not the charge. We found this true for one Raleigh Radiology physician listed on the site.

Raleigh Radiology charges in this comparison are Global, thus include the MRI scan and the physician fee. In fact, Blue Cross pays Raleigh Radiology substantially less by contract. Medicare and Medicaid have set fees. They pay Raleigh Radiology a Global rate that is less than a hospital outpatient rate, not including the physician fee.

Recognizing the increasing number of patients who have high deductible and co-payments in their insurance plans, the practice has developed payment plans and discounts to make it possible for people to get the diagnostic information they need for treatment planning.

DECLINING PAYMENTS, RISING COSTS.

Reimbursement for radiology procedures has been declining for years. Since 2006, Medicare has been reducing reimbursement for imaging services. Between 2013 and 2014, <u>Medicare</u> Relative Value Units (RVUs) for the technical component of certain high-volume MRI procedures <u>decreased</u> by 35 percent to 55 percent, depending on the procedure.

During that same time, Raleigh Radiology's payment to Alliance increased by two factors: a two percent annual CPI factor, and extra charges associated with schedule adjustments that were needed to accommodate the increasing numbers of patients who were requesting services. While increased staffing would reasonably add cost because the staff are contracted, each increased staff hour includes additional Alliance overhead and profit cost.

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ACCESSIBLE

Raleigh Radiology is also a safety net provider. The practice provides deep discounts to uninsured patients. If it can drive out more cost, it can expand these benefits.

Our access is good. We schedule 72 hours a week, well above the 66-hour CON requirement. Our latest proposed contract with Alliance increases hours of operation to 90, but at a very high cost.

The lease agreements provide less flexibility with operating hours than an owned scanner. When staff work for the provider, it can run the scanner as often as needed. Based on our recent growth rates, with more hours, Raleigh Radiology determined that it could, like the Cedarhurst site that it provides interpretations for, complete as many as 7,000 weighted scans a year.

With this petition, are letters from referring physicians supporting this request and attesting to the value nature of the Raleigh Radiology service.

CONTRACT BARRIER

Raleigh Radiology asked Alliance if the company would consider selling the MRI units, but the CONs drive up the value so much that price of both CON and MRI is far too high to make purchase financially feasible.

As demonstrated in this petition, the SMFP methodology is very conservative. With no inducement to self-refer, Raleigh Radiology has demonstrated with a contract scanner that it can do more procedures than the required Wake County threshold for a new scanner. This has occurred even though the county had 20 to 21 fixed equivalent MRI sites in 2014. Patients had choice and they chose Raleigh Radiology. However, Raleigh Radiology remains locked in by the SMFP to extraordinarily high costs to provide the service.

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STATEMENT OF ADVERSE EFFECTS ON PROVIDERS AND CONSUMERS IF THE ADJUSTMENT IS NOT MADE

For patients like "Robert," who has chronic bilateral knee pain, medial meniscus tear in one knee and osteoarthritis, a condition that requires numerous visits to specialists and continual medication, value is critical. Robert works full time in IT, moving equipment, checking out equipment malfunctions, often crawling around in uncomfortable positions. He has a high deductible Blue Cross plan; cannot afford to be out of work; his medical costs are high; and he needs to minimize cost for MRIs. Raleigh Radiology provides the high value service.

Robert's experience is typical and highlights why the special need is justified. Quite simply, Raleigh Radiology is providing the best value with a very high cost structure, and needs relief. If Raleigh Radiology were to stop offering services, patients would be forced to choose higher charge providers. Raleigh Radiology will be unable to offer full service options to its patients if Alliance Healthcare Services. chooses not to renew the contract or, if the proposed terms are out or reach.

Raleigh Radiology is unique: a high volume, high value provider <u>restricted by the Plan from helping our patients</u>. A special need would provide relief for Wake County until the methodology generates need for additional scanners, which could take years. If granted the related CON, Raleigh Radiology will have lower costs per scan and work to pass those savings on to patients; improve access through better hours; and improve quality by taking efficiency gains and putting them back into quality initiatives.

Asking Raleigh Radiology patients to go to other Raleigh Radiology locations would put a major travel burden on people already burdened. Anyone who has traveled across Wake County during the many road repairs on the Interstate or even rush hour and mid-day traffic, knows that it can take an hour to traverse the county.

The practice uses revenue from MRI to offset costs of services for which reimbursement is low, like DEXA scans, and some mammography.

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STATEMENT OF ALTERNATIVES CONSIDERED AND FOUND NOT FEASIBLE

OVERVIEW

Without a special need, when the grandfathered lease is up at the end of 2016, Raleigh Radiology will face difficult choices: stop the service, reduce the hours to keep costs within the range of declining payments, or risk subsidizing the service.

ASK FOR A LARGER NEED DETERMINATION

If the sole criteria for need were performance of our two scanners, Raleigh Radiology would ask for two additional MRI scanners in Wake County. Raleigh Radiology fears that the SHCC would view such a request as too ambitious. Rather than risk rejection, Raleigh Radiology is making a more conservative request.

At current MRI growth rates, and because of the structure of the methodology, it will take years for Wake County to show a need. Each time a location increases its volume, its fixed equivalents increase, thus increasing the denominator in the equation.

EXTEND CONTRACT WITH ALLIANCE, RISK SUBSIDIZING THE SERVICE OR LOOK FOR ANOTHER VENDOR

To keep service available, and maintain low cost options in Wake County, Raleigh Radiology would extend the lease with Alliance Healthcare Services.. The high cost may limit the software options that Raleigh Radiology can afford to purchase, will put constraints on staffing flexibility and will require Raleigh Radiology to purchase more overtime than it needs.

No other vendor has the grandfathered option to offer a fixed site. Alliance faces no state regulatory pressure to keep its costs low and no completive pressure from other vendors to keep lease costs down.

With staff employed by someone else, Raleigh Radiology will sustain extra costs for oversight of staff capabilities. This is particularly burdensome because of the frequency with which contract staff change. As many as six different persons may staff the equipment in the course of one month

Presently, to sustain the service, the only option available is this one.

When asked to sell the equipment and related Certificate of Need rights, Alliance indicated that the rights were too valuable for the company to sell them.

CANCEL OR REDUCE THE SERVICE TO CONTROL COST

Cancelling the service would not be good patient care. It would mean that some of our patients could be required to go to more than one location to get the full battery of imaging services they may require.

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OBTAIN A SPECIAL NEED WITH THE OPTION TO COMPETE TO OFFER A MORE COST EFFECTIVE SERVICE

Given the circumstances, this is the best available option. If Raleigh Radiology can compete for and win a Certificate of Need, it can offer more flexible hours for patients, maintain better control over staff credentialing and training, better synchronize its protocols with staff training and contain costs, thus continuing to offer patients a value alternative.

EVIDENCE OF NON-DUPLICATION OF SERVICES

A special need in Wake County would conceivably involve no duplication of MRI services in Wake County. Raleigh Radiology would apply to replace existing capacity. Alliance Healthcare Services. would have the business option of taking the unit to another location. However, that location would have to find the terms and the need in its area sufficient to justify the lease.

This option could provide the best of all worlds, allowing the state to determine if other locations, in fact need the flexibility associated with the grandfathered scanner.

EVIDENCE OF CONSISTENCY WITH NORTH CAROLINA STATE MEDICAL FACILITIES PLAN

BASIC GOVERNING PRINCIPLES

1. Safety and Quality

This basic principle notes:

- "...priority should be given to safety, followed by clinical outcomes, followed by satisfaction.
- "...As experience with the application of quality and safety metrics grows, the SHCC should regularly review policies and need methodologies and revise them as needed to address any persistent and significant deficiencies in safety and quality in a particular service area."

Raleigh Radiology maintains American College of Radiology accreditation for imaging modalities at all locations. Certification requires regular quality reviews of the interpretations and the quality of the images.

Having multiple subspecialties in its radiology practice, Raleigh Radiology can provide patients with expertise targeted to their specific conditions. This expertise is part of the practice and does not come with an extra charge to the patient.

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2. Access

This basic principle notes:

- "...The first priority is to ameliorate economic barriers and the second priority is to mitigate time and distance barriers.
- "...The SHCC planning process will promote access to an appropriate spectrum of health services at a local level, whenever feasible under prevailing quality and value standards."

Raleigh Radiology has demonstrated that it will accept all insurance coverage, including Medicare and Medicaid, and it offers both a charity policy and payment plans for persons with limited ability to pay. Raleigh Radiology has already demonstrated its willingness to sustain scheduled appointments beyond the normal working day to make services more accessible to patients.

As noted earlier, without the option of owning, Raleigh Radiology will be limited with regard to the cost advantages it can offer patients.

3. Value

This basic principle notes:

"The SHCC defines health care value as the maximum health care benefit per dollar expended.

- "...Cost per unit of service is an appropriate metric...
- "...At the same time overutilization of more costly and/or highly specialized low-volume services without evidence-based medical indication may contribute to escalating health costs without commensurate population-based health benefit."

Presently, cost per unit of service is a barrier to Raleigh Radiology. Approval of the request would provide a mechanism by which, at current volumes, Raleigh Radiology would save \$530,000 a year if it owned and staffed its scanner.

After vetting all of the available providers in Wake County, the only accountable care organization, chose Raleigh Radiology because of its value proposition to the patient and the patient's physician. It is noteworthy that the hospital member of the ACO chose Raleigh Radiology over the hospital MRI.

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CONCLUSION

We are asking for a special need determination for one fixed MRI scanner in Wake County. The request is in keeping with the governing principles in the *State Medical Facilities Plan* of maximizing quality, access, and value.

The proposed changes are consistent with and support the Basic Principles that govern the SMFP.

ATTACHMENTS:

MRI Cost Analysis Pro Forma: Raleigh Radiology Cary, January 2015 – May 2015	. A
Letters of Support	. E
Complete List of Alliance Healthcare Services North Carolina MRI Scanners	. (

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Attachment A

Magnetic Resonance Imaging Cost Analysis Pro Forma Raleigh Radiology Cary, January 2015 – May 2015

MRI costs analysis pro forma CARY, Jan-May 2015

			RRLLC owned		annualized
	actual Jan-May	RRLLC	MRI	cost reduction	savings
	RRLLC income statement	incremental cost	total cost	over current	over current
MRI Expense Alliance	470,206		0		
MRI lease payment		102,775	102,775		
MRI service		75,000	75,000		
Total Raleigh Radiology Cary MRI	\$ 727,148	\$ 248,620	\$ 505,563	\$ 221,585	\$ 531,805

Assumptions

RI tech

\$34 hr 12 hr day 6 days week (72 hrs) **Current operation**

MRI FTE needs

1.8 128 operational days Jan-May

total hours: 1,536

\$1.5M MRI for 7 yrs at 4%

finance:

\$15,000 month Total Procedures last 4Q Cary: 5,603 savings per scan \$94.91 service:

savings per scan

Attachment C

Complete List of Alliance Healthcare Services
North Carolina MRI Scanners

Data Matrix of All Alliance Owned MRIs Registered in NC, 2015 Data

	Data source: Registration an	d Inventory of Med	lical Equipment, Mobile MRI, 2	Data source: Registration and Inventory of Medical Equipment, Mobile MRI, 2015; as submitted by owners on or before January 30, 2015	January 30, 20	115				Data Source: SMFP Tal	Data Source: SMFP Table 9P, Proposed 2016 Draft, 6/3/15	Draft, 6/3/15
No.	Owner	Manufacturer	Model	Serial Number	Grand- fathered	# NOO	Service Area (County)	Service Area (Location) r	Service Area (Location) rs in Operation for Repor	County Served	# of Procedures	Mobile / Fixed
1	Alliance Healthcare Services	Siemens 1.5T	Espree	#30707 ESP 21	yes		Wake	Raleigh Radiology	3,060	Wake	4545	Free Standing Fixed
							Alamance	UNC	311	Alamance	341	
							Forsyth	Cone Health Med Ctr	108	Forsyth	114	
2	Alliance Healthcare Services	Siemens 1.5T	Espree	#30916 ESP 27	yes		Guilford	Carolina Neuro & Spine	851	Guilford	940	Mobile
							Guilford	Moses Cone	654	Guilford	710	
							Wake	Wake Radiology Svcs	26	Wake	3681	
8	Alliance Healthcare Services	Siemens 1.5T	Espree	#31190 ESP 36	yes		Wake	Raleigh Radiology	no data	Wake	4858	Mobile
							Chatham	Chatham Hospital	461	Chatham	498	
4	Alliance Healthcare Services	GE 1.5T	Signa Horizon ES LX	1KKVA48283L211004 SIGNA 470	yes		Guilford	Greensboro Spine & Scoliosis Ctr	219	Guilford	225	Mobile
							Person	Person County Hospital	719	Person	797	
							Cleveland	Miller Ortho	912	Cleveland	912	
							Mecklenburg	OrthoCarolina	17	Mecklenburg	17	
							Mecklenburg	OrthoCarolina - Matthews	1,265	Mecklenburg	1265	
25	Alliance Healthcare Services	GE 1.5T	Signa Horizon ES LS	159FA482061182880 SIGNA 432	yes		Mecklenburg	Randolph Spine Center	1,509	Mecklenburg	1593	Mobile
							Mecklenburg	OrthoCarolina	20	Mecklenburg	20	
							Scotland	OrthoCarolina	1,322	Scotland	1322	
							Union	OrthoCarolina	447	Union	885	
9	Alliance Healthcare Services	GE 1.5T	Signa Horizon ES LX	1S9FA482061182958 SIGNA 438	yes		Pitt	Orthopaedics East Inc.	2,220	Pitt	2232	Mobile

	Data source: Registration and	l Inventory of Med	lical Equipment, Mobile MRI,	Data source: Registration and Inventory of Medical Equipment, Mobile MRI, 2015; as submitted by owners on or before January 30, 2015	January 30, 201	51				Data Source: SMFP Table 9P, Proposed 2016 Draft, 6/3/15	ile 9P, Proposed 2016	Draft, 6/3/15
N O	Owner	Manufacturer	Model	Serial Number	Grand- fathered	# NOO	Service Area (County)	Service Area (Location)	Service Area (Location) rs in Operation for Report	County Served	# of Procedures	Mobile / Fixed
							Cabarrus	OrthoCarolina	1,826	Cabarrus	1900	
							Gaston	OrthoCarolina	746	Gaston	746	
r	Alliance Healthcare		> 0	150EA ACODOSTOCE CLONIA ACA			Mecklenburg	OrthoCarolina - Charlotte	1,296	Mecklenburg		(; ; ; ; ; ; ; ; ; ; ; ; ; ; ; ; ; ; ;
`	Services	GE 1.31	HOIIZOII ES LA		Si A		Mecklenburg	OrthoCarolina- Matthews	43	Mecklenburg	43	
							Scotland	OrthoCarolina	20	Scotland	50	
							Union	OrthoCarolina	885	Union	447	
							Buncombe	Asheville Ortho Assoc	154	Buncombe	481	
							Buncome	Park Ridge Hospital	457	Buncome	16	
							Davie	Davie County Hospital	10	Davie	415	
∞	Alliance Healthcare Services	GE 1.5T	Signa Horizon ES LX	1S9FA482141182724 SIGNA 404	yes		Henderson	Laurel Park Med Ctr	145	Henderson	13	Mobile
							Iredell	Northshore Ortho	13	Iredell	378	
							Macon	WestCare Health	153	Macon	158	
							Watauga	OrthoCarolina - Boone	457	Watauga	32	
6	Alliance Healthcare Services	GE 1.5T	Horizon ES LX	1S9FA482171183120 SIGNA 447	yes		Guilford	SE Orthopaedic Specialists	4,132	Guilford	4826	Mobile

	Data source: Registration an	d Inventory of Mec	dical Equipment, Mobile MRI,	Data source: Registration and Inventory of Medical Equipment, Mobile MRI, 2015; as submitted by owners on or before January 30, 2015	January 30, 20	015				Data Source: SMFP Table 9P, Proposed 2016 Draft, 6/3/15	ole 9P, Proposed 2016 I	Oraft, 6/3/15
No.	Owner	Manufacturer	Model	Serial Number	Grand- fathered	# NOO	Service Area (County)	Service Area (Location)	Service Area (Location) rs in Operation for Repor	County Served	# of Procedures	Mobile / Fixed
							Columbus	Atlantic Radiology Assoc.	295	Columbus	297	
							Duplin	Duplin General Hospital	80	Duplin	6	
							Durham	Atlantic Radiology	2			
							Halifax	Atlantic Radiology	738	Halifax	760	
,	Alliance Healthcare	į.	>	4 00 A MAY 13 TEXT COLECTION A TOTAL			Harnett	Atlantic Radiology - Lillington	307	Harnett	329	1 1 1 2 4
O I	Services	de 1.51	40112011 E3 LV	139FA4662531 182017 31GNA 284	Si A		Johnston	Eastern Carolina Med Ctr	71	Johnston	11	9 000
							Nash	Atlantic Radiology	187	Nash	187	
							Nash	Carolina Regional Ortho	284	Nash	284	
							New Hanover	Atlantic Radiology	12	New Hanover	13	
							Wake	Triangel Ortho	101	Wake	101	
,	Alliance Healthcare	5	S Criscian	304 MINOTO 345C0144 CC04 A 3034	9		Catawba	Hickory Ortho	2,204	Catawba	2289	4 4
=	Services	C:T	101 KOI IIIIIII	COF MADIC 102/10 21/201 402	S Q		Watauga	OrthoCarolina - Boone	1,328	Watauga	1334	ν Ε Ε Ε
12	Alliance Healthcare Services	GE 1.5T	Signa Horizon ES LX	1S9FA48233182609 SIGNA 280	yes		Guilford	SE Orthopaedic Specialists	15	Guilford	15	Mobile
							Davie	Davie County Hospital	383	Davie	11	
ç	Alliance Healthcare	F	>- 20 active a conit	160EA4004E1103703 CLGNIA 413	30,7		Iredell	Northshore Ortho	378	Iredell	13	4
CT	Services		סופוומ נוסוקסון בס בע	1077 A4024 1107/00 50 50 50 50 50 50 50 50 50 50 50 50 5	Si A		Iredell	Piedmont Healthcare	858	Iredell	971	D
							Mecklenburg	Randolph Spine Center	13	Mecklenburg	15	
14	Alliance Healthcare Services	GE 1.5T	Signa Horizon ES LX	1S9FA482531182594 SIGNA 270	yes		New Hanover	WHA Medical Clinic	2,856	New Hanover	3332	Mobile

	Data source: Registration and	d Inventory of Med	ical Equipment, Mobile MRI,	Data source: Registration and Inventory of Medical Equipment, Mobile MRI, 2015, as submitted by owners on or before January 30, 2015	January 30, 20	015				Data Source: SMFP Table 9P, Proposed 2016 Draft, 6/3/15	le 9P, Proposed 2016	Draft, 6/3/15
No.	Owner	Manufacturer	Model	Serial Number	Grand- fathered	# NOO	Service Area (County)	Service Area (Location)	Service Area (Location) rs in Operation for Repor	County Served	# of Procedures	Mobile / Fixed
							Halifax	Atlantic Radiology Assoc	15			
							Johnston	Eastern Carolina Med Ctr	10	Johnston	75	
							Martin	Martin General	14	Martin	15	
15	Alliance Healthcare Services	GE 1.5T	Signa Horizon ES LX	1S9FA482X41182706 SIGNA 403	yes		Wake	Duke Radiology - Knightdale	334	Wake	372	Mobile
							Wake	MS Imaging of NC	304	Wake	312	
							Wake	Triangle Ortho	356	Wake	358	
							Wake	Duke Raleigh - Cary	237	Wake		
							Durham	Raleigh Neurology	457	Durham	562	
							Onslow	Onslow Memorial	231	Onslow	231	
16	Alliance Healthcare Services	Siemens 1.5T	Magnetom Espree	1S9FA482X91183328 ESP 28	yes		Wake	WakeMed - Apex	400	Wake	108	Mobile
							Wake	WakeMed - Garner	154		117	
							Wake	WakeMed - Raleigh Med Park	308	Wake	353	
17	Alliance Healthcare Services	Siemens 1.5T	Symphony	21216 SYM 68	yes		Wake	Wake Radiology - Gamer	2,444	Wake		Free Standing Fixed
18	Alliance Healthcare Services	GE 1.5T	Signa HDe 8 Channel	2467 SIGNA 467	yes		Wake	Raleigh Neurology Imaging	4,382	Wake	5133	Free Standing Fixed
19	Alliance Healthcare Services	Siemens 1.5T	Symphony	27478 SYM 66	yes		Wake	Wake Radiology Diagnostic	3,245	Wake	26	Free Standing Fixed
20	Alliance Healthcare Services	GE 1.5T	Signa HDe 8 Channel	30120144481 SIGNA 465	yes		Brunswick	Dosher Memorial	1,104	Brunswick	1267	Mobile
							Brunswick	NHRMC - Brunswick	422	Brunswick	424	
2,1	Alliance Healthcare	1 1 0 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	Signs Horizon ESTV	1C0EAA870E118770E CIGNA A1E	G	E-7001-04	New Hanover	NHRMC	353	New Hanover	412	olido.
1	Services				2		New Hanover	NHRMC - Porters Neck	506	New Hanover	572	
							Pender	Pender Memorial	228	Pender	260	

	Data source: Registration and	I Inventory of Med	ical Equipment, Mobile MRI,	Data source: Registration and Inventory of Medical Equipment, Mobile MRI, 2015; as submitted by owners on or before January 30, 2015	January 30, 2	015			_	Data Source: SMFP Table 9P, Proposed 2016 Draft, 6/3/15	ole 9P, Proposed 2016	Draft, 6/3/15
No.	Owner	Manufacturer	Model	Serial Number	Grand- fathered	# NOO	Service Area (County)	Service Area (Location)	Service Area (Location) rs in Operation for Repor	County Served	# of Procedures	Mobile / Fixed
							Alleghany	Alleghany Memorial Hospital	143	Alleghany	150	
							Avery	Cannon Memorial	477			
22	Alliance Healthcare Services	GE 1.5T	Signa Horizon ES LX	1S9FA482231182364 SIGNA 294	ou	G-7038-04	Buncome	Park Ridge Hospital		Buncome	468	Mobile
							Franklin	WestCare Health	34	Franklin	36	
							Henderson	Laurel Park Medical Ctr	12	Henderson	152	
23	Alliance Healthcare Services	GE 1.5T	Horizon Infinity ES LX	1S9FA4824811183226 SIGNA 456	ou	F-6957-03	Iredell	Piedmont Healthcare PA	3,050	Iredell	3787	Free Standing Fixed
							Alamance	UNC	243	Alamance	261	
,	Alliance Healthcare	100	Evrita O Channol	1 CDEA AODEA 1107 DA CIGNIA ADT	Ċ	00 1209	Cleveland	MRI Specialists of the Carolinas	327	Cleveland	347	M
ţ	Services				2		Forsyth	WFBH Med Plaza	952	Forsyth	1004	
							Yadkin	Yadkin Valley Community Hosp	78	Yadkin	83	
							Beaufort	Vidant Pungo Hospital	99	Beaufort		
Ĺ	Alliance Healthcare	, ,					Duplin	Duplin General Hospital	823	Duplin	1018	
5	Services	GE I.S.I	Horizon immity ES LX	159FA48285118274U SIGNA 4UD	0	Q-6884-03	Martin	Martin General	526	Martin	562	Mobile
							Washington	Washington County Hospital	56	Washington	28	
26	Alliance Healthcare Services	GE 1.5T	Signa Horizon ES LX	SIGNA 466	ou	D-8162-08	Ashe	Ashe Memorial	796	Ashe	940	Hospital Fixed
27	Alliance Healthcare Services	GE 1.5T	Horizon Infinity ES LX		ou	Н-6845-03	Moore	Pinehurst Surgical Clinic	3,060	Moore	4830	Free Standing Fixed

Grandfathered MRI scanners	Non-Grandfathered MRI scanners, CON # included