

**MISSISSIPPI STATE DEPARTMENT OF HEALTH
DIVISION OF HEALTH PLANNING
AND RESOURCE DEVELOPMENT
SEPTEMBER 28, 2026**

**CON REVIEW: CC-NIS-0826-009
BRIDGE PROTON THERAPY, LLC
ESTABLISHMENT OF A PROTON THERAPY CENTER- OFFERING OF PROTON THERAPY
SERVICES AND ACQUISITION OF PROTON THERAPY EQUIPMENT
CAPITAL EXENDITURE: \$78,193,957.00
LOCATION: FLOWOOD, RANKIN COUNTY, MISSISSIPPI**

STAFF ANALYSIS

I. PROJECT SUMMARY

A. Applicant Information

Bridge Proton Therapy, LLC ("Bridge" or the "Applicant") is a Mississippi limited liability company registered with the State of Mississippi on November 18, 2025. The application contains a Certificate of Good Standing, dated July 6, 2026, from the Office of the Secretary of State, Jackson, Mississippi indicating that Bridge Proton Therapy, LLC is in good standing with the State of Mississippi.

Bridge has two (2) member-managers.

B. Project Description

Bridge Proton Therapy, LLC ("Bridge" or the "Applicant") proposes to establish Mississippi's first freestanding proton therapy center (the "Center"). The new 24,300 square-foot facility will be constructed in Rankin County, selected for its accessible, central location. It will feature a state-of-the-art proton therapy system, a dedicated treatment vault, clinical control areas, imaging and simulation rooms, and patient-focused spaces for consultation, preparation, and recovery.

The Applicant states that the Center represents an important step in bringing advanced cancer treatment options to patients across Mississippi. The Applicant submits that while conventional radiation therapy remains a vital component of cancer care, Mississippi currently lacks proton therapy – a highly specialized treatment that can precisely target tumors while minimizing damage to surrounding healthy tissue. In addition, the Applicant states that while Mississippi is served by highly qualified oncology providers, access to advanced cancer treatment as proposed in the application remains a significant challenge because of the State's geography, rural population, distribution, socioeconomic characteristics, and the absence of an in-state proton therapy center. The Applicant proposes to address these access barriers by establishing the State's first proton therapy program as a statewide specialty oncology resource.

The Applicant states, unlike conventional megavoltage radiation therapy that is generally photon-based external beam radiation delivered by a linear accelerator that uses high energy rays, the photon therapy proposed is particle therapy that will utilize a cyclotron-based machine. The *FY 2022 State Health Plan, Fourth Edition (August 2026)* recognizes that proton therapy represents one (1) of the most significant advances in radiation oncology by enabling highly precise delivery of radiation while substantially reducing unnecessary doses to surrounding healthy tissues and critical organs. The Applicant states unlike conventional photon radiation, proton therapy deposits most of its energy directly within the tumor and minimizes radiation beyond the target, allowing physicians to safely escalate treatment in appropriately selected patients while reducing treatment-related toxicity.

The Applicant states that the proposed Center has been intentionally designed as a compact, financially responsible program capable of expanding access to highly specialized care while preserving flexibility as clinical evidence, treatment indications, and patient needs continue to evolve. According to the Applicant, the compact single-room proton therapy system proposed reflects responsible capital planning, responsible stewardship of healthcare resources, and consistency with the objectives of the State Health Plan by expanding access to a currently unavailable service while minimizing the risk of unnecessary duplication or excess capacity. Further, the Applicant states as patient demand and clinical evidence evolve over time, the proposed model provides the flexibility to respond appropriately without exceeding the demonstrated needs of the State. Therefore, the Applicant believes that the proposed project appropriately matches the demonstrated need within Mississippi, avoids unnecessary duplication of highly specialized services, and provides a sustainable model capable of serving patients across the State through conservative utilization assumptions.

The Applicant states the 24,300 square foot Center includes the 845 square foot treatment vault and related clinical, patient care, equipment, support and administrative spaces necessary to operate the Center. The equipment is a fixed ProteusOne (compact proton therapy system) that will be installed at or near vault completion or approximately six (6) months from completion of construction (estimated at August 2027).

The Applicant states the final objective of the proposed project is to enable the provision of advanced cancer treatment through proton therapy for Mississippians.

The application includes a proposed schematic and site plan, cost estimate, and a depreciation schedule. The application also includes a letter from the Division of Fire Safety and Construction, Bureau of Health Facilities Licensure and Certification, dated April 2, 2026, indicating that the proposed project does not require site approval.

The proposed project is expected to require 45 full-time equivalent personnel at a cost of \$4,488,341.00 in the first year.

The Applicant proposes a capital expenditure of \$78,193,957.00, as itemized in Section IV of this Staff Analysis. The Applicant anticipates that the capital expenditure will be obligated upon CON approval and that completion will be within one (1) year of start date. However, the Applicant states that due to the size of the facility and necessary specialized construction for the vault and equipment, it expects it will be required to file Six-Month Extension requests.

The Applicant certifies that the proposed project will comply with state and local building codes, zoning ordinances, and appropriate regulatory authority.

The Applicant affirms that it will comply with all State statutes and regulations for the protection of the environment, including: 1) approved water supplies; 2) sewage and water disposal; 3) hazardous waste disposal; 4) water pollution control; 5) air pollution control; and 6) radiation control.

The Applicant states there are currently no specific requirements by the Division of Radiological Health related to proton therapy services; however, Bridge will work with the Division of Radiological Health regarding compliance with its requests and requirements during development of the Center prior to and during its operation.

II. TYPE OF REVIEW REQUIRED

The Mississippi State Department of Health (“MSDH”) will review applications for a Certificate of Need (CON) for the establishment of a proton therapy center, acquisition of photon therapy equipment, and offering of proton therapy services under the requirements of Sections 41-7-173, 41-7-191, and 41-7-193, Mississippi Code of 1972 Annotated, as amended. MSDH will also review applications for CON according to the general review criteria listed in the *Mississippi Certificate of Need Review Manual, August 2026, Revision*; all adopted rules, procedures, plans, criteria and standards of the MSDH.

In accordance with Section 41-7-197(2) of the Mississippi code 1972 Annotated, as amended, any affected person may request a public hearing on this project within ten (10) days of publication of the staff analysis. The opportunity to request a hearing expires on October 8, 2026.

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

A. Mississippi State Health Plan (MSHP)

The *FY 2022 Mississippi State Health Plan, Fourth Edition*, contains policy statements, criteria and standards for review of CON applications proposing the establishment, acquisition, expansion, or relocation of proton accelerator services.

Policy Statements Regarding Certificate of Need Applications for the Acquisition or Otherwise Control of Proton Therapy Equipment and/or the Offering of Proton Therapy Services

1. Definition:

The Applicant acknowledges that proton accelerator service means a healthcare service utilizing proton beam therapy technology for the treatment of cancer, other medically appropriate conditions and seeks to provide this service.

2. Planning Area:

The Applicant acknowledges that the planning area for proton accelerator services shall be statewide. The Applicant submits Bridge has chosen the proposed site for its statewide accessibility, which is within the Jackson Metropolitan Statistical Area and immediately adjacent to Mississippi's major interstate and highway system which will provide access for patients traveling from different regions of the State.

3. Limitation on Duplication:

The Applicant acknowledges this Policy Statement; however, states that it is not applicable to the project as the application proposes the first proton therapy service and necessary equipment.

4. Annual Review:

The Applicant acknowledges this statement and certifies Bridge will make its utilization data available to the Department.

Certificate of Need Criteria and Standards for the Acquisition or Otherwise Control of Proton Therapy Equipment and/or Offering of Proton Therapy Services

The Mississippi State Department of Health will review applications for a Certificate of Need for the acquisition or otherwise control of Proton Therapy equipment and/or the offering of Proton Therapy services under the applicable statutory requirements of Sections 41-7-173, 41-7-191, and 41-7-193, Mississippi Code of 1972, as amended. The MSDH will also review applications for Certificate of Need according to the policies in this Plan; the general criteria listed in the Mississippi Certificate of Need Review Manual; all adopted rules, procedures, and plans of the Mississippi State Department of Health; and the service specific criteria and standards listed below.

The acquisition or otherwise control of Proton Therapy equipment is reviewable if the equipment costs exceed \$3,000,000.00. The offering of Proton Therapy

services is reviewable if the proposed provider has not provided those services on a regular basis within the period of twelve (12) months prior to the time such services would be offered.

SHP Need Criterion 1: Demonstration of Need

According to the Applicant, there is no data publicly available, specifically identifying Mississippi residents receiving proton therapy services. However, the Applicant states it has included estimates that take into account the Mississippi population, Mississippi cancer incidence rates, published radiation therapy utilization estimates, nationally recognized proton therapy indications, published community utilization data for proton centers, proton therapy locations and conservative operational assumptions for the new Center.

A. Mississippians Receiving Proton Therapy

The Applicant submits per the American Cancer Society projections, approximately 18,000 new cancers are diagnosed annually in Mississippi and Oncology models have consistently demonstrated that more than fifty percent (50%) of cancer patients will receive radiation therapy during the course of their disease. The Applicant states it applied a fifty to sixty percent (50%-60%) rate to Mississippi's incidence of new cancer diagnoses, suggesting that approximately 9,000 to 10,800 radiation therapy treatment courses are delivered annually to Mississippi cancer patients. However, the Applicant points out that proton therapy has a lower utilization rate than traditional radiation therapy. (See Exhibits F and G of the application).

According to the Applicant, per a ten (10) year study of compact proton therapy services (see Exhibit H of application), it is anticipated that fifteen and two tenths' percent (15.2%) of patients receiving radiation treatment utilize proton therapy. The Applicant states that Bridge chose to use a more conservative percentage rather than the high utilization for its new Center's calculations.

Based on the information above, the Applicant states approximately 1,368-1,641 Mississippians could be candidates for proton therapy; however, actual utilization by Mississippians is anticipated to be significantly lower because the State currently has no proton therapy center. According to the Applicant, patients requiring proton therapy must travel outside of Mississippi, creating geographic, financial, insurance, and logistical barriers that may prevent clinically appropriate patients from receiving proton therapy.

The Applicant submits that Bridge is not proposing to meet the entirety of the potential statewide demand; rather, the proposed Center has been designed as a single-room compact facility with conservative projected volumes which represent only a modest portion of Mississippi's projected radiation therapy population and demonstrate that the proposed project is appropriately scaled to expand access while containing costs.

B. Those Receiving Proton Therapy

The Applicant submits that Mississippi currently has no proton therapy center; accordingly, patients receiving proton therapy must travel outside the State to receive treatment. The Applicant states depending upon physician referral relationships, insurance coverage, and geographic considerations, Mississippi residents would most likely receive proton therapy at centers located in Nashville, TN; Shreveport, LA; Little Rock, AR; Atlanta, GA; and Houston, TX. Bridge states the travel time to services disproportionately impacts rural populations, elderly, financially vulnerable patients and patients requiring caregiver assistance. The Applicant states the proposed Center will be closer to most Mississippians, which will improve access and decrease disproportionate access to specialized services by underserved groups.

C. Referral Patterns

The Applicant states that currently patients receiving proton therapy are referred by radiation oncologists, medical oncologists, surgeons, and hospitals to out-of-state proton therapy centers. The Applicant states the proposed Center will establish an in-state referral destination while preserving existing physician relationships. The Applicant states Bridge will accept referrals from all physicians and hospitals regardless of affiliation, ensuring equitable statewide access.

D. Clinical Conditions and Patient Populations

The Applicant states that the proposed Center will provide treatment for patients whose disease characteristics and clinical circumstances are supported by current evidence and nationally recognized guidelines. The Applicant states that Bridge's planning assumptions were based on the types of cancers most commonly considered clinically appropriate for proton therapy, including:

- Head and neck,
- Central Nervous System (CNS) skull base,
- Pediatrics,
- Breast,
- Thoracic/lung
- Prostate/genitourinary (GU),
- Gastrointestinal,
- Sarcoma, and
- Selected gynecologic malignancies

To anticipate the expected referral patterns and utilization, the Applicant states Bridge also considered nationally recognized proton therapy indications

including the American Society for Radiation Oncology Proton Beam Therapy Model Policy categories (“ASTRO Model” or “ASTRO”), (see Exhibit I of the application) and the National Comprehensive Cancer Network disease-site guidance.

The Applicant states the ASHRO’s framework is useful because it distinguishes between more established proton therapy indications and indications that may require additional documentation, medical necessity review, or comparative planning.

E. Projected Annual Patient Volumes:

The Applicant states that Bridge anticipates treating 180 patients in Year 1 and 275 patients in both Year 2 and Year 3. The Applicant states that an article by Willis-Knighton, Shreveport, LA Center, found that ninety percent (90%) of its treated patients resided within approximately 100 miles of the proton therapy center, underscoring the importance of geographic proximity in improving patient’s access. According to the Applicant, a majority of the State’s population will be located within 100 miles of the Center, and over eighty percent (80%) of Mississippi’s population will have less travel time to the Flowood Center location than other out-of-state proton therapy options.

The Applicant states as the State’s only proton therapy provider, Bridge anticipates that, similar to Willis-Knighton’s experience, the Center will treat Mississippi residents. In addition, the Applicant states approximately eighty-three percent (83%) of the State’s population is within three (3) hours from the proposed Center with ninety-four percent (94%) of the State’s population within four (4) hours from the proposed Center, potentially making the proposed Center closer than other options for residents of the State, not on the Louisiana, Arkansas, or Tennessee borders.

With an anticipated incidence rate in Mississippi of new cancer cases (18,000), and fifty to sixty percent (50-60%) of those cases needing radiation therapy (9,000- 10,800), Applicant states approximately 1,350-1,620 Mississippians could be expected to meet clinical standards to receive proton therapy based on the fifteen percent (15%) estimate of proton therapy utilization per Willis-Knighton’s ten (10) year study.

According to the Applicant, proton therapy is delivered in fractions. Each patient receives one fraction per visit. The number of fractions a patient receives is not fixed, and it also varies by tumor location. For purposes of projecting the Center’s utilization, the Applicant anticipates that each patient will receive 28-29 fractions. The Applicant states this results in 5,050-5,220 treatment fractions in Year 1 and 7,700-7,975 fractions in Years 2 and 3.

SHP Need Criterion 2: Clinical Appropriateness

The Applicant asserts that the Center will utilize national guidelines regarding evidence-based patient selection criteria, consistent with national standards of care and clinical evidence. The Applicant state clinical decision-making will be guided by recommendations from the patient's cancer team and by:

- American Society for Radiation Oncology (ASTRO) Model Policy for Proton Beam Therapy;
- National Comprehensive Cancer Network (NCCN) Clinical Practice Guidelines; and
- Then current peer-reviewed clinical literature.

The Applicant submits that patient selection criteria will also be reviewed periodically to remain consistent with evolving national guidelines and published evidence, including contemporary randomized clinical trials demonstrating reduced treatment-related toxicity for appropriately selected patients treated with proton therapy.

SHP Need Criterion 3: Access

The Applicant states that Bridge chose Rankin County as the site for the proposed Center due to its proximity to access from across the State. The proposed Center is intended to serve as a statewide clinical resource that is reasonably accessible to patients throughout Mississippi regardless of payment source, the patient's treating physician, hospital, or health system affiliation.

The Applicant certifies that it will accept Medicare beneficiaries; that it will participate in the Mississippi Medicaid program if eligible to do so under Medicaid's requirements; that it will maintain charity care (and financial assistance) policies consistent with applicable law; and that it will accept referrals from all physicians and/or hospitals regardless of affiliation.

The Applicant states that ultimately Bridge intends to operate the proposed Center through a collaboration consortium model that provides opportunities for participation by health systems, hospitals, oncology practices, and physicians throughout Mississippi. This structure is intended to promote statewide collaboration, preserve referral relationships, strengthen existing oncology programs, and ensure equitable access to proton therapy.

SHP Need Criterion 4: Financial Feasibility

A. The financial feasibility of the proposed service;

The Applicant states the proposed Center has been intentionally designed as a financially responsible proton therapy program utilizing a compact single-room proton therapy system.

B. Availability of sufficient capital resources;

Bridge states it has identified sufficient capital resources for project development as demonstrated in project-specific capital documentation, financial assumptions, and supporting financial spreadsheets attached.

C. Projected operating sustainability; and

The Applicant states projected patient volumes of 180 patients during Year 1 and approximately 275 patients annually thereafter are intentionally conservative and are supported by published experience from comparably sized proton therapy centers.

D. Reasonable utilization assumptions.

The Applicant states the Center's proposed utilization assumptions appropriately match the need within Mississippi for a new Center while avoiding unnecessary duplication of services and containing costs. The Applicant believes that conservative assumptions regarding patient volume, reimbursement, payor mix, and operating expenses demonstrate the long-term financial sustainability of the project.

SHP Need Criterion 5: Staffing and Clinical Resources

The Applicant states the Center will be staffed by qualified multidisciplinary professionals capable of delivering safe, high-quality proton therapy.

SHP Need Criterion 6: Integration with Existing Cancer Services

The Applicant states the proposed Center is intended to complement existing oncology services throughout Mississippi rather than duplicate them by serving as a statewide clinical resource. By centralizing the delivery of proton therapy while preserving all other aspects of oncology care within local communities, the Applicant states the project will expand the continuum of cancer care available within Mississippi, reduce unnecessary out-of-state travel, improve access to advanced radiation therapy, and strengthen the overall oncology infrastructure of the State of Mississippi. The Applicant states patients will continue receiving surgery, medical oncology, diagnostic imaging, pathology and long-term follow-up within their local communities. The Applicant further states that proton therapy will represent one (1) component of a coordinated treatment plan, allowing patients to remain under the care of their local oncology teams.

The Applicant states that in the future, Bridge plans to operate the Center through a collaborative consortium model that provides opportunities by health systems, oncology practices, physicians, and other stakeholders throughout Mississippi. The Applicant states this structure is intended to further promote statewide

collaboration, strengthen existing oncology programs, and improve access to proton therapy for all Mississippi residents regardless of treating physician or hospital affiliation.

SHP Need Criterion 7: Data Reporting

The Applicant states Bridge recognizes that as a condition of approval, it is required to submit annual reports to the Department for five (5) years following initiation of services. The Applicant certifies that Bridge will maintain and submit the following information to the Department: (a) number of patients treated; (b) Mississippi resident utilization; (c) payor mix; (d) referral sources; (e) charity care provided; and (f) other information required by the Department.

SHP Need Criterion 8: MSDH Division of Radiological Health Approval

The Applicant affirms that the proposed site, plans, equipment, shielding design, radiation safety program, commissioning documentation, and related operational documents will be submitted to and approved by the Department's Division of Radiological Health as required, before proton therapy services begin.

B. Certificate Of Need (CON) Manual

Chapter 7 of the *Mississippi Certificate of Need Review Manual, Revised August 2026*, addresses general criteria by which all CON applications are reviewed. The Applicant substantially complies with general criteria as follows:

Criterion 1 – Applicability and Balancing

The Applicant affirms that the proposed project substantially complies with all applicable laws, the CON Review Manual, and the State Health Plan.

Criterion 2 – Consistency with Applicable Law

The Applicant affirms that the proposed project is consistent with all such applicable statutory, regulatory, licensure and federal requirements as evidenced throughout the application.

Criterion 3 – Consistency with State Health Plan

The Applicant affirms that the application demonstrates consistency with the applicable provisions of the State Health Plan, including need methodologies, inventories, planning districts, utilization methodologies, service-specific criteria, and other applicable planning standards.

Criterion 4 – Long Range Development Plan

The Applicant states Bridge's long-range plan is to establish a sustainable, statewide resource through which appropriate, clinical determined Mississippi cancer patients may obtain advanced radiation treatment without traveling outside the state. The Applicant states the proposed Center is intended to function as an independent statewide referral resource that complements existing cancer services by providing the proton therapy component of care while allowing patients to continue receiving surgery, medical oncology, diagnostic imaging, pathology, supportive care, and long-term follow-up within their local communities whenever clinically appropriate. As the Center matures and patient volumes develop, the Applicant states Bridge intends to pursue opportunities for voluntary collaboration, shared clinical pathways, multidisciplinary care coordination, educational initiatives, quality improvement activities, and other cooperative efforts that strengthen Mississippi's overall oncology infrastructure.

Criterion 5 – Need for the Project

A. Need of the Population Served or to be Served;

The Applicant states Mississippi currently has no proton therapy center; therefore, residents who are appropriate candidates must travel outside the state to obtain this treatment creating financial, geographic, and logistical barriers. Using the Office of Management and Budget's Core-Based Statistical Areas, the Applicant states nearly one-half of Mississippi counties are classified as rural, reflecting the geographic dispersion of the State's population and the challenges associated with accessing highly specialized healthcare services.

The Applicant states that these classifications are significant because highly specialized oncology services, including proton therapy, are generally concentrated within metropolitan areas, requiring many rural patients to travel substantial distances for care. Because patients receiving radiation frequently receive 20-35 daily treatments, the Applicant states travel related costs (i.e. lodging, meals, lost wages, childcare, caregiver time, etc.) can create a barrier to services, especially for underserved groups. Bridge states the Mississippi-based Center will improve accessibility to specialized services for these patients.

The Applicant states that the proposed Center will make services available based on clinical need without regard to race, ethnicity, sex, age, disability, physician affiliation, or hospital affiliation. In addition, the Applicant states Bridge will accept Medicare and Medicaid beneficiaries, maintain charity care and financial assistance policies. Accordingly, the anticipated patient population will include low-income persons, racial and ethnic minorities, women, persons with disabilities, other underserved groups, and elderly patients.

B. In the Case of Relocation, the Need of the Population Presently Served;

The Applicant states as the proposed project does not involve relocation, this line item is not applicable.

C. The Current and Projected Utilization of Like Facilities;

The Applicant submits that cancer care continues to evolve toward increasingly personalized, precision-based treatment strategies that seek not only to improve disease control but also to reduce treatment-related toxicity and preserve long-term quality of life. The Applicant states advances in treatment planning, molecular diagnostics, systemic therapies, and radiation delivery have expanded the ability of oncology teams to individualize treatment based on each patient's disease characteristics and clinical circumstances. The Applicant further states that proton therapy represents one (1) component of this broader evolution in precision oncology and is increasingly recognized as an appropriate treatment option for clinically appropriate patients when supported by evidence-based clinical guidelines and physician judgement.

The Applicant believes that establishing Mississippi's first proton therapy center represents an investment in the long-term evolution of the State's oncology infrastructure rather than simply the addition of another radiation treatment option. The Applicant states because there are no existing proton therapy facilities within Mississippi, current in-state utilization of like facilities is not applicable. The Applicant states that Mississippi residents currently receiving proton therapy must obtain that service outside the state and for many patients, these distances translate into four (4) to eight (8) hours of travel each way, repeated over several weeks of daily treatment. The Applicant states patients often incur substantial additional expenses related to transportation, lodging, meals, lost wages, caregiver absences from work, childcare, and extended separation from their local support systems.

The Applicant believes that these barriers contribute to disparities in access to advanced radiation therapy and may prevent some clinically appropriate patients from receiving proton therapy altogether. The Applicant states that the proposed Center is intended to reduce those barriers by allowing Mississippi patients to receive advanced radiation treatments substantially closer to home while remaining under the care of their local physicians and oncology teams whenever clinically appropriate.

The Applicant projects that the Center will treat approximately 180 patients during Year 1 and 275 patients annually during Years 2 and 3. According to the Applicant, these projections were developed using statewide cancer incidence, anticipated radiation-therapy utilization, published compact proton therapy experience, expected referral patterns, and the capacity of a single room facility. The Applicant states the projections represent only a limited portion of the estimated statewide radiation-therapy population and support the need for an appropriately sized in-state proton therapy service.

D. The Probable Effect on Existing Facilities

Because no proton therapy facility currently operates in Mississippi, the Applicant states the proposed project will not duplicate or adversely affect an existing in-state proton therapy provider. The Applicant further states that the proposed Center is also not intended to replace existing proton radiation or other oncology services; but will be provided only to those patients meeting clinical criteria for the service, while surgery, medical oncology, imaging, pathology and other treatment will continue to be provided through patients' existing physicians and health care facilities.

E. Community Reaction to the Proposed Facility or Service.

The application contains eleven (11) (9) letters of support from the City of Flowood, physicians, senators, cancer survivors, residents who lost relatives to cancer, cancer patients, and local business.

Criterion 6 – Alternatives Considered

The Applicant states it considered not pursuing the proposed project; however, this would result in patients continuing to either forego advance radiation treatment or travel out-of-state to obtain those services. The Applicant further states that while continued out of state travel would avoid the project's capital cost, it would not address the travel and access barriers faced by Mississippi patients. The Applicant states it also considered a multiroom center which would provide greater capacity but would also require substantially more space and resources.

While the proposed project is a new construction project, the Applicant states to its knowledge there is not an available vault that could house a proton therapy system without significant construction, retrofit, and shielding modifications. The Applicant states the proposed equipment requires a specialized treatment vault and related structural, mechanical, electrical, imaging, and radiation-control infrastructure.

Criterion 7- Access to Care

A. Access to Services

The Applicant states the proposed Center is intended to serve patients throughout Mississippi, including Medicare beneficiaries, Medicaid recipients, low-income patients, racial and ethnic minorities, women, persons with disabilities, and elderly patients. The Applicant states Bridge will accept Medicare and Medicaid beneficiaries, maintain charity care and financial assistance policies, and accept referrals from licensed physicians and hospitals regardless of affiliation.

B. The Applicant's Performance in Meeting Federal Regulations

The Applicant asserts that it is not under any obligations under applicable federal regulations.

C. The Extent of Meeting Unmet Needs of Medicare and Medicaid

The Applicant affirms that it will work with all patients including Medicare, Medicaid, and medically indigent patients to ensure access to the proposed services.

D. Range of Means of Access

The Applicant states that Bridge will work with all patients to ensure they have access to the proposed services. The Applicant further states that by establishing the Center, Mississippians will have improved access to these specialized services without leaving the State. The proposed Center will be located on Medical Parkway in Flowood, Mississippi, off Airport Road and Flowood Drive. The Applicant anticipates after a ramp up period, the Center will operate Monday-Friday from 6 a.m. to 10 p.m.

Criterion 8 – Financial Feasibility

A. Comparison of Projections with Similar Facility/Services

The Applicant asserts that a direct comparison of the proposed charges and profitability to similar services in the service area or state is not applicable because no proton therapy service is currently available in Mississippi. However, for financial planning purposes, the Applicant states that Bridge used Medicare reimbursement as its baseline and then adjusted charges and revenue by payor.

B. Comparison of Projected Utilization

By using nationally recognized proton therapy indications, the ASTRO Model (Exhibit I of application), NCCN guidance, and the Willis-Knighton 10-year study (Exhibit H of application), the Applicant states Bridge believes its projections are reasonably consistent with similarly sized facilities with 180 patients projected during Year 1 and 275 patients annually during Years 2 and 3. The Applicant further states that the first year projection is reasonably consistent with published experience from a proton program, at the Willis-Knighton Cancer Center.

Based on the above sources, the Applicant states Bridge anticipates an average course length of approximately twenty-eight (28) to twenty-nine (29) treatment fractions for each patient. Bridge further states at 180 patients, the Center could provide approximately 5,040 to 5,220 treatment visits annually, or approximately twenty-one (21) visits per treatment day. At 275 patients, the

Center would provide approximately 7,700 to 7,975 visits annually, or approximately thirty-one (31) to thirty-two (32) visits per day. The Applicant states both projections remain below the estimated single-room capacity of approximately thirty-five (35) treatment visits per day, allowing more utilization if needed.

The Applicant states that the projected utilization is also reasonable in relation to statewide need as appropriately 18,000 new cancer cases are diagnosed annually in Mississippi, and an estimated fifty percent (50%) to sixty percent (60%) of cancer patients receive radiation therapy during the course of their disease.

C. Feasibility Study

The application contains a letter from White and Associates, LLC, CPA, addressing the Applicant's ability to understand the proposed financial obligation and the probable effect of the expenditure on present and future operating costs.

D. Financial Forecasts

The Applicant states that this is a new provider of services; therefore, this item is not applicable.

E. Effect of Proposed Project on Cost of Health Care

Because the proposed project is for a new service in Mississippi, the Applicant states there is not a direct comparison to existing gross revenues and expenses per patient day. The Applicant further states that the treatment is covered by Medicare and commercial payors and will also treat Medicaid patients.

Criterion 9 – Cost Containment and Efficiency

The Applicant states that the proposed project will establish Mississippi's first in-state proton therapy resource through a single-room facility sized according to utilization assumptions. According to the Applicant, the Center will provide advanced radiation treatment, preserve local physician relationships, promote continuity of care, and support statewide collaboration among hospitals, oncology practices, and physician groups.

The project is not a duplication of services as proton therapy is not currently offered in Mississippi. Rather, the Applicant states that the Center will provide an advanced radiation option for cancer patients.

The Applicant states that the proposed project is responsive to continuing advances in radiation oncology, including more precise treatment planning, increased emphasis on reducing radiation exposure to healthy tissue, evidence-

based selection of patients for proton therapy, will reduce travel burdens on patients, and improve access to quality care throughout the State of Mississippi.

The Applicant asserts that the proposed Center is therefore relevant to the foreseeable needs of Mississippi's cancer population because it establishes an in-state resource capable of offering advanced treatment services to cancer patients.

Criterion 10 – Utilization of Existing Services

The Applicant reiterates that there are no existing proton therapy services available in Mississippi. Mississippi patients who are appropriate candidates for proton therapy currently must travel outside the state for treatment, creating financial and logistical burdens, and potentially disrupting continuity with their local oncology providers.

The Applicant states that the Center will complement existing cancer programs rather than replace them. The proposed project will provide Mississippi's first proton therapy service. The Applicant states that the proposed project will also position Mississippi to participate more fully in the continued advancement of modern cancer care.

The Applicant states if the proposed project is not implemented, Mississippi residents who may benefit from or require proton therapy will continue to travel outside the state for treatment. The Applicant further states the financial, geographic, and logistical burdens associated with travel may delay or prevent access to this specialized care and may disrupt coordination with local physicians and oncology teams.

Criterion 11- Construction Projects

The Applicant acknowledges this criterion and states that all construction costs are included in the Applicant's financial spreadsheets and cost estimate (Exhibit J of the application) and site plan and schematic (Exhibit E of the application).

Criterion 12 – Medicaid Participation

The Applicant states that the proposed Center is intended to serve patients throughout Mississippi, including Medicare beneficiaries, Medicaid recipients, low-income patients, racial and ethnic minorities, women, persons with disabilities, and elderly patients. The Applicant states that Bridge will also accept Medicare and Medicaid beneficiaries, maintain charity care and financial assistance policies, and accept referrals from licensed physicians and hospitals regardless of affiliation.

In addition, the Applicant affirms that it will provide a reasonable amount of indigent care.

Criterion 13 – Charity Care and Information Reporting Obligations

The Applicant affirms it will record and maintain, at a minimum, the following information regarding charity care, care to the medically indigent, and Medicaid populations and make it available to the Department within fifteen (15) business days of request: Utilization data, including the number of indigent, Medicaid, and charity admissions, and inpatient days of care; age, race, sex, zip code, and county of origin of patient; cost and charges per patient day or per procedure, if applicable; and any other data pertaining directly or indirectly to the utilization of services by medically indigent, Medicaid, or charity patients which may be requested, including discharge diagnosis, service provided, and similar information.

The Applicant projects to provide one percent (1%) charity care for the first and second year of the project as indicated below.

Gross Patient Revenue

		Medically Indigent (%)	Charity Care (%)	Medically Indigent (\$)	Charity Care (\$)
Historical 2022	Year	NA	NA	NA	NA
Historical 2023	Year	NA	NA	NA	NA
Projected Year 1		0%	1%	\$0	\$204,930.00
Projected Year 2		0%	1%	\$0	\$313,088.00

Criterion 14 – Relationship to Existing Health Care System

The Applicant states because no proton therapy facility currently operates in Mississippi, the proposed project will not duplicate or adversely affect an existing in-state proton therapy provider. The Center is also not intended to replace existing photon radiation or other oncology services. The Applicant states that proton therapy will be provided only to those patients meeting clinical criteria for the service, while surgery, medical oncology, imaging, pathology and other treatments will continue to be provided through patients' existing physicians and health care facilities.

The Applicant states the proposed Center will include support services necessary to provide proton therapy. Including image simulation, treatment planning, medical physics, dosimetry, nursing, patient preparation and recovery, billing, and equipment maintenance. Any additional required services will be provided through qualified personnel or contractual arrangements established before operations begin. The Applicant states the Center will coordinate with patients' existing providers for surgery, medical oncology, diagnostic imaging, pathology, and supportive care.

Criterion 15 – Availability of Resources

Staffing: The Applicant states the Center will be staffed with qualified radiation oncologists and medical physicists. Dosimetrists, radiation therapists, nursing personnel, administrative and billing staff, and equipment support personnel. The Applicant states these positions are consistent with the clinical disciplines used by comparable compact proton therapy programs. The Applicant states that it will recruit these positions through word-of-mouth and traditional advertising methods.

Physicians: The Applicant states that all clinical personnel will be appropriately licensed, credentialed, and trained before beginning operations. The Applicant states Bridge intends to work with physicians and oncology providers throughout Mississippi to support their patients, multidisciplinary review and continuity of care. The Applicant also anticipates entering into agreements for janitorial and linen services near completion of the Center.

Satisfactory staffing history: The Applicant submits Bridge is a new provider and does not own or operate an existing proton therapy facility or other health care facility.

Alternative uses of resources: The Applicant submits conventional radiation therapy is already available through existing Mississippi providers and does not address the lack of in-state proton therapy. A multiroom facility would require substantially greater space, capital, and operating resources than supported by the Applicant's projected utilization. Therefore, the Applicant selected a compact, single-room proton therapy system as the most appropriate use of resources.

GR Criterion 16- Quality of Care

The Applicant states the proposed project will improve the quality of care available to Mississippi cancer patients by providing in-state access to proton therapy for clinically appropriate patients. The Applicant states proton therapy can deliver radiation more precisely to the treatment target while reducing exposure to surrounding healthy tissues and critical structures, which may reduce treatment-related toxicity. Bridge states the Center will use individualized treatment planning, medical physics review, dose verification, and appropriate quality assurance procedures. In addition, the Applicant states the project will also promote continuity of care by coordinating proton therapy with patients' existing physicians and oncology providers, while other components of cancer care continue to be provided in local communities. After the Center becomes operational, the Applicant states that it will seek accreditation, however, there is no past quality of care as this is a new provider of care.

Criterion 17 – Access by Health Professional Schools

The Applicant states as Mississippi's first proton therapy center, the proposed project will create future educational opportunities for medical residents, medical physics trainees, dosimetry and radiation therapy students, nurses, and other health professionals. Also, as the first proton therapy center in Mississippi, the Applicant states Bridge plans to serve residents across the State. In addition,

given that proton therapy centers are regional providers, it is possible that residents of other states could elect to travel to Mississippi for services.

Criterion 18 – Community Support and Community Impact

The application contains eleven (11) () letters of support from the City of Flowood, physicians, senators, cancer survivors, residents who lost relatives to cancer, cancer patients, and local business.

GR Criterion 19 – Service Availability and Continuity

Because no proton therapy facility currently operates in Mississippi, the Applicant states the proposed project will not duplicate or adversely affect an existing in-state proton therapy provider.

GR Criterion 20 – Non-Discrimination

The Applicant affirms that the services provided pursuant to this proposed project shall be offered in accordance with applicable federal and state non-discrimination requirements.

GR Criterion 21- Competing Applications

There are no competing applications on file with the Department regarding the establishment of proton therapy equipment and services.

GR Criterion 22 – Supplemental Service Specific Criteria

The Applicant asserts Bridge has demonstrated compliance with the service-specific criteria set forth in the State Health Plan.

GR Criterion 23 – Historical Compliance

Because no proton therapy facility currently operates in Mississippi, there is no history of compliance with applicable law, licensure requirements, Certificate of Need requirements, conditions of approval, reporting requirements, and other regulatory obligations.

GR Criterion 24 – Special Circumstances

The Department may consider special circumstances relevant to the proposed project, including circumstances not specifically identified elsewhere in this chapter, to the extent authorized by applicable law.

IV. FINANCIAL FEASIBILITY

A. Capital Expenditure Summary

Item	Cost	Percentage of Total
New Construction	\$ 29,607,825.00	38.00%
Renovation	0.00	0.00%
Capital Improvements	0.00	0.00%
Land Cost	1,570,000.00	2.00%
Fixed Equipment	34,500,000.00	44.00%
Non-fixed Equipment	1,100,000.00	1.00%
Fees (architectural, consultant etc.)	5,926,132.00	8.00%
Site Preparation	0.00	0.00%
Legal and Accounting Fees	0.00	0.00%
Contingency Reserve	4,240,000.00	5.00%
Capitalized Interest	1,250,000.00	2.00%
Totals	\$78,193,957.00	100.00%

The Applicant proposes to construct a 24,300 square feet facility to house Mississippi's first proton therapy Center. The cost per square foot is estimated to be \$3,107.98. The Applicant expects to obligate the capital expenditure within eight (8) months of approval and complete within approximately one (1) year but expects to file six (6) month extensions.

B. Method of Financing

The Applicant proposes to finance the project with a \$80,000,000 loan with an eight percent (8%) interest for thirty-nine (39) years. The application contains a letter from Cadence Bank, dated June 16, 2026, indicating an interest in a potential financing relationship.

The Applicant proposes to enter a thirty (30) year operating lease for the building at a twelve percent (12%) interest rate and annual cost of \$194,906. In addition, the Applicant proposes to enter into a twelve (12) year operating lease for the equipment at nine percent (9%) interest rate at a cost of \$4,971,563 annually.

C. Effect on Operating Costs

The Hospital's three-year projected operating statement is presented in Attachment 1.

D. Cost to Medicaid/Medicare

The applicant projects the cost to third-party payors as follows (With Project):

Payor Mix	Utilization Percentage (%)	First-Year Revenue (\$)
Medicare	55%	\$22,542,300.00
Medicaid	8%	3,278,880.00
Commercial	35%	14,345,100.00
Self-Pay	1%	204,930.00
Charity Care	1%	204,930.00
Other	1%	409,860.00
Total	100%	\$40,986,000.00

V. RECOMMENDATION OF OTHER AFFECTED AGENCIES

The Division of Medicaid (“DOM”) was provided a copy of this application for review and comment. The DOM had not commented on the project as of September 28, 2026.

VI. CONCLUSION AND RECOMMENDATION

The proposed project complies with the policy statements, and the criteria and standards for Acquisition or Otherwise Control of Proton Therapy Equipment and/or Offering of Proton Therapy Services as contained in the *FY 2022 Mississippi State Health Plan, Fourth Edition*. In addition, the proposed project is consistent with Chapter 7 of the *Mississippi Certificate of Need Review Manual, Revised August 2026*; 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 Bridge Proton Therapy LLC for the Establishment of a Proton Therapy Center, Acquisition of Proton Therapy Equipment and Provision of Proton Therapy Services.

Attachment 1

Bridge Proton Therapy LLC Three-Year Operating Statement (Project Only)			
	Year 1	Year 2	Year 3
Revenue			
Patient Revenue:			
Inpatient	\$0.00	\$0.00	\$0.00
Outpatient	\$ 40,986,000.00	\$62,617,501.00	\$ 62,617,501.00
Gross Patient Revenue	\$40,986,000.00	\$62,617,501.00	\$ 62,617,501.00
Charity Care	\$204,930.00	\$313,088.00	\$ 313,088.00
Deductions from Revenue	\$ 30,124,710.00	\$46,023,863.00	\$46,023,863.00
Net Patient Revenue	\$10,656,360.00	\$16,280,550.00	\$ 16,280,550.00
Other Operating Revenue	0.00	.00	0.00
Total Operating Revenue	\$10,656,360.00	\$16,280,550.00	\$ 16,280,550.00
Expenses			
Operating Expenses:			
Salaries	\$ 3,485,254.00	\$3,659,516.00	\$ 3,842,492.00
Benefits	1,003,087.00	1,053,242.00	1,105,904.00
Supplies	150,000.00	157,500.00	163,375.00
Services	2,100,000.00	3,400,000.00	3,400,000.00
Lease	5,166,469.00	5,166,469.00	5,166,469.00
Depreciation	1,271,896.00	1,271,896.00	1,271,896.00
Interest	0.00	0.00	0.00
Other	0.00	0.00	0.00
Total Expenses	\$13,176,706.00	\$14,708,623.00	\$ 14,950,136.00
Net Income (Loss)	\$ (2,520,346.00)	\$ 1,571,927.00	\$ 1,330,414.00
Assumptions			
Inpatient days	0	0	0
Outpatient days	0	0	0
Procedures	5,100	7,800	7,800
Charge/outpatient day	\$ 0.00	\$ 0.00	\$ 0.00
Charge per inpatient day	\$ 0.00	\$ 0.00	\$ 0.00
Charge per procedure	\$ 8,036.00	\$ 8,028.00	\$ 8,028.00
Cost per inpatient day	\$ 0.00	\$ 0.00	\$ 0.00
Cost per outpatient day	\$ 0.00	\$ 0.00	\$ 0.00
Cost per procedure	\$ 2,584.00	\$ 1,886.00	\$ 1,917.00

Note: All totals may not be equal to Applicant's due to rounding.