

MDHHS Recommendations for CON Standards Scheduled for 2024 Review

Bone Marrow Transplantation (BMT) Services Standards			
Department Recommendations: BMT services should continue to be regulated. The Commission should charge the Department with making necessary technical changes to the review standard.			
Identified Issues	Issue Recommended for Substantive Review?	Recommended Course of Action to Review Issues	Other/Comments
Update with county designations.	No.	The Department will draft for Commission review.	This issue was identified by the Department. This is a technical edit being recommended for all relevant review standards.
“The applicant shall provide notice to the Department of any planned decrease or discontinuation of service(s) no later than 30 days after the planned decrease or discontinuation of the service(s).”	No.	The Department will draft for Commission review.	This issue was identified by the Department. This is a technical edit being recommended for all review standards.
Other technical edits by the Department if needed.			

Pursuant to MCL 333.22215 (1) (m), the Certificate of Need (CON) Commission is to “...review, and if necessary, revise each set of CON standards at least every 3 years.” In accordance with the established review schedule on the Commission Work Plan, the BMT Services Standards are scheduled for review in the calendar year 2024.

Public Comment Period Testimony

The Department held a Public Comment Period to receive testimony regarding the Standards on October 6 - 20, 2023. Testimony was received from four (4) organizations and is summarized as follows:

1. *Darryl Elmouchi, Corewell Health East*
 - Supports continued regulations and recommends no changes at this time.
2. *Denise Brooks-Williams and Muneer Abidi, Henry Ford Health*
 - Supports continued regulations and recommends no changes at this time.
3. *Shannon D. Striebich, Trinity Health Michigan Market*
 - Supports continued regulations and recommends no changes at this time.

4. *T. Anthony Denton, University of Michigan Health Michigan Medicine*
 - Supports continued regulations and recommends no changes at this time.

Background:

The BMT standards were reviewed with a Standard Advisory Committee (SAC) in 2018/19. The current effective date of the [BMT standards](#) is September 29, 2014.

BMT Survey Data for 2022:

Annual survey data for 2022 is the latest available and can be found here: [Organ Transplant Utilization - 2022](#)

MDHHS Recommendations for CON Standards Scheduled for 2024 Review

Heart/Lung and Liver Transplantation (HLL) Services Standards			
Department Recommendations: HLL services should continue to be regulated. The Commission should form a Standard Advisory Committee to make a recommendation regarding the following identified issues.			
Identified Issues	Issue Recommended for Substantive Review?	Recommended Course of Action to Review Issues	Other/Comments
Review modifications to improve access to Liver Transplantation services.	Yes.	Standard Advisory Committee	Recommended by U of M Health and Trinity Health
Update with county designations.	No.	The Department will draft for Commission review.	This issue was identified by the Department. This is a technical edit being recommended for all relevant review standards.
The applicant shall provide notice to the Department of any planned decrease or discontinuation of service(s) no later than 30 days after the planned decrease or discontinuation of the service(s).	No.	The Department will draft for Commission review.	This issue was identified by the Department. This is a technical edit being recommended for all review standards.
Other technical edits by the Department if needed.			

Pursuant to MCL 333.22215 (1) (m), the Certificate of Need (CON) Commission is to “...review, and if necessary, revise each set of CON standards at least every 3 years.” In accordance with the established review schedule on the Commission Work Plan, the HLL Services Standards are scheduled for review in the calendar year 2024.

Public Comment Period Testimony

The Department held a Public Comment Period to receive testimony regarding the Standards on October 6 - 20, 2023. Testimony was received from five (5) organizations and is summarized as follows:

1. *Douglas Apple, Ascension Michigan*
 - Supports continued regulations and recommends no changes at this time.

2. *Darryl Elmouchi, Corewell Health*
 - Supports continued regulations and recommends no changes at this time.
3. *Marwan S. Abouljoud, Henry Ford Health*
 - Supports continued regulations and recommends no changes at this time.
4. *Shannon D. Striebich, Trinity Health Michigan Market*
 - Supports continued regulation. Review the initiation and comparative review requirements to increase Liver transplant services.
 - Also provided comment from St. Joseph Mercy's 2021 comment:
 1. *Rob Casalou, Saint Joseph Mercy and Mercy Health System*
 - i. Review the initiation and comparative review requirements for Liver Transplantation.
5. *T. Anthony Denton & Christopher J. Sonnenday, U of M Health Michigan Medicine*
 - *Evaluation of population density, socioeconomic, and other key factors to increase Liver transplant services.*

Background:

The HLL standards were reviewed by a Standard Advisory Committee (SAC) in 2009. The current effective date of the HLL standards is September 28, 2012.

HLL Survey Data for 2022:

Annual survey data for 2022 is the latest available and can be found here:

[Organ Transplant Utilization - 2022](#)

MDHHS Recommendations for CON Standards Scheduled for 2024 Review

Magnetic Resonance Imaging (MRI) Services Standards

Department Recommendations: MRI services should continue to be regulated. The Commission should form an Informal Workgroup to make a recommendation regarding the following identified issues.

Identified Issues	Issue Recommended for Substantive Review?	Recommended Course of Action to Review Issues	Other/Comments
Revise Section 16 to include adjustments for patients with implants or other metallic foreign bodies.	No.		The recommendation was from Corewell Health. The Department has not received enough evidence to support the need for change.
Revise standards to integrate MRI volume count for PET/MRI utilization.	No.		The recommendation was from U of M Health. The Department is opposed due to wider policy implications of allowing procedures from one review standard to count towards volume requirements in a different standard. The PET/MRI scanner is not counted as an MRI unit for volume purposes, therefore, the MRI scans performed in the PET/MRI scanner should not count towards MRI volume.
Requests revisions to standards to include outpatient MRI-Guided procedures without General Anesthesia	No.		The recommendation was from U of M Health. The Department believes existing adjusted weighting is sufficient with an existing definition for MRI-guided interventions – "...means any invasive procedure performed requiring MRI guidance performed in the MRI scanner."

Requests revising rules to assign a heavier weight to MRI-guided procedures.	No.		The recommendation was from U of M Health. The Department believes existing adjusted weighting is sufficient with an existing definition for MRI-guided interventions – "...means any invasive procedure performed requiring MRI guidance performed in the MRI scanner."
Revise section 2 (jj) definition of "Mobile MRI unit" to operate at minimum once per quarter.	Yes.	The Department will draft language for the informal workgroup/ Commission to review.	The recommendation was from the Department. This is to clarify existing terms within the review standards in terms of requirements of regularly scheduled basis.
Revise section 4(4)(b) to add MRI mobile host site has been in operation for at least 12 months.	Yes.	The Department will draft language for the informal workgroup/ Commission to review.	The recommendation was from the Department. This is to clarify existing terms within the review standards for subsequent relocations of the same host site.
Add project delivery requirements to section 15 to include mobile host site patient safety similar to CT CON Standards.	Yes.	Informal Workgroup	The recommendation was from the Department.
Clarify what "immediately available" means in section 15(2)(e)	Yes.	Informal Workgroup	The recommendation was from the Department.
Revise section 2(1)(vv) to clarify "Teaching facility" and who can be allowed to get the additional teaching factor.	Yes.	Informal Workgroup	The recommendation was from the Department.
Rereview provisions requiring CON approval to renew a lease for existing equipment.	No.	The Department will draft for Commission review.	The recommendation was from MyMichigan Health. The Department believes the lease renewal requirements are clear.

Improve access to MRI in rural and micropolitan statistical area counties.	Yes.	Informal Workgroup	The recommendation was from MyMichigan Health. The Department supports expanding access in rural areas
Update with county designations.	No.	The Department will draft for Commission review.	This issue was identified by the Department. This is a technical edit being recommended for all relevant review standards.
“The applicant shall provide notice to the Department of any planned decrease or discontinuation of service(s) no later than 30 days after the planned decrease or discontinuation of the service(s).”	No.	The Department will draft for Commission review.	This issue was identified by the Department. This is a technical edit being recommended for all review standards.
Other technical edits by the Department if needed.			

Pursuant to MCL 333.22215 (1) (m), the Certificate of Need (CON) Commission is to “...review, and if necessary, revise each set of CON standards at least every 3 years.” In accordance with the established review schedule on the Commission Work Plan, the MRI Services Standards are scheduled for review in the calendar year 2024.

Public Comment Period Testimony

The Department held a Public Comment Period to receive testimony regarding the Standards on October 6 - 20, 2023. Testimony was received from six (6) organizations and is summarized as follows:

1. *John C Shull, Corewell Health*
 - Supports continued regulations. Requests the standards be revised to include adjustments for patients with implants or other metallic foreign bodies.
2. *Douglas J. Apple, Ascension Michigan*
 - Supports continued regulations and recommends no changes at this time.
3. *Denise Brooks-Williams, Henry Ford Health*
 - Supports continued regulations and recommends no changes at this time.
4. *Shannon D. Striebich, Trinity Health Michigan Market*
 - Supports continued regulations and recommends no changes at this time.

5. *T. Anthony Denton and Vikas Gulani, University of Michigan Health Michigan Medicine*
 - Supports continued regulations. Requests revisions to standards to include outpatient MRI-Guided procedures without General Anesthesia.
 - Requests revising rules to assign a heavier weight to MRI-guided procedures.
 - Requests integration of MRI volume count for PET/MRI utilization.

6. *Sunita B. Vadakath, MyMichigan Health (Comment came in 10/27/23)*
 - Rereview provisions requiring CON approval to renew a lease for existing equipment.
 - Improve access to MRI in rural and micropolitan statistical area counties.

Background:

The MRI standards were reviewed with an Informal Workgroup in 2021/22. The current effective date of the MRI standards is January 26, 2023.

MRI Survey Data for 2022:

Annual survey data for 2022 is the latest available and can be found here:

[MRI Service Utilization Lists \(michigan.gov\)](https://www.michigan.gov/mri)

MDHHS Recommendations for CON Standards Scheduled for 2024 Review

Psychiatric Beds and Services Standards			
Department Recommendations: Psychiatric Beds and Services should continue to be regulated. The Commission should form an Informal Workgroup to make a recommendation regarding the following identified issues.			
Identified Issues	Issue Recommended for Substantive Review?	Recommended Course of Action to Review Issues	Other/Comments
Review reduction of maintenance volume for special population pool beds from 80% to 60%.	Yes.		Recommendation was included in previous workgroup report to Commission. Recommendation also comes from Corewell Health.
Review redistribution of excess beds to other categories to aid in improving access to needed inpatient psychiatric services.	No.		This recommendation was from Lake Huron Medical Center. The Department believes redistribution is not feasible due to special population bed pools being a percentage of total special pool beds.
Refine the definition of “Flex bed” to include the conversion of an existing child/adolescent psychiatric bed to an adult psychiatric bed in an existing adult psychiatric service.	No.		This recommendation was from Universal Health Services. The Department believes it would go against the original intent behind the definition.
Revise section 2(t) definition to remove the outdated terminology.	Yes.		This recommendation was from the Department.
Other technical edits by the Department if needed.			

Pursuant to MCL 333.22215 (1) (m), the Certificate of Need (CON) Commission is to “...review, and if necessary, revise each set of CON standards at least every 3 years.” In accordance with the established review schedule on the Commission Work Plan, the Psychiatric Beds and Services Standards are scheduled for review in the calendar year 2024.

Public Comment Period Testimony

The Department held a Public Comment Period to receive testimony regarding the Standards on October 6 - 20, 2023. Testimony was received from six (6) organizations and is summarized as follows:

1. *Douglas J. Apple, Ascension*
 - Supports continued regulations and recommends no changes at this time.
2. *Subodh Jain, Corewell Health*
 - Supports continued regulations. Requests reduction of maintenance volume for special population pool beds from 80% to 60%.
3. *Denise Brooks-Williams, Henry Ford Health*
 - Supports continued regulations and recommends no changes at this time.
4. *Jose Kottoor, Lake Huron Medical Center*
 - Supports continued regulations. Requests to have excess beds redistributed to other categories to aid in improving access to needed inpatient psychiatric services.
5. *Jenifer Nyhuis, Universal Health Services*
 - Supports continued regulations. Requests the definition of “Flex bed” to be revised to include the conversion of an existing child/adolescent psychiatric bed to an adult psychiatric bed in an existing adult psychiatric service.
6. *T. Anthony Denton and Gregory W Dalack, University of Michigan Health Michigan Medicine*
 - Supports continued regulations and recommends no changes at this time. Believes it is too early to evaluate with recent changes still being processed.

Background:

The Psychiatric Beds and Services standards were reviewed with Informal Workgroups in 2022 and 2023. The current effective date of the Psychiatric Beds and Services standards is pending after receiving Final Action from the CON Commission at the December 2023 meeting.

Psychiatric Beds and Services Survey Data for 2022:

Annual survey data for 2022 is the latest available and can be found here:

[Psychiatric Services – 2022](#)

[Pediatric Psychiatric Services – 2022](#)

[Psychiatric Services Acute Care – 2022](#)

[Flex Bed Unit Adult/Peds – 2022](#)

[Adult Special Pool Beds – 2022](#)

[Child/Adolescent Special Pool Beds - 2022](#)