

Rodney Skelding's Comments in Opposition to Proposed Policy TE-4 Offered at July 8, 2020 Public Hearing

Good Afternoon. I am Rodney Skelding, Manager of Operations for Alliance Healthcare.

Thank you for the opportunity to share my concerns with Proposed Policy TE-4.

From my role as an Operations Manger for Alliance, I can tell you first-hand that the unintended consequences of Proposed Policy TE-4 are a very real threat to the delivery of quality services to North Carolina citizens.

From my vantage point, those challenges include:

- Scanner operation;
- Coach operation; and
- Logistics operation.

I'll address each of these, briefly.

1- First, as to Scanner Operation:

- a. There are many differences between operating a unit that moves between multiple locations versus operating a fixed scanner.
- b. A Mobile scanner requires multiple configurations to be built into the system, unlike a fixed or parked system. If not correctly configured, incorrect information can be embedded on patients' images.
- c. Operating a Mobile MRI requires specialized staff, trained to face medical emergencies without the same support typically present with an in-house scanner. (What I mean by that is, mobile pads are generally placed on the side or rear of a facility and not as accessible in a reactionary capacity as perhaps a system in a multi-modality facility.)
- d. Networking setup and troubleshooting are key challenges in Mobile operational environment.
 - i. Staff must be trained on common networking issues with a system that moves to different locations because moving components and connections can fail. Staff must manage the configuration changes necessary for maintaining network security.

2- Second, as to Coach Operation:

- a. The patient lift creates increased opportunity for patient or staff injuries. Our Alliance staff receive extensive training in proper safety procedures and "what to do" training in the event of a lift failure.
- b. Small spaces present new challenges.
 - i. Claustrophobia is a major concern in the MRI industry and one that is significantly increased in the Mobile environment which offers limited space on the side of the system as compared to most in-house systems which allow staff to walk around the scanner to provide additional comfort for each patient. Alliance's staff are highly trained and experienced with additional steps in the Mobile environment to combat these challenges.
- c. Essential troubleshooting and proper diagnosis of critical systems on a coach are key challenges in the operation of a Mobile MRI.
 - i. Our teams are specifically trained to troubleshoot Mobile MRI errors which may require resetting HVAC systems, testing or resetting scanner chiller systems, and replacing network cabling or connections in addition to many other potential failures.

3- Finally, as to Logistics:

- a. We have created a strong logistics infrastructure, allowing us the capability to meet strict government regulations. This routinely requires adjusting drivers' schedules to accommodate scanning delays or necessary variations in patient scheduling. I can tell you a provider without experience and expertise in Mobile MRI operations and without a properly trained fleet of drivers is likely to face issues from scan quality to the timely scheduling of exams.

Proposed Policy TE-4 is a serious threat to the appropriate delivery of Mobile MRI services because it could allow numerous hospitals and practices to take on endeavors far outside their business models and without the proper infrastructure in place.

Once the applicant identifies itself as a "qualified applicant" under the Proposed Policy, the CON Section has no Criteria to judge the applicant's ability to safely and effectively offer the service.

Currently, providers apply in competitive reviews only where the numbers show a true need in their service area or they apply in response to a Special Adjusted Need.

Proposed Policy TE-4 is bad planning because it throws open the doors for inexperienced applicants to apply in areas with no need and in reviews guaranteed to be non-competitive.

By potentially allowing an influx of new Mobile MRI Scanners, Proposed Policy TE-4 would erode the ability of ordering physicians and reading radiologists to receive the support they need to provide quality patient services.

Proposed Policy TE-4 should be set aside because it will not foster an environment with the proper imaging support to allow exceptional patient care.

Thank you.