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February 6, 2017

Dr. Marc Keshishian
Chair, Certificate of Need Commission
Department of Health & Human Services
South Grand Building, 4th Floor
333 S. Grand Avenue
Lansing, MI 48933

Re: Lithotripsy Standards

Dear Dr. Keshishian:

Sparrow Health System (Sparrow) appreciates the Certificate of Need (CON) Commission taking time to review the Lithotripsy Standards. We would also like to thank the Department for the technical changes outlined in the proposed Standards.

However, we would like to reiterate the request we've had in front of the Commission since October 2015.

In October 2015, Sparrow submitted testimony regarding Lithotripsy Services during the public comment period established by the CON Commission. At that time Sparrow outlined the cost and access issues that have resulted from the current Lithotripsy CON Standards; and requested formation of a Standard Advisory Committee (SAC) to address these concerns.

Sparrow subsequently submitted multiple nominations for a number of qualified individuals to serve on a SAC. However, an insufficient number of consumer groups submitted nominations and the SAC was not formed.

We again provided testimony at the December Commission meeting and our concerns remain unaddressed. Cost continues to be a major concern for Sparrow as we work to maintain excellent patient care and unfettered access to necessary services.

The annual lease fees for Sparrow to rent CON approved equipment is equivalent of purchasing a new fixed unit every year. Having leased equipment for at least the past 10 years, we have essentially paid for ten fixed units. Sparrow and other hospitals will continue to incur these costs unless the



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Lithotripsy standards are made consistent with other mobile modalities where provisions exist to convert from mobile to fixed equipment.

We have prepared language that would set a reasonable threshold for high volume host sites to be able to better serve their patients with around the clock availability. Due to the extremely painful symptoms leading up to a Lithotripsy visit, it is not a service where patients can wait to be treated, nor is it something patients or physicians would undertake voluntarily to inflate numbers and proliferate utilization.

We urge the adoption of a provision to allow conversion from a mobile to a fixed unit.

Thanks for your time and consideration.

Sincerely,

A handwritten signature in black ink that reads 'John A. Shaski'.

John A. Shaski
Government Relations Officer

cc: CON Commission members
CON Policy team

Nagel, Elizabeth (DHHS)

From: Robert Meeker <meekerbob48@gmail.com>
Sent: Thursday, February 09, 2017 12:29 PM
To: MDHHS-ConWebTeam
Subject: Public Comment - UESWL CON Standards

Greater Michigan Lithotripsy (GML) supports the proposed changes to the CON Review Standards for UESWL Services approved for public comment by the CON Commission at their meeting in December 2016.

Alan Buergenthal

Chief Executive Officer

Greater Michigan Lithotripsy

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