

**PETITION FOR AN ADJUSTMENT TO A NEED DETERMINATION
DUE TO THE IMPACT OF COVID-19**

**Petition to Remove the Fixed MRI Need Determination in the
Pasquotank/Camden/Currituck/Perquimans Service Area in the
*Proposed 2022 State Medical Facilities Plan***

1. PETITIONER

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2. STATEMENT OF THE REQUESTED ADJUSTMENT

Sentara Albemarle Medical Center (SAMC) proposes that the need determination for one fixed MRI scanner in Chapter 17 of the *Proposed 2022 State Medical Facilities Plan (SMFP)* be removed for the Pasquotank/Camden/Currituck/Perquimans service area due to impact of the COVID-19 pandemic.

3. REASON FOR THE REQUESTED ADJUSTMENT

While the standard methodology has generated a need for a second fixed MRI scanner for five years, and though there has been some growth in MRI volume in the service area, SAMC continues to believe that prudent health planning would delay the allocation of another fixed MRI scanner in the service area for another year, particularly as SAMC and the rest of the nation continues to monitor and manage the impacts of the COVID-19 pandemic. In addition to the COVID-19 pandemic's impact on MRI utilization, the reasons to remove the need determination from the *Proposed 2022 SMFP* are similar to those in previous years but remain nonetheless pertinent.¹

For more than a decade, SAMC has been the sole provider of MRI services in the four-county service area with one fixed and one mobile MRI scanner. While the hospital's mobile MRI scanner served two sites in Currituck County in the mid-2000s, the volume at these sites was low and SAMC is currently the only site of MRI service in the service area. As the only MRI provider in the four-county area, SAMC believes that despite the proposed need determination, there is no need for an additional fixed MRI scanner in the service area at this time.

Specifically, the COVID-19 pandemic has created a wide variety of challenges that make it difficult for some healthcare providers to sustain normal levels of operation. In consideration of the

¹ Please see <https://info.ncdhhs.gov/dhsr/mfp/pets/index.html> for previously approved petitions submitted by SAMC to remove need determinations for additional fixed MRI scanners in the *SMFP* for the Pasquotank/Camden/Currituck/Perquimans service area from 2017 to 2020.

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challenges faced during a crisis like COVID-19 and the expected fluctuations in patient volume related to the public health concern, SAMC believes that it currently has the capacity necessary to provide care to the entirety of the service area, including situations that necessitate the utilization of its existing fixed and mobile MRI scanners for COVID-19 related cases. As shown below, in the months prior to the onset of the COVID-19 pandemic, SAMC’s total MRI volume fluctuated around 400 scans per month; however, SAMC’s total MRI volume decreased precipitously from March to April 2020—one month after the beginning of the COVID-19 pandemic. This steep decline coincides with the enactment of public health mandates directing healthcare providers to temporarily suspend elective services/procedures, as well as with stay-at-home ordinances that may have dissuaded individuals from seeking care to limit exposure to the virus.

SAMC Fixed and Mobile MRI Scanner Utilization*

<i>Year</i>	<i>Month</i>	<i>Inpatient MRI Volume</i>	<i>Outpatient MRI Volume</i>	<i>Total MRI Volume</i>	<i>Total MRI Volume Percent Change</i>
2020	January	47	395	442	
	February	57	351	408	-7.7%
	March	46	347	393	-3.7%
	April	47	169	216	-45.0%
	May	57	251	308	42.6%
	June	35	373	408	32.5%
	July	70	373	443	8.6%
	August	67	387	454	2.5%
	September	51	388	439	-3.3%
	October	52	332	384	-12.5%
	November	47	296	343	-10.7%
	December	33	325	358	4.4%
2021	January	66	281	347	-3.1%
	February	72	292	364	4.9%
	March	69	318	387	6.3%
	April	45	329	374	-3.4%
	May	53	342	395	5.6%
	June	65	443	508	28.6%

Source: SAMC internal data. Please see Attachment A.

*Non-weighted scans.

As shown above, beginning in May 2020, total MRI volume began to increase, returning to near pre-pandemic volume by June 2020. However, starting in October 2020, total MRI volume decreased and did not fully recover until June 2021. Nonetheless, through June 2021, total MRI volume never reached pre-pandemic levels. Of note, from mid-September 2020 to mid-April 2021, SAMC’s MRI services were supported by its mobile scanner only as its fixed MRI scanner was replaced. The new technology associated with the replacement fixed MRI scanner allows for

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faster patient throughput and provides patients with enhanced scanning capabilities, which further increases SAMC's ability to support patient demand. SAMC believes that the fluctuations in total MRI volume that have trended downward is indicative of the general public's response to an evolving global pandemic that dictates the manner in which individuals make decisions about their daily lives, particularly when it comes to the need to access an elective healthcare service like an MRI scan. Although the table above shows that MRI volumes hit their zenith in June 2021, SAMC expects total MRI volume to continue to fluctuate downward as new variants of COVID-19 arise such as the delta variant.

Even in the event of a public health crisis such as COVID-19, sufficient MRI capacity exists in the service area to meet the need of the population for some time. SAMC, a not-for-profit hospital with a mission to serve the community, provides care to all in medical need of services, including the medically underserved, without regard to age, race, gender, disability, payor status, or ability to pay. Compared to a second fixed MRI scanner, SAMC's mobile MRI scanner can more effectively provide access at multiple sites across the multi-county service area and beyond. According to the *Proposed 2022 SMFP*, in Federal Fiscal Year 2020, SAMC's mobile scanner performed only 1,287 weighted scans. Further, the removal of the need determination for the service area will enhance value by preventing the potential development of an unneeded second MRI scanner. The existing fixed and mobile MRI scanners in the service area can accommodate any reasonable and anticipated growth in volume, which will increase their utilization, helping to maximize the value of the existing capacity in the service area.

In consideration of these factors, SAMC believes that removing the need determination for one fixed MRI scanner in Chapter 17 of the *Proposed 2022 SMFP* be removed for the Pasquotank/Camden/Currituck/Perquimans service area due to the COVID-19 pandemic

4. ALTERNATIVES CONSIDERED

SAMC considered not filing a petition and potentially applying for the need determination in the *Proposed 2022 SMFP*. However, given the ongoing COVID-19 pandemic, the cost of submitting an application, the cost of developing a second fixed MRI scanner, and the available capacity of SAMC's fixed and mobile MRI scanners to serve the area, SAMC determined that the best alternative was to ask the State Health Coordinating Council to remove the need determination.

5. PLEASE SEE ATTACHMENT A

ATTACHMENT A

Sentara Albermarle Medical Center Fixed and Mobile MRI Scanner Utilization*

<i>Year</i>	<i>Month</i>	<i>Inpatient MRI Volume</i>	<i>Outpatient MRI Volume</i>	<i>Total MRI Volume</i>	<i>Total MRI Volume Percent Change</i>	
2020	January	47	395	442		
	February	57	351	408	-7.7%	
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	June	35	373	408	32.5%	
	July	70	373	443	8.6%	
	August	67	387	454	2.5%	
	September	51	388	439	-3.3%	
	October	52	332	384	-12.5%	
	November	47	296	343	-10.7%	
	December	33	325	358	4.4%	
	Total		609	3,987	4,596	
2021	January	66	281	347	-3.1%	
	February	72	292	364	4.9%	
	March	69	318	387	6.3%	
	April	45	329	374	-3.4%	
	May	53	342	395	5.6%	
	June	65	443	508	28.6%	
	Total		370	2,005	2,375	

Source: Sentara Albermarle Medical Center internal data.

*Non-weighted scans.