

## PETITION

### **Petition for an Adjusted Need Determination for One Additional Fixed Magnetic Resonance Imaging Scanner in Caldwell County in the 2023 State Medical Facilities Plan**



#### **Petitioner**

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#### **Statement of Requested Adjustment**

EmergeOrtho respectfully petitions the State Health Coordinating Council (SHCC) to include an adjusted need determination in the 2023 State Medical Facilities Plan (SMFP) for one additional Fixed Magnetic Resonance Imaging (MRI) scanner in the Caldwell County service area.

#### **Background**

EmergeOrtho is the largest physician-owned orthopedic practice in North Carolina. EmergeOrtho's medical team includes over 270 highly-trained orthopedic specialists and physicians, as well as advance practice providers. Our subspecialty orthopedic teams offer advanced expertise in conditions of the bones, muscles, and joints, and our subspecialty orthopedic services are currently offered in five regions throughout North Carolina. In the

Foothills Region, EmergeOrtho operates clinics located in Caldwell County, specifically in Lenoir and in Granite Falls. Historically, EmergeOrtho has served a significant number of MRI patients from Caldwell County. During the 12-month period of June 1, 2021 through May 31, 2022, EmergeOrtho performed 5,393 MRI procedures on patients living in the Foothills region (e.g. Alexander, Burke, Caldwell, Catawba, and McDowell counties), including 1,376 outpatient MRI scans performed on Caldwell County residents. Based on its extensive experience providing healthcare services in the Foothills region, including Caldwell County, EmergeOrtho considers that there is a great need for improved local access to fixed MRI services for residents of Caldwell County.

**Reasons supporting the Requested Adjustment**

Several important factors support the need for an additional fixed MRI scanner in Caldwell County, including:

1. Population growth and aging;
2. MRI utilization and outmigration;
3. Lack of competition and no freestanding fixed MRI scanner.

Population Growth and Aging in Caldwell County

Shown in the table below is the current 2022 and projected 2027 population of Caldwell County, categorized by age cohorts.

**Caldwell County Population Growth by Age Cohort**

Age Group	2022 Population	2022 Percent of Total Population	2027 Population	2027 Percent of Total Population	5-Yr CAGR
0-17	15,151	19.0%	14,785	18.6%	-0.5%
18-44	25,847	32.3%	26,322	33.1%	0.4%
45-64	22,284	27.9%	20,530	25.8%	-1.6%
65+	16,664	20.8%	17,984	22.6%	1.5%
Total	79,946	100.0%	79,621	100.0%	-0.1%

Source: North Carolina Office of State Budget and Management (NCOSBM), Vintage 2021

Although the projected population growth for Caldwell County is flat, it is important to note that NCOSBM projects that the 18-44 and 65+ age groups will increase in population through 2027. The 18-44 age cohort is a significant user of MRI services because of how physically active they are, with many participating in outdoor adventure, exercise and other physical activities. Unfortunately, being so active also makes people more susceptible to injuries, some of which are diagnosed with MRI services. The age cohort of 65+ has a high demand for healthcare services, as older residents are remaining physically active, and also living longer and thus susceptible to disease and injury. A large number of older residents, roughly 82%, develop at least one chronic disease that must be managed by healthcare services on a consistent basis, as well as other orthopedic needs. It is imperative that adequate access to healthcare services exists in areas where the population of residents 65 and older is large and increasing. Importantly, the 65+ age cohort makes up just under 15% of Wake County, while in Caldwell County the elderly represent over 20% of the county population, and that figure is projected to increase to 22.6% by 2027, as shown in the previous table. This population data indicates a need for an additional fixed MRI scanner in Caldwell County.

**MRI Utilization and Outmigration**

According to calculations shown in Tables 17E-1 and 17E-2 of the Proposed 2023 SMFP (reproduced below), using the standard need methodology, there is a shortage of just 638 weighted MRI scans to meet the need threshold of 4,368 for one additional fixed MRI scanner for Caldwell County.

**Table 17E-1, Proposed 2023 SMFP**

Caldwell	Hospital Fixed	E-007222-05	Caldwell Memorial Hospital	1	1.00	2,646	1,372	699	424	151	3,310
Caldwell	Mobile	E-008230-80	EmergeOrtho-Lenoir (EmergeOrtho, PA)	0	0.34	1,475	1,397	78	0	0	1,492
<b>Caldwell</b>				<b>1</b>	<b>1.34</b>	<b>4,121</b>					<b>4,802</b>

**Table 17E-2: MRI Need Determinations by Service Area**

**Proposed 2023 SMFP**

A Service Area	B Adjusted Scans			C Average Annual Change Rates	D AACR Projected Scans	E Population Growth	F Population Growth Used	G Population Projected Scans	H Fixed Equiv	I Average Scans	J Threshold	K MRI Need
	2018	2019	2021									
Alamance	10,607.2	11,226.3	12,239.0	0.0743	13,148.2	0.0321	0.0321	13,570.7	3.25	4,178.7	4992	0
Alexander	0.0	0.0	0.0	0.0009	0.0	-0.0078	0.0000	0.0	0.00	0.0	1872	0
Alleghany	105.3	19.6	0.0	-0.9068	0.0	-0.0016	0.0000	0.0	0.00	0.0	1872	0
Anson	71.0	114.6	106.0	0.2698	134.6	-0.0093	0.0000	134.6	0.00	0.0	1872	0
Ashe	1,190.9	903.4	779.6	-0.1892	632.1	-0.0082	0.0000	632.1	1.00	632.1	4368	0
Avery	389.4	203.0	0.0	-0.7394	0.0	-0.0010	0.0000	0.0	0.00	0.0	1872	0
Beaufort	2,295.9	2,437.8	2,820.8	0.1095	3,129.6	-0.0235	0.0000	3,129.6	1.00	3,129.6	4368	0
Bertie	0.0	0.0	0.0	0.0000	0.0	-0.0261	0.0000	0.0	0.00	0.0	1872	0
Bladen	779.7	711.3	316.6	-0.3213	214.9	-0.0552	0.0000	214.9	0.00	0.0	1872	0
Brunswick	8,880.3	8,233.6	12,139.3	0.2008	14,576.5	0.0693	0.0693	15,586.8	2.84	5,495.8	4992	1
Buncombe/Graham/Madison/Yancey	44,128.0	49,273.3	47,045.8	0.0357	48,725.2	0.0301	0.0301	50,189.5	12.03	4,171.8	4992	0
Burke	8,191.6	9,644.0	9,066.7	0.0587	9,599.1	-0.0046	0.0000	9,599.1	2.73	3,521.1	4992	0
Caldwell	4,511.6	4,135.3	4,802.0	0.0389	4,988.9	-0.0052	0.0000	4,988.9	1.34	3,729.5	4368	0
Carteret	7,151.2	5,601.8	8,157.7	0.1188	9,155.0	0.0018	0.0018	9,151.2	2.13	4,293.3	4992	0
Catawba	18,387.3	20,815.0	21,201.5	0.0753	22,798.0	0.0229	0.0229	23,320.4	5.37	4,339.3	4992	0
Chatham	798.8	909.4	878.9	0.0525	925.0	0.0488	0.0488	970.2	0.00	0.0	1872	0
Cherokee/Clay	1,884.9	2,011.3	2,287.6	0.1022	2,521.4	0.0254	0.0254	2,585.4	1.00	2,585.4	4368	0
Chowan	2,243.6	2,111.8	2,138.8	-0.0230	2,089.6	-0.0018	0.0000	2,089.6	1.00	2,089.6	4368	0
Cleveland	8,015.0	8,798.0	10,357.5	0.1375	11,781.4	0.0194	0.0194	12,010.4	2.19	5,488.5	4992	1
Columbus	2,948.5	3,123.0	3,212.3	0.0439	3,353.3	-0.0552	0.0000	3,353.3	1.00	3,353.3	4368	0
Craven/Jones/Pamlico	14,888.6	14,265.0	16,809.6	0.0682	17,956.8	-0.0098	0.0000	17,956.8	4.00	4,489.2	4992	0
Cumberland	33,933.1	29,389.2	33,507.4	0.0031	33,611.6	0.0002	0.0002	33,618.1	7.01	4,794.1	4992	0
Dare	2,665.1	2,541.1	2,529.9	-0.0255	2,465.4	0.0320	0.0320	2,544.3	1.00	2,544.3	4368	0
Davidson	6,762.2	6,702.2	7,437.1	0.0504	7,811.9	0.0199	0.0199	7,967.1	2.00	3,983.5	4992	0
Davie	2,248.2	2,471.2	3,062.2	0.1692	3,580.3	0.0324	0.0324	3,696.4	1.37	2,704.5	4368	0
Duplin	1,611.8	1,733.1	1,846.4	0.0703	1,976.3	-0.0680	0.0000	1,976.3	0.72	1,976.3	1872	1
Durham/Caswell	80,632.7	83,142.0	86,748.0	0.0372	89,979.0	0.0395	0.0395	93,537.6	16.97	5,512.2	4992	1
Edgecombe	2,659.1	2,864.2	2,502.4	-0.0246	2,440.8	-0.0332	0.0000	2,440.8	1.00	2,440.8	4368	0
Foxsyth	87,216.9	93,662.7	92,123.9	0.0287	94,771.4	0.0243	0.0243	97,077.5	20.52	4,730.4	4992	0
Franklin	0.0	0.0	40.3	0.0000	40.3	0.0694	0.0694	43.1	1.00	43.1	4368	0
Gaston	23,534.8	23,009.0	23,458.0	-0.0014	23,424.8	0.0188	0.0188	23,864.5	6.28	3,801.0	4992	0
Granville	1,617.9	1,741.4	2,004.6	0.1137	2,232.5	0.0332	0.0332	2,306.5	1.14	2,025.1	4368	0
Guilford	68,049.2	64,803.5	65,997.5	-0.0146	65,031.5	0.0298	0.0298	66,969.6	15.02	4,460.1	4992	0
Halifax/Northampton	2,491.3	2,503.8	2,243.1	-0.0495	2,132.0	-0.0313	0.0000	2,132.0	1.00	2,132.0	4368	0
Harnett	4,055.3	4,160.8	4,474.9	0.0507	4,702.0	0.0365	0.0365	4,873.8	2.19	2,228.8	4992	0
Haywood	5,107.8	5,166.2	4,845.7	-0.0253	4,723.1	0.0185	0.0185	4,810.6	2.00	2,405.3	4992	0

However, an important factor that the SMFP fixed MRI scanner standard methodology does not take into account is how many MRI scans performed on residents of Caldwell County are occurring in other counties. As shown in Table 17E-1 of the Proposed 2023 SMFP (previously shown), Caldwell County currently hosts only one fixed MRI scanner, located at Caldwell Memorial Hospital (CMH). The only other access to MRI services within Caldwell County is a mobile MRI service hosted by EmergeOrtho. As shown in the previous Table 17E-1, during FFY2021 EmergeOrtho performed 1,492 weighted MRI scans at that part-time mobile location (only Monday and Sunday each week). The lack of MRI capacity generally, and specifically the lack of a freestanding fixed MRI scanner in Caldwell County, results in many Caldwell County residents leaving the county to obtain MR imaging elsewhere.

The cost of care for MRI service is greater in Caldwell County due to the county's only fixed MRI scanner being located within CMH. Hospital-based MRI scans are more expensive due to higher

overhead hospital costs. Freestanding diagnostic imaging centers have lower overhead costs and thus lower patient charges. Having a freestanding fixed MRI scanner in Caldwell County would benefit county residents by providing full-time access to MRI services at a lower cost of service, thus supporting the SMFP goal of providing value in the delivery of care.

SHCC approval of this petition would enable improved access to value-based MRI services for Caldwell County residents who have been forced to travel to obtain MRI service. Data from the Fixed MRI Patient Origin Report compiled by the Department of Health Service Regulation (DHSR) portrays statistics of where Caldwell County residents receive MRI scans. During FY2021 (most recent data available), only 3,356 of 7,347 (45.68%) scans performed on Caldwell County residents actually occurred in Caldwell County.

### **FY2021 Caldwell County MRI Patient Origin Report**

#### **Caldwell**

Caldwell	3356	45.68%
Catawba	1722	23.44%
Burke	1336	18.18%
Forsyth	371	5.05%
Mecklenburg	125	1.70%
Buncombe	107	1.46%
Watauga	77	1.05%
Iredell	56	0.76%
Durham	42	0.57%
Orange	39	0.53%
Gaston	25	0.34%
Wilkes	24	0.33%
Davie	22	0.30%
Lincoln	15	0.20%

Source: DHSR 2022 MRI Patient Origin Report by County of Origin

In other words, nearly 55% of Caldwell County residents left Caldwell County to obtain an MRI scan. This data is a key indicator that Caldwell County residents would greatly benefit from an additional fixed MRI scanner to enable more residents to be able to obtain care within the county, and reduce the need to travel to another county.

Given that during FFY2021 3,991 Caldwell County MRI patients obtained their MRI scans outside Caldwell County, if only 25% or 998 (3,991 x .25) of these patients returned to Caldwell County to obtain an MRI scan, the Proposed 2023 SMFP would have shown a need for an additional fixed MRI scanner in Caldwell County. ( $4,802 + 998 = 5,800 \times 1.0389 = 6,025.62/1.34 = 4,498$ , which exceeds the Caldwell County need threshold of 4,368).

This is why the utilization data used in the SMFP fixed MRI scanner standard need methodology is an incomplete representation of MRI need in Caldwell County. In summary, the Caldwell County MRI scan volume shown in the Proposed 2023 SMFP is not a reflection of lack of local need for MRI services, but rather is an indicator that the status quo of having only one hospital-based fixed MRI scanner and no freestanding fixed MRI scanner is not meeting the needs of Caldwell County residents.

The table below is further evidence that Caldwell County residents have less access to fixed MRI scanner services than residents of most other North Carolina counties with a similar population.

#### Comparison of Fixed MRI Scanners in Similar Sized North Carolina Counties

County	Population	# Fixed MRI Scanners
Moore	103,298	5
Cleveland	101,248	2
Nash	95,246	2
Rockingham	91,078	2
Burke	86,355	2
Lincoln	89,108	3
<b>Caldwell</b>	<b>79,946</b>	<b>1</b>
Wilson	78,963	3
Chatham	78,096	0
Surry	71,113	2
Carteret	67,233	2

Sources: North Carolina Office of State Budget and Management, Vintage 2021; 2022 SMFP

The table above portrays 11 North Carolina counties, with a population similar in size to Caldwell County (population between 67,000 and 103,000). Note that with the sole exception

of Chatham County, the remaining nine counties each have two or more fixed MRI scanners. It is clear that unique circumstances have resulted in a lag in determination of need for adequate fixed MRI scanner capacity for Caldwell County residents.

### Lack of Competition

The SMFP values the idea of a competitive marketplace. Similar to residents of other counties, Caldwell County residents would benefit from local fixed MRI scanner competition. Competition in delivery of healthcare services provides an incentive for providers to become more innovative and to sustain the highest levels of quality in order to gain or maintain trust from local residents and earn their business. This parallels the principle of the “Value” Basic Principle, as stated on page 3 of the Proposed 2023 SMFP, *“long-term enhancement of health care value will result from a State Medical Facilities Plan that promotes... competition.... and encourages innovation in health care delivery...”* Caldwell County has lacked fixed MRI competition, and with a population ranked 34th out of 100 counties in North Carolina, it is a prime county for an additional fixed MRI scanner.

### **Adverse effects on Caldwell County Healthcare Consumers**

Approval of this fixed MRI petition will result in enhanced access to local MR imaging service options. Contrarywise, non-approval of this petition would have an adverse impact on Caldwell County residents. As previously described, within in Caldwell County, residents currently have only one option for access to fixed MRI services: at Caldwell Memorial Hospital, where the MRI service is hospital-based. Costs and charges are much higher in a hospital setting than in a freestanding, non-hospital-based imaging setting. Disapproval of this fixed MRI scanner adjusted need petition would negatively affect the cost of care for Caldwell County residents who need an MRI scan, and thus would be inconsistent with the goals of the SMFP to reduce costs of healthcare services. In addition, with the projected growth of the elderly population in Caldwell County, there may be less availability to MRI services at the hospital, which of course needs to be able to serve not just MRI outpatients, but also emergency patients and inpatients. Because of these factors, referring providers would continue to consider sending patients out of Caldwell County for outpatient MR imaging. And Caldwell County residents would be forced to travel to Catawba or Burke or other counties or pay a significantly higher price for their necessary outpatient imaging procedures.

## **Alternatives to this Petition**

EmergeOrtho considered one alternative to submitting this adjusted need petition:

- Maintain the status quo and wait for an SMFP need determination via the standard methodology

Maintaining the status quo is not an acceptable alternative. Waiting for a future SMFP need determination for an additional Caldwell County fixed MRI scanner represents an uncertain timetable, and would unnecessarily delay an opportunity to provide Caldwell County residents with timely enhanced local access to MR imaging services, and in particular, access to a full-time, freestanding fixed MRI scanner conveniently located within Caldwell County. As previously described, Caldwell County's older population is growing. Caldwell County stands out among North Carolina counties of similar population, in that Caldwell County currently has just one fixed MRI scanner, when the vast majority of similarly sized North Carolina counties have at least two. This of course has resulted in a high outmigration pattern (previously described) among Caldwell County residents needing MR imaging, with many having to travel to Catawba or Burke counties. Also, Caldwell County currently lacks competition in MR services. The need for an additional fixed MRI scanner in Caldwell County is compelling.

## **Evidence of no unnecessary duplication of health resources in the Service Area**

The adjusted need determination proposed in this petition will not result in unnecessary duplication of health resources in the area. Caldwell County does not currently host a freestanding fixed MRI scanner, and in this petition EmmergeOrtho has documented that thousands of MRI scans performed on Caldwell County residents occur in other counties. The proposed fixed MRI need determination would not unnecessarily duplicate the existing hospital-based fixed MRI scanner operating within the county.

## **Consistency with Basic Principles of the SMFP**

### *Safety and Quality*

In the SMFP, the Safety and Quality Basic Principle includes the following statements:

*“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.”*

If the proposed adjustment for an additional fixed MRI scanner in Caldwell County is approved, an established healthcare provider will have the opportunity to apply for a Certificate of Need to develop a fixed MRI scanner in Caldwell County. MRI scanners are used to diagnose orthopedic injuries in a timely manner. The provider would offer MRI services under the watch of professionals who understand the importance of providing quality care to those who reside in their service area. Experienced providers such as EmERGEOrtho take great care in providing this service, as it is vital to resolving health concerns for all people.

As a CON applicant for an additional fixed MRI scanner in Caldwell County, EmERGEOrtho is an experienced local provider of imaging services, and would continue to be dedicated to ensuring quality and patient safety through compliance with all applicable licensure and certification standards established regarding diagnostic imaging. Patient safety and quality would be incorporated into all aspects of development and offering of fixed MRI scanner services in Caldwell County, including equipment selection, facility upfit, staff credentialing and education, patient selection and scheduling, and continuous quality measures and patient satisfaction surveys. EmERGEOrtho would install and operate the fixed MRI scanner in accordance with the manufacturer’s requirements.

EmERGEOrtho would pursue ACR accreditation for a Caldwell County fixed MRI scanner. American College of Radiology (ACR) Accreditation is recognized as the gold standard in medical imaging, and evaluates staff qualifications, image quality, quality control, and safety policies. The quality of images produced on an accredited scanner are submitted to and validated by the American College of Radiology accrediting body. Operating within the compliance standards of ACR reinforces EmERGEOrtho’s commitment to safety, compliance, and excellence in the operation of equipment, quality assurance programs, and employees’ performance.

One of the beneficial aspects of competition is to promote the highest level of quality of care, including patient satisfaction. Without the benefit of competition and continuing the status quo of a monopoly situation in Caldwell County, Caldwell County patients are likely to continue to leave the county when cost effective MRI services are not available or accessible, or if safety and quality are not at the highest standard.

The quality of MRI services provided in Caldwell County would be enhanced because a new fixed MRI scanner would be located in a freestanding imaging clinic that specializes in providing diagnostic imaging. Also, currently some EmERGEOrtho patients from Caldwell County are directed to other healthcare facilities to obtain an MRI scan, which can disrupt any continuity of care, and therefore may lower quality of care. Another fixed MRI scanner in Caldwell County would provide greater access, reliability, and convenience to residents.

With approval of the requested fixed MRI need determination, safety and quality will be improved, while also enabling expanded local access to care and reduced imaging costs for Caldwell County residents. Without the proposed adjusted need determination, there will be no opportunity in the foreseeable future to introduce competition and the associated beneficial impact on safety and quality in Caldwell County.

### Access

In the SMFP, the Access Basic Principle includes the following statements:

*“Equitable access to timely, clinically appropriate and high-quality health care for all the people of North Carolina is a foundational principle for the formulation and application of the North Carolina State Medical Facilities Plan. Barriers to access include . . . geography . . . The formulation and implementation of the Plan seeks to reduce all of these types of barriers to timely and appropriate access. . . . 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.”*

EmerGEOrtho has historically provided care and services to medically underserved populations. EmERGEOrtho does not discriminate based on income, race, ethnicity, creed, color, age, religion, national origin, gender, physical or mental handicap, sexual orientation, ability to pay or any other factor that would classify a patient as underserved. With a fixed MRI scanner located in Caldwell County, EmERGEOrtho would continue to have a policy to provide all services to all patients regardless of income, racial/ethnic origin, gender, physical or mental conditions, age,

ability to pay or any other factor that would classify a patient as underserved. EmergeOrtho is a participating Medicare and Medicaid provider serving the elderly and medically indigent populations in Caldwell County and surrounding communities.

Access to MRI scans in Caldwell County is currently limited due to the only fixed MRI scanner being located at Caldwell Memorial Hospital. EmergeOrtho operates a mobile MRI scanner that serves a host site in Caldwell County in order to improve local access to services. However, while EmergeOrtho has been fortunate to be able to make mobile MRI access available in Caldwell County and the Foothills region, a mobile MRI scanner is not intended to be a long-term solution because it does not provide full-time availability within Caldwell County.

### Value

In the SMFP, the Value Basic Principle includes the following statements:

*“The SHCC defines health care value as the maximum health care benefit per dollar expended. . . Cost per unit of service is an appropriate metric . . . Long-term enhancement of health care value will result from a State Medical Facilities Plan that promotes a balance of competition and collaboration and encourages innovation in health care delivery. The SHCC encourages the development of value-driven health care.”*

Healthcare can be expensive, and when imaging is needed, the cost of the exam should not add to patient anxiety or stress. The cost of imaging exams varies widely, from a few hundred dollars to several thousand dollars, and is often most expensive at hospital-based facilities. As a dedicated freestanding outpatient imaging center with a fixed MRI scanner, EmergeOrtho would offer affordable prices on imaging exams, with the simplicity of one bill with no additional facility or radiologist fee. In the case of EmergeOrtho, patients would benefit directly because of the focus on lower costs, and patients would also benefit indirectly through lower costs to the payors, resulting in lower costs to the healthcare system and meaning less of a burden on taxpayers in the case of CMS and on employers and employees in the case of commercial insurers. As such, the proposed additional fixed MRI scanner would expand the scope of high quality, low cost healthcare services available to the community, and competition would be enhanced in Caldwell County.

A need determination for an additional fixed MRI scanner in Caldwell County would also enable a provider to acquire a new or refurbished fixed MRI scanner offering modern technology and ease of operation, excellent imaging quality, patient comfort, along with high throughput and

dependability, lower capital and operating costs, and energy efficiency capabilities. These would combine to enable a high volume of MRI scans per day, thus containing the cost per procedure.

## **Summary**

Based on the information provided in this petition, EmergeOrtho believes that approval of this petition to add an adjusted need determination for one additional fixed MRI scanner in Caldwell County is in the best interests of Caldwell County residents. The county's elderly population is growing, county residents do not currently have local access to non-hospital-based MR imaging services, and many Caldwell County residents are traveling outside the county to obtain outpatient MRI scans. Also, Caldwell County lacks competition in the MRI marketplace. Costs and charges are much lower in a freestanding, non-hospital-based imaging center than a hospital outpatient department. An additional fixed MRI scanner in Caldwell County will not result in unnecessary duplication, and is supportive of the quality, access and value Basic Principles of the State Medical Facilities Plan.

EmergeOrtho appreciates the thoughtful consideration of the State Health Coordinating Council to this petition, and urges its approval.