



30 Main Street, Suite 500 | P.O. Box 1489 | Burlington, VT 05402-1489

September 10, 2021

DELIVERED ELECTRONICALLY

Donna Jerry
Senior Health Policy Analyst
Green Mountain Care Board
144 State Street
Montpelier, VT 05602

**Re: Letter of Intent
Rutland Regional Medical Center Temporary Use of Mobile MRI**

Dear Ms. Jerry:

This firm is writing on behalf of Rutland Regional Medical Center (“RRMC”) to notify the Green Mountain Care Board (the “Board”) of RRMC’s intent to temporarily use a mobile magnetic resonance imaging (“MRI”) machine (“Mobile Unit”) and seek a determination from the Board of no jurisdiction over the same. Subject to the Board’s determination on the jurisdictional request, RRMC wishes to contract for the use of the Mobile Unit for a period of twelve months – with the ability to extend that period month-by-month for up to an additional twelve-month period. The Mobile Unit is a 1.5 tesla, GE HDxt 23x Mobile MRI, which is the same strength as the existing MRI unit that RRMC currently operates.

RRMC submits that the proposed use of the Mobile Unit does not trigger the Board’s jurisdiction, as the operational expenses over the two year period during which RRMC may use the Mobile Unit is not expected to exceed, or even come close to, \$1,000,000.00 in either year. See 18 V.S.A. § 9434(b)(3) (“The offering of a health care service or technology having an annual operating expense that exceeds \$1,000,000.00 for either of the next two budgeted fiscal years, . . .”).

RRMC, as with other hospitals in Vermont, is experiencing a surge in the need for services, including MRI scans. The increased need for such services is exacerbated when RRMC’s existing MRI unit experiences unanticipated periods of inoperability or planned downtime for necessary repairs and maintenance.

RRMC is experiencing increased downtime with the existing, twenty year old machine. When the existing MRI is inoperable due to the need for an unanticipated repair, the period of inoperability may last days, rather than hours. This extended period is frequently the result of the increased difficulty in sourcing and acquiring the necessary parts for repairs. Often, the manufacturer is finding the necessary parts outside the United States. This results in an extended period for delivery of the part to RRMC.

For a twelve-month period, June 2020 through June 2021, the total downtime for the existing MRI unit was 126 hours. Submitted with this letter, as Attachment A, is a service report with the downtime

summary. This shows an average downtime of 10.5 hours, with a high of 69 hours on June 18, 2021, which was preceded by a 27-hour period in April 2021.

Most recently, and not included in Attachment A, the existing MRI was inoperable as follows:

- 8/06/21 9:00 p.m. to 8/07/21 1:00 a.m. – unexpected. It took RRMC days to recover because days later they could still only perform certain scans;
- 8/25/21 – planned, 7 hours of downtime for repairs, starting at 1:30 p.m.; and
- 09/01/21 – planned, 6 hours of downtime for repairs, at 1:30 p.m.

The consequences of these unanticipated and unscheduled downtimes include, but are not limited to:

- loss of confidence among patients, when their scans have to be rescheduled;
- repercussions to clinical service lines (for example, FCC, Ortho, Neuro) when delays in care result from rescheduling to a later date;
- lengthened stays in some cases where inpatient scans are required; and
- the transfer of some ED patients to other facilities when an MRI is required but delayed.

As mentioned above, even without the occasional inoperability of the existing MRI, RRMC is currently experiencing an increased need for MRI scans that is attributed to the backlog in health care services caused by the pandemic. Not only is there an increase in patients seeking delayed treatment from their primary care providers, which is resulting in sicker patients and increased MRI orders, but also RRMC's Emergency Department ("ED") is experiencing a similar increase in volume. An increase in ED patients places further demands on the already-taxed MRI schedule. RRMC, while operating the existing MRI seven days a week, at ten to twelve hours a day, is unable to keep up with the current demand, which RRMC expects will eventually subside; though it is difficult to estimate, given the uncertainties of COVID-19's future impact on health care services in Vermont.

Being able to operate the Mobile MRI and the existing MRI simultaneously is anticipated to have the following benefits for RRMC and the community it serves:

- Restoring access to services, so that outpatient MRIs are scheduled and completed within 3-5 days of the request, as opposed to the current delays, which have increased in September 2021 to up to two to three weeks (with a handful of appointments held open for more urgent cases); and
- Providing for a back-up when the existing MRI has periods of inoperability.

The Mobile MRI would be put to use from the time of delivery (following set-up and training) through the period of increased need and any extended periods of downtime for the existing MRI. RRMC would enter into a 12-month service contract for the use of the Mobile MRI, with a month-to-month contingency to follow, should the need continue beyond twelve months.

In support of this request, please see the spreadsheet submitted herewith as Attachment B. The training costs and Mobile MRI maintenance costs are rolled into the monthly contractual fee for the use of the Mobile MRI. The monthly operating expense associated with the service contract is \$29,500.00. (See line item, Monthly Fee, Training, Maintenance, & Mileage – GE HDX 23X Mobile MRI – Alliance Radiology.)

Donna Jerry
September 10, 2021
Page 3

The references in the spreadsheet to Technologist and Aide Salaries, Payroll Tax, and Fringe Benefits pertain to part-time and per diem staff members whom RRMC would be staffing to meet the additional Monday through Friday, 40 hours per week, needs for the Mobile MRI, while operating simultaneously with the existing MRI. When the Mobile Unit is operating alone, without the simultaneous operation of the existing MRI unit, the staffing and supply costs disappear. One can see that even without those staffing and supply costs going away, the operating expenses over the course of a year, \$551,832, are well below the jurisdictional threshold of \$1,000,000.

Correspondingly, the spreadsheet overstates the Total Patient Service Revenue from the Mobile Unit, in excess of \$3,640,000 over the course of six months, as that is the total amount that would be billed if RRMC operated the Mobile MRI as a second unit at all times. RRMC is fairly certain that will not be the case because there will be periods, based on past experience and recent history, when the existing MRI will be inoperable, so that there will not be two MRI machines generating revenue.

Based on the foregoing, RRMC respectfully seeks the Board's determination that its intent to secure a temporary mobile MRI unit does not fall within the Board's jurisdiction.

Thank you and the Board for your time and consideration.

Respectfully submitted,

/s/ Shireen T. Hart

Shireen T. Hart

Enclosures

Service Report Downtime Summary for GE 1.5T HDXT MRI Scanner at RRMC SID 802747MR

For the last 12 months the Total downtime was 126 hours

Avg downtime per month was 10.5 hours

At the bottom of this report is the Equipment service History.

Each event for this system generated an SR. Attached to each SR is an activity for each Engineer who supported the repair. Some repairs were done while the MRI system was scanning either onsite or remotely so no system down time was incurred.

The system downtimes compiled were the hours that the MRI was not available to scan due to maintenance and or repair.

Service Reports for SID 802747MR

CR

25 Jun 2021 System Downtime for this event: 1.0

Status: Open Owner: Harold Flad

Problem:

8Ch NeuroVascular coil "Invivo" GE Part # 2317115-2
 Assembly # 103045 shows low signal on one or more
 channels. Passes MCQA

CR

21 Jun 2021 System Downtime for this event: 2.0

Status: Closed Owner: Charles Nutt

Problem:

We iLinqed today about pre scan failure, they said it might
 be the A port, just tried Abdomen scan and got the same pre
 scan failure. Brain coil is working fine, it seems anything
 with A port gets the pre scan failure. Image:NONE-NONE-
 NONE

CR

21 Jun 2021 System Downtime for this event: 3.0

Status: Closed Owner: Harold Flad

Problem:

Driver Module fault Image:NONE-NONE-NONE

ATTACHMENT A

CR 18 Jun 2021	System Downtime for this event: 69.0	Status: Pending Approval	Owner: Robert Ochal	Problem: Getting error, PDCU is in stop mode, Emergency stop button was pressed or PDU 24 volt supply has failed. We did not hit the emergency stop. Image:NONE-NONE-NONE
PM 17 Jun 2021	System Downtime for this event: 0.0	Status: Open	Owner: Harold Flad	Problem: PM Jul 2021
CR 15 Jun 2021	System Downtime for this event: 0.0	Status: Open	Owner: Harold Flad	Problem: Analogic RF Amplifier Peak Power Fault in error log CD 06/16/2021 08:00:00 (GMT-05:00) Eastern Time (US & Canada) Customer has delayed service, please refer to the Planned Date to get this information and page the FE when needed. / Customer Symptom: Axial t2 and PD sequences on Lumbar scans giving RF failure error. Tried TPS reset, did not fix issue. Weekend techs said the same error happened on lumbar scan this last weekend. Unable to run both axial t2 and PD, all sag sequences ran without issue. Image:Lumbar wo-1446,1447-NONE <S>
CR 14 Jun 2021	System Downtime for this event: 0.0	Status: Closed	Owner: David Baxter	Problem: NVA image quality complaint
CR 14 Jun 2021	System Downtime for this event: 0.0	Status: Closed	Owner: Harold Flad	Problem: low signal on one channel on Invivo 8 Ch brain coil
CR 07 Jun 2021	System Downtime for this event: 1.0	Status: Closed	Owner: Harold Flad	Problem: Knee coil will not pass MCQA
CR 03 Jun 2021	System Downtime for this event: 0.0	Status: Closed	Owner: David Baxter	Problem: ongoing white pixels
CR 02 Jun 2021	System Downtime for this event: 6.5			

ATTACHMENT A

Status: Closed Owner: Douglas Cyr Problem: EPIWP analysis for FE.

CR System Downtime for this event: 1.0
18 May 2021

Status: Closed Owner: Alejandro Jasso Problem: Customer states that the unit is down.

CR System Downtime for this event: 27.0
25 Apr 2021

Status: Pending Approval Owner: Douglas Cyr Problem: Customer states that the computed on the machine crashed and won't reboot.

CR System Downtime for this event: 2.0
19 Mar 2021

Status: Assigned Owner: Harold Flad Problem: White Pixel noise causing Intermittent corduroy artifact on some coils

PM System Downtime for this event: 0.0
16 Mar 2021

Status: Cancelled Owner: Harold Flad Problem: PM Apr 2021. Exempted - Revised PM DUE Date Jun 2021.

CR System Downtime for this event: 0.0
02 Mar 2021

Status: Closed Owner: Alejandro Jasso Problem: Customer needs service reports.

CR System Downtime for this event: 1.5
27 Feb 2021

Status: Closed Owner: Robert Ochal Problem: CD 3/1/2021 08:00 AM COULD YOU PLEASE NOTIFY OUR FE THAT WE ARE HAVING TROUBLE WITH THE NUMBER 3 COIL IN OUR 16CH NEURO ARRAY COIL. PLEASE HAVE HIM GIVE US A CALL ON MONDAY. THANKS Image:NONE-NONE-NONE

CR System Downtime for this event: 1.5
26 Jan 2021

ATTACHMENT A

Status: Closed Owner: Harold Flad Problem: artifact on DWI, cube and fiesta sequences. Noticed a few days ago, continuing today. Image:NONE-NONE-NONE

CR System Downtime for this event: 1.0
25 Dec 2020

Status: Closed Owner: Kyle Tempesta Problem: Breaker to PDU tripped. System reset but TPS system not responding after multiple resets. Image:NONE-NONE-NONE

CR System Downtime for this event: 0.0
22 Dec 2020

Status: Closed Owner: Gary Henning Problem: I SEE THAT SOMEONE IS IN MY SYSTEM. COULD THEY PLEASE LOOK TO SEE WHY IM GETTING MULTI BIAS-FAULT ERRORS. Image:NONE-NONE-NONE

PM System Downtime for this event: 3.0
16 Dec 2020

Status: Closed Owner: Harold Flad Problem: PM Jan 2021

CR System Downtime for this event: 0.0
13 Dec 2020

Status: Closed Owner: Avery Thomas Problem: Equipment room overheated. Maintenance working on AC. Chiller off most of the night. back on around 0930 this morning. Able to scan for short while but now getting Gradient problem messages. Please call 802-747-1707. Image:NONE-NONE-NONE

CR System Downtime for this event: 0.0
13 Dec 2020

Status: Closed Owner: Charles Nutt Problem: MRM80002. P1 - Compressor Off (Magnet)

ATTACHMENT A

CR System Downtime for this event: 0.0
07 Dec 2020

Status: Open Owner: Harold Flad

Problem:

Default Password Update – Insite One – During your next service or PM, please change the passwords identified in the Service Note for this modality. The new password will be the “Row-ID” identifier for this system ID and can be found in Service Request screen (Not the Activity Screen) under the heading System Info in FX. In your debrief “Action” comments, confirm “Password changed to “XXXXXXX” to document the actual password used. Consult your service documentation or contact Technical Support if you have questions. Reminder: passwords are case sensitive, and mistakes will likely require reset via LFC!

CR System Downtime for this event: 0.0
16 Nov 2020

Status: Closed Owner: William Nichol

Problem:

MRM80002. P1 - Compressor Off (Magnet)

CR System Downtime for this event: 0.5
08 Nov 2020

Status: Closed Owner: Gary Henning

Problem:

We are starting to see gradient amplifier not ready messages when trying to do Axial T2 FSE sequences. Has happened a couple of times this week. Most recently about 5 mins ago. Image:NONE-NONE-NONE

PM System Downtime for this event: 1.0
16 Sep 2020

Status: Closed Owner: Harold Flad

Problem:

PM Oct 2020

CR System Downtime for this event: 1.0
31 Aug 2020

Status: Closed Owner: Harold Flad

Problem:

12 channel anterior coil cabling has a crack in the cover.

CR System Downtime for this event: 1.0
25 Jun 2020

ATTACHMENT A

Status: Closed Owner: Harold Flad

Problem: There is a problem with the alignment on the table. It is rubbing as it comes out and causing a horrible grinding noise. Could you please let my FE know he needs to come and adjust it. Image:NONE-NONE-NONE

PM System Downtime for this event: 3.0
16 Jun 2020

Status: Closed Owner: Harold Flad

Problem: PM Jul 2020

Rutland Regional Medical Center
Statement of Revenue and Expenses
MRI Mobile Truck - 40 Additional Tests per Week
9/8/2021

	<u>Per Month</u>	<u>Total for Six Months</u>
OPERATING REVENUE		
Inpatient Revenue	\$ -	\$ -
Outpatient Revenue	\$ 606,688	\$ 3,640,130
TOTAL PATIENT SERVICE REVENUE	\$ 606,688	\$ 3,640,130
Less Deductions for Contractual Allowances	\$ (343,124)	\$ (2,058,743)
NET PATIENT SERVICE REVENUE	\$ 263,564	\$ 1,581,387
Other Operating Revenue	\$ -	\$ -
TOTAL OPERATING REVENUE	\$ 263,564	\$ 1,581,387
OPERATING EXPENSES		
Technologist and Aide Salaries	\$ 9,559	\$ 57,354
Technologist and Aide Payroll Tax	\$ 754	\$ 4,524
Technologist and Aide Fringe Benefits	\$ 1,838	\$ 11,029
Medical Supplies (PPE, Contrast, Hazardous Waste Disposal)	\$ 2,305	\$ 13,832
Non-Medical Supplies (Office Products)	\$ 30	\$ 178
Utilities (Electric*)	\$ 2,000	\$ 12,000
Monthly Fee, Training, Maintenance, & Mileage - GE HDX 23X Mobile MRI - Alliance Radiology**	\$ 29,500	\$ 177,000
Mobile MRI Mileage Fee†	\$ -	\$ -
TOTAL OPERATING EXPENSE	\$ 45,986	\$ 275,918
NET INCOME FROM OPERATING	<u>\$ 217,578</u>	<u>\$ 1,305,469</u>

* Estimate only. 480 volt, 3-phase electric requirement. This expense may vary.

** Staff training is covered in the monthly service cost. Alliance is responsible for maintenance.

† Mileage Fee is included in the monthly service cost.