



Ascension

July 28, 2022

Chairperson Amy L. McKenzie, MD
Certificate of Need Commission
c/o Michigan Department of Health and Human Services
Certificate of Need Policy Section
South Grand Building, 4th Floor
333 S. Grand Ave
Lansing, Michigan 48933

Via E-Mail: MDHHS-ConWebTeam@michigan.gov

Dear Chairperson McKenzie,

On behalf of Ascension Michigan please accept this correspondence as written testimony regarding Ascension Michigan's recommendations on CON Review Standards for Magnetic Resonance Imaging (MRI) and Megavoltage Radiation Therapy (MRT).

Magnetic Resonance Imaging (MRI)

Ascension Michigan supports the continued regulation of Magnetic Resonance Imaging (MRI) services and commends the work completed on these standards by the MRI workgroup in the past year. We have no further recommended changes for CON MRI standards at this time.

Megavoltage Radiation Therapy (MRT)

Ascension Michigan supports the continued regulation of Megavoltage Radiation Therapy (MRT) and commends the work completed on these standards by the Megavoltage Radiation Therapy workgroup in this year. We are appreciative that the CON Commission took our 2019 comments into consideration which urged the review of the reduction of equivalent treatment visit (ETV) requirements. We have no further recommended changes for MRT standards at this time.

Thank you for the opportunity to provide written comments on the CON Review Standards for Magnetic Resonance Imaging (MRI) and Megavoltage Radiation Therapy (MRT). We look forward to working with the Commission this, and the coming year.

Sincerely,

Joseph Cacchione, EVP, Clinical & Network Services, Ascension, and
Interim, Michigan Market Leader

July 29, 2022

Dr. Amy McKenzie
CON Commission Chairperson
South Grand Building, 4th Floor
333 S. Grand Avenue
Lansing MI 48933

Dear Commissioner McKenzie,

Henry Ford Health System (HFHS) would like to offer comments on Certificate of Need review standards for Magnetic Resonance Imaging (MRI) Services:

HF Health appreciates the work completed by the Workgroup in 2022, and the diligent focus on data to guide decision making. The workgroup had several charges to address. The recommendations made by the workgroup demonstrate a focus on improving access to MRI technologies for patients and communities throughout the state of Michigan, while balancing cost and ensuring high-quality care delivery.

HFHS supports the CON Commission's vote to move forward the Workgroup's proposed changes to the standards and urge the Commission to give final approval at the September meeting.

Respectfully,

Denise Brooks-Williams

Denise Brooks-Williams
Senior Vice President and
Chief Executive Officer
Henry Ford Health
One Ford Place – 5A
Detroit, MI 48202

Manuel S. Brown, MD

Manuel Brown, MD
Chair, System Radiology Services
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July 29, 2022



Dr. Amy McKenzie
CON Commission Chairperson
South Grand Building, 4th Floor
333 S. Grand Avenue
Lansing MI 48933

Dear Commissioner McKenzie,

Henry Ford Health (HFH) would like to offer comments on Certificate of Need review standards for Megavoltage Radiation Therapy (MRT) Services:

HFH appreciates the work completed by the Workgroup in 2022. HFH supports both the revised language for replacing an existing MRT service to a new site in a rural or micropolitan statistical area county and the addition of language calling out additive factors for CT Guided Real Time Tracking Radiation with and without adaptive. HFH supports the CON Commission's vote to move forward the Workgroup's proposed changes to the standards and urge the Commission to give final approval at the September meeting.

Respectfully,

A handwritten signature in black ink that reads "Ben Movsas".

Benjamin Movsas, MD, FASTRO, FACR, FARS
Chair, Department of Radiation Oncology
Medical Director, Henry Ford Cancer
Herndon Endowed Chair in Oncology Research
Henry Ford Health
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July 27, 2022

Amy L. McKenzie, MD

Chair, CON Commission

Department of Health and Human Services - Certificate of Need Policy Section

5th Floor South Grand Building

333 S. Grand Ave.

Lansing, MI 48933

RE: Public Comment for Megavoltage Radiation Therapy Certificate of Need Standards

Dear Chairman McKenzie:

Trinity Health Michigan would like to thank the Certificate of Need Commission for the opportunity to comment on the proposed changes to the Megavoltage Radiation Therapy (MRT) Certificate of Need Standards. We would also like to express our gratitude to Dr. Salim Siddiqui, the MRT workgroup chairperson, for meeting with members of our team to clarify the informal working group's recommendations. Our specific questions about the proposed changes to the MRT language were answered and Trinity Health supports the MRT language as written and reviewed at the June 2022 CON Commission meeting.

We continue to be concerned that the weights and additive values for MRT treatments within the CON standards require a holistic review to the many types of technologies (not just MRT-MRI and now MRT-CT) that contribute to the time needed for MRT treatment. The additive weight for MRT-CT was just a small portion of the comprehensive standard update that is truly needed. It is our understanding from Dr. Siddiqui that the informal workgroup identified that new time studies and surveys are needed to update how Michigan providers are using MRT technology more broadly. To this end, Trinity Health anticipates it will submit public comment in October recommending a SAC to review weights, additive values, and definitions during the normal review cycle for MRT CON Standards for 2023. As always, Trinity Health would be happy to support a SAC should the Commission determine one is needed.

Finally, while we understand that there will be instances in which an additional charge might need to be added to an Informal Workgroup's initial list of approved charges, we would encourage the Commission to minimize this in the future. Because workgroups are an informal mechanism with unpredictable participation from meeting to meeting, we believe there is less assurance of having appropriate experts involved when a new charge is added and discussed.

We appreciate the CON Commission's consideration of our comments.

Sincerely,

A handwritten signature in black ink that reads "Rob Casalou".

Rob Casalou

President and CEO

Trinity Health Michigan & SE Regions