

**DIVISION OF HEALTH PLANNING
AND RESOURCE DEVELOPMENT
MAY 2012**

**CON REVIEW: HG-FE-0312-006
CLARKSDALE HMA, LLC D/B/A NORTHWEST MISSISSIPPI
REGIONAL MEDICAL CENTER
ACQUISITION OR OTHERWISE CONTROL OF
MAGNETIC RESONANCE IMAGING (MRI) EQUIPMENT AND
CONVERSION OF MOBILE MRI SERVICES TO FIXED SERVICES
LOCATION: CLARKSDALE (COAHOMA COUNTY) MISSISSIPPI
CAPITAL EXPENDITURE: \$387,500**

STAFF ANALYSIS

I. PROJECT SUMMARY

A. Applicant Information

Clarksdale HMA, LLC d/b/a Northwest Mississippi Regional Medical Center (NWMRMC), is a 195-bed, short term general acute care facility, located in Clarksdale, Mississippi. Clarksdale HMA, LLC a limited liability company, was formed September 25, 2008. NWMRMC is a for-profit limited liability company owned by Health Management Associates, Inc., Naples, Florida. The Hospital is governed by a 13-member Board of Trustees.

The Hospital is licensed for 181 general acute care beds and 14 rehabilitation beds.

The occupancy rates, average lengths of stay (ALOS), and the Medicaid utilization rates for Northwest Mississippi Regional Medical Center (medical/surgical beds only) are shown below:

**Northwest Mississippi Regional Medical Center
Utilization Data**

Fiscal Year	Occupancy Rate (%)	ALOS (Days)	Medicaid Utilization Rate (%)
2009	37.05	4.05	26.91
2010	37.18	4.04	28.74
2011*			

Source: Division of Health Facilities Licensure and Certification, MSDH.

Note:* Northwest Mississippi Regional Medical Center's FY 2011 Annual Hospital Report was not available prior to posting of this staff analysis.

B. Project Description

Clarksdale HMA, LLC d/b/a Northwest Mississippi Regional Medical Center (NWMRMC) requests Certificate of Need (CON) for the acquisition or otherwise control of magnetic resonance imaging (MRI) equipment and conversion of mobile MRI services to fixed MRI services. NWMRMC is authorized to provide mobile MRI services.

The applicant states that currently, Imaging Resources Group, LLC, of Hot Springs, Arkansas is the current mobile MRI vendor for NWMRMC's mobile MRI services. The mobile unit provides MRI services at NWMRMC Monday through Friday for 45 hours per week. The applicant asserts that it is unaware of Imaging Resources Group's plans for the mobile equipment after termination of the hospital's contract. The applicant submits that the hospital's current mobile MRI vendor's (Imaging Resources Group, LLC) contract will be terminated upon CON approval of the proposed project.

The applicant proposes to lease a 1.5 Telsa MAGNETOM Espree magnet from Siemens Medical Solutions USA, Inc. The application contains a preliminary lease proposal between the applicant and Siemens Medical Solutions USA, Inc. concerning the proposed project. The applicant states that the placement of the proposed fixed MRI unit and support space in the hospital will require 705 square feet of renovation in the existing radiology department. In addition, to the MRI room, support spaces will include a control room, equipment room and storage room. Building systems will include gypsum board and metal stud walls, flooring, ceilings, doors, cabinets, HVAC and electrical system. Specialties will include a combination of radio frequency and magnetic shielding with specialty walls, doors and interior windows. The applicant indicates that the MRI shielding originally estimated the amount as \$185,000; however, the actual bid came in much lower (\$39,100).

The capital expenditure for the proposed project is \$387,500 which includes renovation - 47.74 percent; fee - 4.5 percent (architectural, consultant, etc); MRI shielding - 47.74 percent (See capital expenditure summary, page 11). The applicant's parent company, Clarksdale HMA, LLC intends to finance the proposed capital expenditure of \$387,500 for the proposed project. The applicant included a projected operating statement for the first, second, and third years of operation (See Attachment 1).

On February 27, 2012 the Division of Health Facilities Licensure and Certification, MSDH inspected the site at 1970 Hospital Drive, Clarksdale, Mississippi and found the site acceptable, as a result, granted site approval.

According to the applicant, the capital expenditure will be obligated within six (6) months of CON approval. The project will be completed within one (1) year of CON approval.

II. TYPE OF REVIEW REQUIRED

Projects which propose the establishment of MRI services are reviewed in accordance with Section 41-7-191, subparagraphs (1)(d)(xii), and (f) of the Mississippi Code of 1972 Annotated, as amended, and duly adopted rules, procedures, plans, criteria, and standards of the Mississippi State Department of Health.

In accordance with Section 41-7-197 (2) of the Mississippi Code 1972 Annotated, as amended, any person may request a public hearing on this project within 20 days of publication of the staff analysis. The opportunity to request a hearing expires on June 6, 2012.

III. CONFORMANCE WITH THE STATE HEALTH PLAN AND OTHER ADOPTED CRITERIA AND STANDARDS

A. State Health Plan (SHP)

The *FY 2012 State Health Plan* contains policy statements, criteria and standards which an applicant is required to meet before receiving Certificate of Need authority for the acquisition or otherwise control of MRI equipment and/or offering of MRI services and conversion of mobile MRI services to fixed services. This application is in substantial compliance with applicable criteria and standards.

The *FY 2012 State Health Plan* provides that the conversion from mobile MRI service to fixed MRI service is considered the establishment of a new MRI service and requires CON review.

As previously mentioned, Northwest Mississippi Regional Medical Center is authorized to provide mobile MRI services. Imaging Resources Group, LLC, of Hot Springs, Arkansas is the current mobile MRI vendor for NWMRMC's mobile MRI services.

SHP Policy Statement (PS) Regarding (MRI)

PS - 4 Conversion from Mobile MRI to Fixed MRI: The proposed project involves the conversion of the hospital's mobile MRI service to fixed MRI service. This CON application is seeking authority for such conversion.

PS - 5 Utilization of Existing Units: NWMRMC is located in General Hospital Service Area (GHSA 3) and the hospital's identifies its service area which includes the following counties: Coahoma, Tallahatchie, Tunica, Quitman, and Bolivar Counties.

According to the *2012 State Health Plan*, there were 10,584 MRI procedures performed in GHSA 3 during Fiscal Year (FY) 2010 and 4.20 full time equivalent (FTE) MRI units. Therefore, the average number of MRI procedures performed in FY 2010 in GHSA 3 was 2,520.

The applicant submits that this project is for the conversion of mobile MRI services to a fixed service, therefore; this project should not reduce the utilization of existing providers because NWMRMC is a current provider of MRI services.

PS – 6 Population-Based Formula: According to the applicant Northwest Mississippi Regional Medical Center is the only acute care hospital and the only provider of MRI services in Coahoma County. The applicant states that its service area includes the following counties: Coahoma, 26,147, Tallahatchie, 12,872, Tunica, 11,864, Quitman, 7,765 and Bolivar, 36,571 (total population projected 95,219). However, the hospital is located in GHSA 3, which has a total population projection of 206,726.

When applying the *2012 State Health Plan's Population-Based Formula for Projection of MRI Service Volume*, utilizing the *Mississippi Population Projections for 2015, 2020, and 2025, September 2008* shows the MRI volume for Coahoma County and GHSA 3. See Formula for results below.

Population-Based Formula for Projection of MRI Service Volume

$$X*Y \div 1,000=V$$

Where, X = Applicant's Defined Service area population

Y = Mississippi MRI Use Rate

V = Expected Volume

$$\frac{26,147 \text{ (Coahoma County's population projections)}}{1,000} = 26,147$$

$$26,147 * 82.12 \text{ (MS MRI use rate)} = 2,147$$

$$\frac{206,726 \text{ (GHSA 3 population projections)}}{1,000} = 206,726$$

$$206,726 * 82.12 \text{ (MS MRI Use Rate)} = 16,976$$

The applicant notes that when applying the Mississippi MRI use rate to the population projection of GHSA 3 it statistically generates 16,976 MRI procedures, which is 6,392 more than the number of procedures actually performed in GHSA 3 in 2010. The applicant states that based on the utilization data for GHSA 3 and the NWMRMC's service area, the population based formula clearly indicates there is sufficient population base in GHSA 3 and the applicant's service area to support the proposed project.

Criteria and Standards for the Acquisition or Otherwise Control of MRI Equipment

SHP Criterion 1 – Need

An entity desiring to offer MRI services must document that the equipment shall perform a minimum of 2,700 procedures by the end of the second year of operation, according to the *FY 2012 State Health Plan*.

The applicant indicates that the proposed project is to seek approval for the conversion of a mobile MRI unit to a fixed MRI unit.

According to the *2012 State Health Plan*, Northwest Mississippi Regional Medical Center performed a total of 1,704 MRI procedures in 2009 and 1,968 in 2010. The applicant asserts that it provided 1,726 MRI procedures in 2011.

The applicant makes the following projections of MRI procedures to be performed during the first and second years of operation:

Year 1	Year 2
2,973	3,062

Northwest Mississippi Regional Medical Center is the only acute care hospital and the only provider of MRI services in Coahoma County. As previously stated, the applicant indicates its service area as Coahoma, County, Bolivar County, Tunica County, Tallahatchie County, and Quitman County.

As previously mentioned, the *2012 State Health Plan* indicates a population projection of 26,147 for Coahoma County and 206,726 for GHSA 3 in 2015 with a Mississippi MRI use rate of 82.12. Applying the Mississippi MRI use rate to the population projection in GHSA 3 revealed the number of MRI procedures that statistically will be generated by the residents of GHSA 3 will be 16,976. Additionally, when calculating the population projections for NWMRMC's identified service area Coahoma, County, Bolivar County, Tunica County, Tallahatchie County, and Quitman County (total population projected 95,219) with the Mississippi MRI use rate of 82.12 equates to 7,819 MRI procedures.

The application contained 12 affidavits signed by physicians attesting to a total of 1,255 MRI procedures annually; however, the applicant anticipates it will continue to provide the scans it has historically provided in addition to the scans projected in the affidavits (1,726 scans last year plus the 1,255 projected to equal a total of 1,981 MRI scans. The

applicant believes that NWMRMC's service area will support an increase in the number of scans based on the Mississippi MRI use rate. The hospital's service area could be expected to produce 7,379 scans (excluding additional population in Arkansas that could also be anticipated to produce scans). NWMRMC asserts that not only does the hospital's service area population support additional scans, the overall GHSA, based on the Mississippi MRI use rate, could be expected to produce more scans than it actually generated (use rate would generate 16,976 scans while GHSA 3 reported 10,584 MRI procedures for FY 2010).

Northwest Mississippi Regional Medical Center states that in order to present a conservative estimate of the financial feasibility of the project, it did not account for all of the procedures projected in the affidavits in the first and second year of operation, but did anticipate some growth based on those physicians affidavit numbers (1,255 MRI scans annually). Some of the affidavit projections were taken into years one through three projections. To present a conservative estimate, the hospital did not simply start with the anticipated 2,981 MRI scans (historical plus affidavits) in year one. The applicant asserts that if the hospital based its financial feasibility on all the anticipated MRI scans in year one with a moderate increase over years two and three, the revenue would increase as well as a slight increase in expenses, so that the project would be even more financially feasible.

The applicant states that based on its historical numbers, physician affidavit projections, numerical population support, and an improvement in the public's and medical community's perception of the MRI service, NWMRMC believes it will provide at least 2,700 procedures by the end of the second year of operation.

In addition, the applicant must demonstrate that all existing units within its defined service area have performed an average of 1,700 procedures for the most recent 12-month period. According to the FY 2012 State Health Plan, there were 4.20 FTE units operating in General Hospital Service Area 3 during 2010, for an average of 2,520 procedures per unit (See Attachment 2).

SHP Criterion 2 – Quality Assurances

The applicant acknowledges the requirements of this criterion and will comply for the proposed project. The applicant proposes to lease a 1.5 Telsa MAGNETOM Espree magnet from Siemens Medical Solutions USA, Inc. The application contains a preliminary lease proposal between the applicant and Siemens Medical Solutions USA, Inc. concerning the proposed project.

SHP Criterion 3 – Information Recording/Maintenance

The applicant affirms that, at a minimum, it will record and maintain the requirements listed in this criterion and will be kept and made available to the Mississippi State Department of Health within 15 business days of request.

SHP Criterion 4 – Registration

The application contains documentation of formation and listing of good standing in the State of Mississippi for Clarksdale HMA, LLC d/b/a Northwest Mississippi Regional Medical Center.

SHP Criterion 5 – CON Approval

The applicant submits this application for the conversion of the hospital's mobile MRI service to fixed MRI service and equipment.

Criteria and Standards for the Offering of Fixed or Mobile MRI Services

SHP Criterion 1 – Need

The applicant projects to perform 2,381, 2,973, and 3,062 procedures the first, second, and third year of operation, respectively. These projections meet and exceed the minimum requirement of 2,700 procedures required by the end of the second year of operation.

As previously mentioned, the application contained 12 affidavits signed by physicians attesting to a total of 1,255 MRI procedures annually; however, this application is for the conversion of a mobile MRI unit to a fixed MRI unit at an existing hospital.

SHP Criterion 2 - Documentation of Diagnostic Imaging Modalities

The applicant affirms that the hospital currently provides the services required of this criterion.

SHP Criterion 3 – Accessibility

The applicant submits that NWMRMC does not have admission policies that exclude patients because race, color, age, sex, ethnicity, or ability to pay.

SHP Criterion 4 - Staffing

Northwest Mississippi Regional Medical Center anticipates that Hunter Nelson, M.D. will serve as medical director and the hospital will employ an MRI technician-radiographer with the required training by this criterion.

SHP Criterion 5 – Research Staffing

The applicant indicates that the proposed fixed MRI unit will not be used for experimental procedures.

SHP Criterion 6 – Data Requirement

The applicant affirms that the data requirements listed for this criterion will be kept and made available to the Mississippi State Department of Health upon request. The applicant asserts that it recognizes that to the extent it is within the scope of its recording system, and will maintain source of payment and total amounts charged for the fiscal year.

SHP Criterion 7 – CON Approval

As stated previously, the applicant submits this application for the conversion of the hospital's mobile MRI service to fixed MRI service and equipment.

B. General Review (GR) Criteria

Chapter 8 of the *Mississippi Certificate of Need Review Manual, 2011 revision*, addresses general criteria by which all CON applications are reviewed. This application is in substantial compliance with general review criteria contained in the Manual.

GR Criterion 1 – State Health Plan

The application was reviewed for compliance with the *FY 2012 State Health Plan* as previously discussed.

GR Criterion 2 – Long Range Plan

The applicant states that NWMRMC proposes to improve the healthcare of residents within its service area and its patients. The addition of fixed MRI series at NWMRMC will better enable the hospital to reach this goal.

GR Criterion 3 – Availability of Alternatives

The applicant contends that NWMRMC considered maintaining its mobile MRI service but decided converting to a fixed unit would give it more control over the quality of services, improve efficiency and positively impact the public's perception of the services. The applicant asserts that the proposed conversion to a fixed unit will be more cost effective than maintaining the mobile lease.

GR Criterion 4 – Economic Viability

According to the applicant, the three-year projected operating statement contained in the application indicates net income of \$427,179 the first year, \$496,345 the second year, and \$580,548 the third year of operation.

The applicant states that the cost for an MRI scan will be \$158 per scan and the charge to patients will be \$1,181 per scan the first year of operation.

As previously stated, the hospital's proposed conversion from mobile to fixed MRI services is more cost effective than maintaining mobile services. However, the applicant states that should the hospital fail to meet projected revenues, Clarksdale HMA, LLC the hospital' parent company, has sufficient capital to fund the shortfall.

According to the applicant, the cost of healthcare should not be impacted by the proposed project. The hospital's charges to both Medicare and Medicaid will remain similar to other providers.

Staff concluded that the proposed project will be economically viable by the third year of operation.

GR Criterion 5 – Need for Project

The applicant submits that all residents of the area will have access to the proposed fixed MRI. NWMRMC currently treats many of the traditionally underserved groups listed for this criterion and anticipates continuing to provide service to these groups with the proposed fixed MRI service.

Northwest Mississippi Regional Medical Center asserts that per the current *Plan*, the service area's facilities' MRI scans slightly decreased from the last year but have still remained well above the minimum requirement. The hospital's conversion to a fixed service should not significantly impact these facilities because NWMRMC currently provides MRI services.

The applicant states that the population base and the actual number of procedures performed in the service indicate there should not be an effect on existing providers. Upon completion of the proposed project, there will be no net change in the number of MRI units in the service area.

The applicant asserts that the final objectives of the proposed project is to provide fixed MRI services at the hospital in order to assist physicians in the diagnosis and treatment of patients.

The application contains twenty-three (23) letters of support for the proposed project.

The Department did not receive any letters of opposition concerning the proposed project.

GR Criterion 6 – Access to the Facility or Service

The applicant asserts that all residents of the health planning service area, hospital service area, and patient service area, including Medicaid recipients, charity/medically indigent patients, racial and ethnic minorities, women, handicapped persons, and the elderly currently has access to the services.

The applicant submits that the actual and projected percentage of gross patient revenue (GPR) health care provided to medically indigent and charity care patients for the last two years are as follows for this project:

	Medically Indigent (%)	Charity Care (%)
2009	7.02	2
2010	6.93	2
Projected year 1	6.95	2
Projected year 2	6.95	2

According to the applicant, all payor sources and indigent patients will be able to receive fixed MRI services at the hospital upon CON approval. All patients including those that are medically indigent will have access to the proposed fixed MRI services just as there currently have access to the mobile MRI services.

GR Criterion 7 – Information Requirement

The applicant affirms that it will record and maintain the information required by this criterion and make it available to the Mississippi State Department of Health within 15 business days of proper request.

GR Criterion 8 – Relationship to Existing Health Care System

The applicant submits that the proposed project is for the conversion of mobile MRI service to a fixed MRI service and the acquisition of MRI equipment. They do not contemplate the addition of a new MRI provider in Coahoma County, NWMRMC is located in GHSA 3. The applicant believes that with fixed services it will have more control over the quality of the services provided and the services will be more accessible to patients.

According to the *2012 Plan*, GHSA 3 had a total of six (6) MRI sites (mobile and fixed) in FY 2009 and FY 2010 utilizing 4.20 FTE MRI units. These sites and units performed a total of 11,228 MRI procedures in 2009 and 10,584 MRI procedures in 2010, with an average of 2,673 per FTE unit for FY 2009 and 2,520 FTE units for FY 2010. See Attachment 2.

Staff concludes that this project should have no significant adverse affect on existing MRI providers in GHSA 3.

The Department has not received any letters of opposition for the proposed project

GR Criterion 9 - Availability of Resources

According to the applicant, minimal new personnel are anticipated to be necessary for this project. If any additional personnel are needed, they will be recruited through traditional advertising and word-of-mouth. NWMRMC asserts that it is a 181-bed general acute care hospital that maintains adequate staff.

GR Criterion 10 – Relationship to Ancillary or Support Services

According to the applicant, NWMRMC will provide any necessary support and ancillary services for the propose project

GR Criterion 11- Health Professional Training Programs

According to the applicant, NWMRMC maintains training relationships with Delta State University and Coahoma Community College.

GR Criterion 16– Quality of Care

Northwest Mississippi Regional Medical Center is in compliance with the *Minimum Standards for the Operation of Mississippi Hospitals*, according to the Division of Health Facilities Licensure and Certification, MSDH.

The hospital is Joint Commission accredited.

IV. FINANCIAL ANALYSIS

A. Capital Expenditure Summary

The total estimated capital expenditure is allocated as follows:

	Item	Cost	Percent of Total
a.	Construction Cost – New	0	0
b.	Construction Cost – Renovation	\$185,000	47.74%
c.	Capital Improvements	0	0
d.	Total Fixed Equipment Cost	0	0
e.	Total Non-Fixed Equipment Cost	0	0
f.	Land Cost	0	0
g.	Site Preparation Cost	0	0
h.	Fees (Architectural, Consultant, etc.)	\$17,500	4.5%
i.	Contingency Reserve	0	0
j.	Capitalized Interest	0	0
k.	Other –MRI Shielding	<u>185,000</u>	<u>47.74%</u>
	Total Proposed Capital Expenditure	<u>\$387,500</u>	<u>100%</u>

The above estimated capital expenditure is proposed for the acquisition or otherwise control of magnetic resonance imaging (MRI) equipment and conversion of mobile MRI services to fixed MRI services at NWMRMC. The project consists of approximately 705 square feet of renovation at an estimated cost of \$287.23 per square foot. The *RSMMeans Building Construction Cost Data, 2012 Edition* does not contain cost per square feet estimates for renovation projects.

B. Method of Financing

As previously stated, the applicant's parent company, Clarksdale HMA, LLC intends to finance the proposed capital expenditure \$387,500 for the proposed project. The applicant included a projected operating statement for the first, second, and third years of operation (See Attachment 1).

C. Effect on Operating Costs

With regard to this project, the applicant's projected Operating Statement for Northwest Mississippi Regional Medical Center for the first three years of operation is listed as Attachment 1.

D. Cost to Medicaid/Medicare

The cost of the project to third party payors is as follows (based on gross patient revenue):

Patient Mix by Payor	Utilization Percentage	First Year Revenue
Medicare	34%	\$965,386
Medicaid	27%	749,276
Commercial	25%	696,323
Self Pay	1%	32,199
Charity Care	10%	282,673
Other	<u>3%</u>	<u>87,216</u>
Total	100%	\$2,813,073

V. RECOMMENDATION OF OTHER AFFECTED AGENCIES

The Division of Medicaid estimates that the increased annual cost to Medicaid for the proposed project will be \$58,202 in inpatient hospital services. Outpatient services are paid based on a facility's cost to charge ratio, as outlined in the *Medicaid State Health Plan*. Any services resulting from this project will be reimbursed using that methodology. Consequently, any additional cost to the Division of Medicaid cannot be determined at this time. The Division of Medicaid opposes this project.

VI. CONCLUSION AND RECOMMENDATION

This project is in compliance with the policy statements, criteria and standards for the acquisition or otherwise control of MRI equipment and offering of fixed MRI services as contained in the *FY 2012 Mississippi State Health Plan*; Chapter 8 of the *Mississippi Certificate of Need Review Manual, Revision 2011*; and all adopted rules, procedures, and plans of the Mississippi State Department of Health.

The Division of Health Planning and Resource Development recommends approval of the application submitted by Clarksdale HMA, LLC d/b/a Northwest Mississippi Regional Medical Center for the acquisition or otherwise control of MRI equipment and conversion of MRI services from mobile to fixed.

ATTACHMENT 1
Northwest Mississippi Regional Medical Center
PROJECTED OPERATING STATEMENT (Project Only)

	Year 1	Year 2	Year 3
Revenue			
Inpatient Care Revenue	0	0	0
Outpatient Care Revenue	\$2,813,073	\$3,057,107	\$3,322,311
Gross Patient Care Revenue	\$2,813,073	\$3,057,107	\$3,322,311
Deduction From Revenue			
Charity/Indigent Care	\$282,673	\$307,195	\$333,844
Deduction from Revenue	1,726,664	1,876,453	2,030,199
Net Patient Care Revenue	\$803,735	\$873,459	\$958,268
Net Patient Care Revenue	\$803,735	\$873,459	\$958,268
Total Operating Revenue	<u>\$803,735</u>	<u>\$873,459</u>	<u>\$958,268</u>
Operating Expenses			
Salaries	0	0	0
Benefits	0	0	0
Supplies	6,430	6,988	7,594
Services	0	0	0
Lease	360,000	360,000	360,000
Depreciation	10,126	10,126	10,126
Interest	0	0	0
Other	0	0	0
Total Operating Expense	<u>376,556</u>	<u>377,114</u>	<u>377,720</u>
Net Operating Income	\$427,179	\$496,345	\$580,548
Assumptions			
Number of Scans	2,381	2,973	3,062
Charge per Scan	\$1,181	\$1,028	\$1,085
Cost per Scan	\$158	\$127	\$123

Attachment 2
General Hospital Service Area 3
Location and Number of MRI Procedures
FY 2012 State Health Plan

Facility	Location	Type/No. of Equip.	Number of Procedures FY 2009	Number of Procedures FY 2010	Days Operated 2010	FTE Unit 2010
Bolivar Medical Center	Cleveland	M	1,439	869	M-F, 40 hrs.	1.00
Delta Reg. Med. Ctr.- Main Campus	Greenville	F	3,205	3,120	M-F, 40 hrs.	1.00
Greenwood Leflore Hospital	Greenwood	F	4,115	3,877	M-F, 40 hrs.	1.00
Northwest Ms Reg. Med. Center	Clarksdale	M	1,704	1,968	M-F, 45 hrs.	1.00
P&LC- North Sunflower Co. Hosp.	Ruleville	M	235	268	Tue., 4 hrs.	.10
South Sunflower County Hospital	Indianola	M	530	482	Wed., 4 hrs.	.10
Total			11,228	10,584		4.20
Average Proc/MRI FTE			2,673	2,520		

F – Fixed
 M - Mobile
 FTE – Full-Time Equivalent