



August 12, 2015

North Carolina Division of Health Service Regulation
Healthcare Planning and Certificate of Need Section
North Carolina State Health Coordinating Council
2704 Mail Service Center
Raleigh, NC 27699-2704

Dear Dr. Ullrich and Members of the Council:

The North Carolina Proposed 2017 State Medical Facilities Plan includes Policy TE-3, *Plan Exemption for Fixed Magnetic Resonance Imaging Scanners*. This policy will enable qualified applicants that provide emergency care coverage on a 24/7 basis, and that have the capability and volume to support a fixed MRI scanner, to apply for a Certificate of Need to provide the service.

As drafted in the Proposed SMFP, however, the policy may not be used in a county where a fixed MRI has already been approved. We believe there may be instances where fixed MRI equipment is needed, regardless of whether other fixed equipment exists within the service area, and would therefore recommend that the limitation be stricken.

North Carolina hospitals function as part of the community safety net, and may be the only source of healthcare for some. Having a hospital at the ready to respond to disasters and address the needs of ailing citizens is as essential as good roads and favorable taxes. Hospitals must maintain trained personnel, specialized equipment and supplies to prepare for any emergency, no matter how small or large.

And while other clinics and health centers may also be part of that safety net, access to emergency and specialty clinicians, as well as higher-level diagnostic and therapeutic equipment and services, may be available only in the hospital setting. Policy TE-3 will enable those providers a pathway to acquire the equipment they need to serve the emergency needs of their communities. NCHA supports Policy TE-3.

Please let me know if you have any questions, and thank you for your consideration.

Sincerely,

Mike Vicario,
NCHA Vice President of Regulatory Affairs



Policy TE-3: Plan Exemption for Fixed Magnetic Resonance Imaging Scanners

Qualified applicants may apply for a fixed magnetic resonance imaging scanner (MRI).

To qualify, the health service facility proposing to acquire the fixed MRI scanner shall demonstrate in its certificate of need application that it is a licensed North Carolina acute care hospital with emergency care coverage 24 hours a day, seven days a week and is located in a county that does not currently have an existing or approved fixed MRI scanner as reflected in the inventory in the applicable State Medical Facilities Plan.

The applicant shall demonstrate that the proposed fixed MRI scanner will perform at least 900 weighted MRI procedures during the third full operating year.

The performance standards in 10A NCAC 14C .2703 would not be applicable.

The fixed MRI scanner must be located on the hospital's "main campus" as defined in 131E-176-(14n)a.