

SENT ELECTRONICALLY

September 17, 2021

Shireen Hart
Primmer Piper Eggleston & Cramer PC
30 Main St, Suite 500
PO Box 1489
Burlington, VT 05402

RE: Docket No. GMCB-018-21con, Rutland Regional Medical Center Temporary Use of Mobile MRI

Dear Ms. Hart:

Thank you for your letter dated September 10, 2021, requesting a jurisdictional determination to implement the use of a mobile MRI unit on a temporarily basis at Rutland Regional Medical Center (RRMC).

In your letter you represented that RRMC intends to contract for the use of the mobile MRI 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 magnet strength as the existing fixed MRI unit at RRMC. As is the case at other hospitals in Vermont, RRMC is experiencing a surge in the need for services, including MRI scans. The increased need for MRI services at RRMC is exacerbated by unanticipated periods of inoperability or planned downtime for necessary repairs and maintenance to the existing fixed MRI unit. The existing fixed MRI is now 20 years old and is experiencing increasing downtime when the unit is inoperable, sometimes lasting days instead of a few hours. The extended period of inoperability is frequently due to difficulty in sourcing and acquiring necessary parts for repair. Often the manufacturer is finding necessary parts for repair outside of the United States, which results in a longer delivery times to reach RRMC. During the twelve-month period from June of 2020 through June of 2021, the total inoperable time for the existing fixed MRI was 126 hours.

The letter also represents that the annual operating expenses for one-year are projected to be approximately \$551,832.

As represented in your letter dated September 10, 2021, the project is not subject to certificate of need (CON) review under 18 V.S.A. § 9434(b)(2) (3) at this time. As you proceed with developing and implementing this project, if there are any changes in type, scope, duration or cost of the project, please contact the Board immediately so we may determine whether any



further process is necessary. Failure to do so as required by Green Mountain Care Board Rule 4.301(4) may result in sanctions as specified in 8 V.S.A. § 9445.

If you have further questions, please do not hesitate to contact me at 802-760-8162.

Sincerely,

s/ Donna Jerry

Donna Jerry, Senior Health Policy Analyst
Green Mountain Care Board

cc: Michael Barber, General Counsel, GMCB