

From: [Carmen Geerlings](#)
To: [Bridget Wight](#); [DHSR.SMFP.Petitions-Comments](#)
Cc: [Jason Harris](#); [Jessica Bordeaux](#); [John Bardini](#); [Dana Heuser](#)
Subject: [External] RE: Oral Remarks – Carmen Geerlings | July 17 Public Hearing on Proposed 2026 SMFP
Date: Thursday, July 17, 2025 12:53:15 PM
Attachments: [image003.png](#)

You don't often get email from carmen.geerlings@raleighrad.com. [Learn why this is important](#)

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Good afternoon,

Please accept this revision for our remarks:

Raleigh Radiology is requesting that the State Health Coordinating Council (SHCC) modifies the Proposed *2026 State Medical Facilities Plan (2026 SMFP)* to include a **special need for one additional fixed MRI scanner in Wake County**. This adjustment would apply to Chapter 15 of the SMFP, and eligibility would be restricted to applicants who provided fixed MRI services in 2024 through legacy CON service agreements that were terminated effective 2025 and would be assigned to the first CON batch in January 2026.

Today is our third time speaking with the SHCC, and some of you may have already heard this request. With our previous statements, we have heard your questions and considered additional options. Given that, we would also like to propose the Council to consider a geographic specific policy as an alternative solution to this unique situation.

Let me begin by providing some historical and operational context for this request:

- Raleigh Radiology currently offers MRI services at 9 of our locations. At this time, Akumin operates 6 of those MRIs. Two of the 6 MRIs are fixed within the Raleigh Radiology facility where they are operated, while the other 4 are mobile units. One of the fixed MRI units is located at Raleigh Radiology Blue Ridge in Raleigh. Akumin owns both the magnets and the CON to operate MRI at all 6 locations, and Raleigh Radiology cannot offer MRI services at those locations without this partnership.
- In early 2025, Akumin withdrew 9 days per week of mobile service across several Raleigh Radiology locations, totaling 90 hours of patient access to MRI per week. With short notice, we were able to reschedule patients to our other locations in the area, including those outside of Wake County, and although this certainly did impact our operations, we adjusted quickly. Absorbing patient demand among the remaining operational hours available at Raleigh Radiology has stretched our capacity to its maximum.
- We have since received notification that Akumin will terminate MRI services at our Raleigh Radiology Blue Ridge location effective November of this year. Because Akumin owns the CON and MRI equipment, the existing fixed unit in the building will be

decommissioned or relocated in order for Akumin to use their CON elsewhere. If nothing changes, Raleigh Radiology Blue Ridge will no longer be an option for patients needing MRI services. At this time, we believe Akumin intends to use their legacy CON to operate outside of Wake county, meaning that our community will have even fewer options for MRI. The nearly 8,000 patients we anticipate serving annually at this location will be left to find alternative options in an area where the SHCC has already determined more capacity is needed.

Now that you have that context, allow me a moment to explain why this request is so crucial.

- MRI plays a vital role as a diagnostic imaging tool for clinicians. It is ideal for the brain, spinal cord, muscles, joints, and other internal organs such as the liver and kidneys. MRI is sensitive to small changes in soft tissues, making it valuable for early diagnosis of certain diseases. Nearly 950 referring providers have sent patients to the Raleigh Radiology Blue Ridge location for an MRI scan this year. These providers trust our expert radiologists, who are readily available to answer questions and consult on the best next steps for patient care. If we are unable to offer MRI services at our Blue Ridge location, patients will be forced to find alternative options which may unnecessarily delay their care plan, leading to potential negative health outcomes for thousands of patients.
- When the Agency developed the 2026 SMFP, the assumption was that all the “fixed” magnets in Wake County would remain operational. Now that you have the knowledge that one of the most highly utilized MRI units in Wake county will no longer be operational in 2026, it is clear to see that the single MRI allocated in the SMFP is not sufficient to ensure proper patient care. Additionally, the batch for the 2026 MRI in Wake county is competitive and does not open until July, which means a decision will likely not be announced until November 2026. This will be too late to make an impact for affected patients. Furthermore, beginning November 21, 2026, a CON to own an MRI in Wake County will no longer be required, as CON review for new MRI equipment in urban counties is eliminated. These coinciding events create a unique situation that is an unintended consequence of the legislation that removes the need for CON for MRIs in counties with more than 125,000 residents. But whether through the competitive CON process or waiting until CON is no longer required, the residents of Wake county would be left without adequate access to this service for no less than year, but likely longer given construction and installation times.
- Given these unique conditions, we implore the SHCC to see this crucial need and consider either modifying the Proposed 2026 SMFP to include a special need for one additional fixed MRI scanner in Wake County and assign it to the first batch in January of 2026, or to include a geographic specific policy in the plan in order to bridge the gap in service for Wake County residents that this situation will create.

Thank you for your time and attention, I will now answer any of your questions.

Best regards,

Carmen Geerlings, MBA, RT-R, CRA, CPCO, DTM

Associate Director Compliance and Regulatory Affairs

Corporate Compliance Officer

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11 Locations in the Triange: Blue Ridge, Cary, Chapel Hill, Clayton, Fuquay-Varina, Holly Springs, Knightdale, Midtown, Oberlin, RR South, Wake Forest

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UPCOMING PTO/OUT OF OFFICE:

June 12-20, 2025

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From: Bridget Wight <bridget.wight@raleighrad.com>

Sent: Thursday, July 17, 2025 9:56 AM

To: DHSR.SMFP.Petitions-Comments <dhsr.smfp.petitions-comments@dhhs.nc.gov>

Cc: Jason Harris <jason.harris@raleighrad.com>; Jessica Bordeaux

<jessica.bordeaux@raleighrad.com>; John Bardini <john.bardini@raleighrad.com>; Carmen

Geerlings <carmen.geerlings@raleighrad.com>; Dana Heuser <dana.heuser@raleighrad.com>

Subject: RE: Oral Remarks – Carmen Geerlings | July 17 Public Hearing on Proposed 2026 SMFP

Hello,

Please see the revised remarks below.

Raleigh Radiology is requesting that the State Health Coordinating Council (SHCC)

modifies the Proposed 2026 *State Medical Facilities Plan (2026 SMFP)* to include a **special need for one additional fixed MRI scanner in Wake County**. This adjustment would apply to Chapter 15 of the SMFP, and eligibility would be restricted to applicants who provided

fixed MRI services in 2024 through legacy service agreements that were terminated effective 2025 and would be assigned to the first CON batch in January 2026.

Today is our third time speaking with the SHCC, and some of you may have already heard this request. With our previous statements, we have heard your questions and considered additional options. Given that, we would also like to propose the Council to consider a policy as an alternative solution to this unique situation.

Let me begin by providing some historical and operational context for this request:

- Raleigh Radiology currently offers MRI services at 9 of our locations. At this time, Akumin operates 6 of those MRIs. Two of the 6 MRIs are fixed within the Raleigh Radiology facility where they are operated, while the other 4 are mobile units. One of the fixed MRI units is located at Raleigh Radiology Blue Ridge in Raleigh. Akumin owns both the magnets and the CON to operate MRI at all 6 locations, and Raleigh Radiology cannot offer MRI services at those locations without this partnership.
- In early 2025, Akumin withdrew 9 days per week of mobile service across several Raleigh Radiology locations, totaling 90 hours of patient access to MRI per week. With short notice, we were able to reschedule patients to our other locations in the area, including those outside of Wake County, and although this certainly did impact our operations, we adjusted quickly. Absorbing patient demand among the remaining operational hours available at Raleigh Radiology has stretched our capacity to its maximum.
- We have since received notification that Akumin will terminate MRI services at our Raleigh Radiology Blue Ridge location effective November of this year. Because Akumin owns the CON and MRI equipment, the existing fixed unit in the building will be decommissioned or relocated in order for Akumin to use their CON elsewhere. If nothing changes, Raleigh Radiology Blue Ridge will no longer be an option for patients needing MRI services. At this time, we believe Akumin intends to use their legacy CON to operate outside of Wake county, meaning that our community will have even fewer options for MRI. The nearly 8,000 patients we anticipate serving annually at this location will be left to find alternative options in an area where the SHCC has already determined more capacity is needed.

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- When the Agency developed the 2026 SMFP, the assumption was that all the “fixed” magnets in Wake County would remain operational. Now that you have the knowledge that a highly utilized MRI unit will no longer be operational in 2026, the single MRI allocated in the SMFP is not sufficient to ensure proper patient care in Wake County. Additionally, the batch for the 2026 MRI in Wake county does not open until July, which will be too late to make an impact for affected patients. The current available CON in the 2026 SMFP is part of a competitive batch and the outcome would likely not be announced until November 2026. Additionally, beginning November 21, 2026, a CON to own an MRI in Wake County will no longer be required, as CON review for new MRI equipment in counties with a population greater than 125,000 residents will be eliminated. With either of these options, the residents of Wake County would be left without adequate access to this service for no less than year, but likely longer given construction and installation times.
- Given these unique conditions, we implore the SHCC to see this crucial need and consider either modifying the Proposed 2026 SMFP to include a special need for one additional fixed MRI scanner in Wake County and assign it to the first batch in January of 2026, or to include a policy in the plan in order to bridge the gap in service for Wake County residents that this situation will create.
- Thank you for your time and attention, I will now answer any of your questions.

Best,
Bridget

Bridget Wight

Executive Assistant

bridget.wight@raleighrad.com

Direct: 315-323-5649

5220 Greens Dairy Road
Raleigh, NC 27616



11 Imaging Centers in the Triangle: Blue Ridge, Cary, Chapel Hill, Clayton, Fuquay-Varina, Holly Springs, Knightdale, Midtown, Oberlin, RR South, Wake Forest

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From: Bridget Wight
Sent: Thursday, July 17, 2025 9:19 AM
To: DHSR.SMFP.Petitions-Comments <dhsr.smfp.petitions-comments@dhhs.nc.gov>
Cc: Jason Harris <jason.harris@raleighrad.com>; Jessica Bordeaux <jessica.bordeaux@raleighrad.com>; John Bardini <john.bardini@raleighrad.com>; Carmen Geerlings <carmen.geerlings@raleighrad.com>; Dana Heuser <dana.heuser@raleighrad.com>
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Let me begin by providing some historical and operational context for this request:

- Raleigh Radiology currently offers MRI services at 9 of our locations. At this time, Akumin operates 6 of those MRIs. Two of the 6 MRIs are fixed within the Raleigh Radiology facility where they are operated, while the other 4 are mobile units. One of the fixed MRI units is located at Raleigh Radiology Blue Ridge in Raleigh. Akumin owns both the magnets and the CON to operate MRI at all 6 locations, and Raleigh Radiology cannot offer MRI services at those locations without this partnership.
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Bridget Wight

Executive Assistant

bridget.wight@raleighrad.com

Direct: 315-323-5649

Raleigh Radiology – Business Support Office

5220 Greens Dairy Road

Raleigh, NC 27616



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