



NC DEPARTMENT OF  
**HEALTH AND  
HUMAN SERVICES**

JOSH STEIN • Governor

DEVPUTTA SANGVAI • Secretary

MARK PAYNE • Director, Division of Health Service Regulation

VIA EMAIL ONLY

February 20, 2025

Tina Hinshaw

[Tina.hinshaw@akumin.com](mailto:Tina.hinshaw@akumin.com)

**Exempt from Review – Replacement Equipment**

**Record #:** 4708

Date of Request: January 31, 2025

Business Name: Alliance Healthcare Services, Inc.

Business #: 60

Project Description: Temporarily replace mobile PET Scanner PETCT 171

County: Wake

Dear Ms. Hinshaw:

The Healthcare Planning and Certificate of Need Section, Division of Health Service Regulation (Agency), determined that the above referenced project is exempt from certificate of need review in accordance with G.S. 131E-184(a)(7). Therefore, you may proceed to acquire without a certificate of need the mobile PETCT scanner PETCT 239 Serial #10262 to temporarily replace the mobile PETCT scanner PETCT 171, Serial #1S9SC4826F5834422. This determination is based on your representations that the mobile PETCT scanner PETCT171 will undergo repairs, after which, upon completion of the repairs, PETCT171 will return to service and PETCT 239 will be removed from the State and will not be used again in the State without first obtaining a certificate of need if one is required.

It should be noted that the Agency's position is based solely on the facts represented by you and that any change in facts as represented would require further consideration by this office and a separate determination. If you have any questions concerning this matter, please feel free to contact this office.

Sincerely,

Gregory F. Yakaboski  
Project Analyst

Micheala Mitchell  
Chief

cc: Radiation Protection Section, DHSR

NC DEPARTMENT OF HEALTH AND HUMAN SERVICES • DIVISION OF HEALTH SERVICE REGULATION  
HEALTHCARE PLANNING AND CERTIFICATE OF NEED SECTION

LOCATION: 809 Ruggles Drive, Edgerton Building, Raleigh, NC 27603  
MAILING ADDRESS: 809 Ruggles Drive, 2704 Mail Service Center, Raleigh, NC 27699-2704  
<https://info.ncdhhs.gov/dhsr/> • TEL: 919-855-3873

AN EQUAL OPPORTUNITY / AFFIRMATIVE ACTION EMPLOYER



January, 31, 2025 \*\*Updated 2/11/2025\*\*

Mr. Mike McKillip, CON Analyst  
Mr. Greg Yakaboski, CON Analyst  
Ms. Micheala Mitchell, Chief  
Health Planning and Certificate of Need Section  
2704 Mail Service Center  
Raleigh, NC 27699-2704

Business Name: Alliance Health Services  
Business Number: 60  
PETCT171 Serial # 1S9SC4826F5834422  
PETCT239 Serial # 10262

RE: Alliance Healthcare Services (aka Akumin) - Written Notice for Exemption from CON Review for the **Temporary Replacement of PETCT171**

Dear Mr. McKillip, Mr. Yakaborski, and Ms. Mitchell:

I am writing regarding the need to temporarily replace PETCT scanner PETCT171 such that maintenance and repairs can be completed. Please accept this notice of exemption to temporarily replace PETCT171 with PETCT239, which is an existing mobile PETCT scanner owned by Akumin and will be utilized as the interim temporary PETCT for this scanner. **When PETCT239 is no longer needed to serve as a temporary replacement for PETCT171, it will be removed from North Carolina. The Agency should note that the original temporary replacement unit, PETCT130, has been removed from the state and replaced by PETCT239. The repairs on PETCT171 are taking longer than originally expected and thus this request.**

The legacy Akumin PETCT PETCT171 is a scanner that has properly been reported in the 2024 NC MRI Equipment Inventory and serves nine mobile sites.

This letter provides justification and written notice regarding the replacement equipment in accordance with NCGS 131 E-184. Akumin also provides documentation that the equipment conforms to the Certificate of Need Laws and Administrative rules: GS 131E-184(a) (7) Exemptions from review to provide replacement equipment 10A NCAC 14C.0303 Replacement Equipment Administrative Rules. Overview

This existing PETCT Scanner requires temporary replacement due to:

- Maintenance and repairs of the trailer which houses PETCT171. Repairs are ongoing, taking longer than originally anticipated, and are to be completed in roughly an additional 6 weeks.

Compliance Documentation

Compliance with G.S. 131E-176 (22a) Replacement Equipment Definition is evident because the temporary replacement scanner has a fair market value of \$1,300,000 which is less than the \$2,000,000 threshold. The replacement PETCT equipment will be used for the same diagnostic



purposes as the existing equipment. In addition, Akumin is providing written notice to the Department in accordance with G.S. 131E-184 (a) (7) Exemption from Review to provide replacement equipment.

Applicability and Conformance with Administrative Rule 10A NCAC 14C.0303 Replacement Equipment Akumin plans to use an existing mobile PETCT as a temporary replacement. No equipment will be purchased. The temporary replacement equipment conforms to the rules as follows: 10A NCAC 14C .0303 REPLACEMENT EQUIPMENT (a) This Rule defines the terms used in the definition of "replacement equipment" set forth in G.S. 131E-176(22a).

Akumin has reviewed this rule definition.

(b) "Currently in use" means that the equipment to be replaced has been used by the person requesting the exemption at least 10 times to provide a health service during the 12 months prior to the date the written notice required by G.S. 131E-184(a) is submitted to the CON Section.

Akumin confirms that PETCT 171 meets the definition of "currently in use" because the MRI scanner provides service during the previous 12 months prior to the date of this written notice.

(c) Replacement equipment is not "comparable" if: (1) the replacement equipment to be acquired is capable of providing a health service that the equipment to be replaced cannot provide; or (2) the equipment to be replaced was acquired less than 12 months prior to the date the written notice required by G.S. 131E-184(a) is submitted to the CON Section and it was refurbished or reconditioned when it was acquired by the person requesting the exemption.

The replacement PETCT scanner is comparable to the equipment being replaced because the temporary replacement equipment will be used to acquire the same types of PETCT images and data. Akumin certifies that the replacement mobile PETCT equipment will be used for the same diagnostic purposes as the existing PETCT unit.

The existing equipment, PETCT171, will be temporarily replaced by PETCT239, which will be removed from North Carolina once repairs to PETCT171 are completed. The temporary use of replacement PETCT239 will be discontinued in approximately six weeks (March 2025) when the repair of PETCT171 has been completed and returned to service.

Thank you for your review and consideration of this information. Please call me at 805.325.3078 if you have any questions.

Sincerely,

Tina Hair Hinshaw, MBA  
RVP, Mobile Operations Southeast Region  
805.325.3078  
[tina.hinshaw@akumin.com](mailto:tina.hinshaw@akumin.com)

CC: Rodney Skelding, Manager of Operations, Akumin



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Mr. Mike McKillip, CON Analyst  
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Akumin confirms that PETCT 171 meets the definition of “currently in use” because the MRI scanner provides service during the previous 12 months prior to the date of this written notice.

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The replacement PETCT scanner is comparable to the equipment being replaced because the temporary replacement equipment will be used to acquire the same types of PETCT images and data. Akumin certifies that the replacement mobile PETCT equipment will be used for the same diagnostic purposes as the existing PETCT unit.

The existing equipment, PETCT171, will be temporarily replaced by PETCT239, which will be removed from North Carolina once repairs to PETCT171 are completed. The temporary use of replacement PETCT239 will be discontinued in approximately six weeks (March 2025) when the repair of PETCT171 has been completed and returned to service.

Thank you for your review and consideration of this information. Please call me at 805.325.3078 if you have any questions.

Sincerely,

Tina Hair Hinshaw, MBA  
RVP, Mobile Operations Southeast Region  
805.325.3078  
[tina.hinshaw@akumin.com](mailto:tina.hinshaw@akumin.com)

CC: Rodney Skelding, Manager of Operations, Akumin

**From:** [Mckillip, Mike](#)  
**To:** [Stancil, Tiffany C](#)  
**Cc:** [Mitchell, Micheala L](#); [Yakaboski, Greg](#)  
**Subject:** FW: [External] UPDATED: PETCT Temp Replacement of PETCT 171  
**Date:** Tuesday, February 11, 2025 1:31:06 PM  
**Attachments:** [AR\\_NCCON\\_PETCT239\\_Temp\\_Coverage\\_for\\_PETCT171\\_01312025.pdf](#)

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Hi Tiffany,

This is a request for a corrected replacement equipment exemption letter. Tina identified the wrong equipment in the first request. Looks like Greg did the last one, so we will ask him to do a new one with the correct equipment identified. Thanks.

**Michael Mckillip**

Team Leader, Certificate of Need  
Division of Health Service Regulation, Healthcare Planning and Certificate of Need  
[NC Department of Health and Human Services](#)

Office: 919-855-3877 (I am in the office on Wednesday and Friday, and can best be reached by email on Monday, Tuesday and Thursday.)  
[mike.mckillip@dhhs.nc.gov](mailto:mike.mckillip@dhhs.nc.gov)

809 Ruggles Drive, Edgerton  
2704 Mail Service Center  
Raleigh, NC 27699

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**From:** Tina Hinshaw <tina.hinshaw@akumin.com>  
**Sent:** Tuesday, February 11, 2025 10:25 AM  
**To:** Mckillip, Mike <mike.mckillip@dhhs.nc.gov>; Mitchell, Micheala L <Micheala.Mitchell@dhhs.nc.gov>; Yakaboski, Greg <greg.yakaboski@dhhs.nc.gov>

**Cc:** Rodney Skelding <rodney.skelding@akumin.com>; Tina Hinshaw <tina.hinshaw@akumin.com>  
**Subject:** [External] UPDATED: PETCT Temp Replacement of PETCT 171

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Greg, Mike, and Micheala,  
I apologize but found an error in my original email and letter. The correct temporary replacement asset # is PETCT239. I have spoken with Greg and have updated the letter to include this correction and clarity on the company name and company number.

It is a pleasure working with you all and THANK YOU, Greg, for the call.  
Tina

**Tina Hinshaw**  
Vice President, Regional

[+1 805-325-3078](tel:+18053253078)

[tina.hinshaw@akumin.com](mailto:tina.hinshaw@akumin.com)

[akumin.com](http://akumin.com)

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On Fri, Jan 31, 2025 at 2:00 PM Tina Hinshaw <[tina.hinshaw@akumin.com](mailto:tina.hinshaw@akumin.com)> wrote:

Mike and Micheala,  
Repairs on PETCT171 are taking longer than anticipated. We have removed the temp coverage unit PETCT130 from NC and replaced it with PETCT229. Therefore, a temp replacement letter is attached for PETCT171 being replaced by PETCT229.

Let me know if you have any questions. The bottom line is...we are able to continue taking care of the citizens of NC with a great service and asset.

Have a nice day.  
Tina







January, 31, 2025

Mr. Mike McKillip, CON Analyst  
Ms. Micheala Mitchell, Chief  
Health Planning and Certificate of Need Section  
2704 Mail Service Center  
Raleigh, NC 27699-2704

RE: Akumin - Written Notice for Exemption from CON Review for the Temporary Replacement of PETCT171

Dear Mr. McKillip and Ms. Mitchell:

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The legacy Akumin PETCT PETCT171 is a scanner that has properly been reported in the 2024 NC MRI Equipment Inventory and serves:

- Albemarle Hospital
- Carteret General
- Columbus Regional Healthcare
- Lenior Memorial
- Onslow
- Outer Banks Hospital
- Scotland Memorial Hospital
- Wilson Medical
- Vidant Roanoke-Chowan

This letter provides justification and written notice regarding the replacement equipment in accordance with NCGS 131 E-184. Akumin also provides documentation that the equipment conforms to the Certificate of Need Laws and Administrative rules: GS 131E-184(a) (7) Exemptions from review to provide replacement equipment 10A NCAC 14C.0303 Replacement Equipment Administrative Rules.

#### Overview

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Akumin confirms that PETCT 171 meets the definition of “currently in use” because the MRI scanner provides service during the previous 12 months prior to the date of this written notice.

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The existing equipment, PETCT171, will be temporarily replaced by PETCT229, which will be removed from North Carolina once repairs to PETCT171 are completed. The temporary use of replacement PETCT229 will be discontinued in approximately six weeks (March 2025) when the repair of PETCT171 has been completed and returned to service.

Thank you for your review and consideration of this information. Please call me at 805.325.3078 if you have any questions.

Sincerely,

Tina Hair Hinshaw, MBA  
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CC: Rodney Skelding, Manager of Operations, Akumin

**From:** [Mckillip, Mike](#)  
**To:** [Stancil, Tiffany C](#)  
**Cc:** [Mitchell, Micheala L](#)  
**Subject:** FW: [External] PETCT Temp Replacement of PETCT 171  
**Date:** Friday, January 31, 2025 2:06:33 PM  
**Attachments:** [AR\\_NCCON\\_PETCT229\\_Temp\\_Coverage\\_for\\_PETCT171\\_01312025.pdf](#)

---

Hi Tiffany,

This replacement equipment exemption letter request can go to Greg. Thanks.

**Michael McKillip**

Team Leader, Certificate of Need

Division of Health Service Regulation, Healthcare Planning and Certificate of Need  
[NC Department of Health and Human Services](#)

Office: 919-855-3877 (I am in the office on Wednesday and Friday, and can best be reached by email on Monday, Tuesday and Thursday.)

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**From:** Tina Hinshaw <tina.hinshaw@akumin.com>  
**Sent:** Friday, January 31, 2025 2:00 PM  
**To:** Mckillip, Mike <mike.mckillip@dhhs.nc.gov>; Mitchell, Micheala L <Micheala.Mitchell@dhhs.nc.gov>  
**Cc:** Rodney Skelding <rodney.skelding@akumin.com>; Tina Hinshaw <tina.hinshaw@akumin.com>  
**Subject:** [External] PETCT Temp Replacement of PETCT 171

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**Tina Hinshaw**  
Vice President, Regional

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