



Ascension

August 4, 2020

Chairman James Falahee
Certificate of Need Commission
c/o Michigan Department of Community Health
Certificate of Need Policy Section
South Grand Building
333 S. Grand Avenue
Lansing, MI 48933

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

Dear Chairman Falahee and CON Commission Members,

This letter is written as formal testimony pertaining to the CON Review Standards for Computed Tomography (CT) Scanner Services.

Ascension Michigan supports the continued regulation of CT services and commends the work completed by the CON CT Workgroup on these standards in the past year. We support the draft language and recommendations from the workgroup. We have no further recommended changes for CON CT standards at this time.

Sincerely,

Alisha Cottrell

Vice President, Advocacy
Ascension Michigan



Henry Ford Health System
One Ford Place – Suite 4A
Detroit, MI 48202

July 19, 2020

Mr. James Falahee, JD
CON Commission Chairperson
South Grand Building, 4th Floor
333 S. Grand Avenue
Lansing MI 48933

Dear Commissioner Falahee,

Henry Ford Health System (HFHS) would like to offer comments on Certificate of Need review standards for Computed Tomography (CT) Scanner Services:

HFHS appreciates the work the Standard Advisory Committee did in 2019. Additionally, we believe the recommended changes in the CT Standards are an appropriate reflection of CT Scanner Service delivery, and continues to support the goals of ensuring cost, quality and access are aligned to most effectively meet the needs of the communities we serve. HFHS supports the CON Commission's vote of approval of the recommended changes in June 2020 and support a final vote of approval by the CON Commission in September.

Respectfully,

A handwritten signature in black ink, appearing to read "Barbara Bressack".

Barbara Bressack
Henry Ford Health System
Vice President, Strategy and Planning
One Ford Place, 4A
Detroit, MI 48202

July 30, 2020

Chairperson James Falahee
Certificate of Need Commission
c/o Michigan Department of Health and Human Services
Certificate of Need Policy Section
South Grand Building, 5th Floor
333 S. Grand Ave
Lansing, Michigan 48933

Dear Chairperson Falahee,

Spectrum Health thanks the CON Commission for the opportunity to provide written testimony on the CON Review Standards for Computed Tomography (CT) Scanner Services.

Spectrum Health supports the draft changes to the CT review standards. The CT workgroup was very deliberate in its recommendations. Members of the workgroup spent countless hours reviewing data, surveying clinical experts, and scrutinizing the current review standard language. In the end, the workgroup determined that the current minimum volumes equated to almost maximum operational time, which is unrealistic with the current clinical environment.

With this determination, the workgroup developed minimum volumes that more accurately reflect the demand of clinical use. Further, the workgroup added language to account for geographically significant services and to add consistency within the standards.

The workgroup considered cost, quality, and access in making these recommendations. Although some concern was raised most recently about the cost of services being provided in more rural areas of the State, the workgroup felt access to critical diagnostic services in rural areas outweighed the additional costs associated with providing these services at a reasonable distance to our rural citizens. In addition, the recommendations do not modify the requirements for initiation of new services, therefore the only costs associated with the changes themselves will be cost savings by ensuring CT services that are filling a critical geographic access need will not have their costs increased through compliance fines issued for low volume.

Finally, although there is no evidence to suggest utilization in rural areas has historically been driven by CON minimum volumes, by reducing minimum volumes for these geographically significant CT services, we further reduce the risk of overutilization which also has the potential to reduce costs.

Again, thank you for the opportunity to provide feedback on the CON Review Standards for Computed Tomography (CT) Scanner Services. Spectrum Health appreciates the Commission's consideration of our comments.

Sincerely,



Ron Lewis
SHZCH President | SW Regional Market Leader | SHWM Radiology VP