



NC DEPARTMENT OF
**HEALTH AND
HUMAN SERVICES**

JOSH STEIN • Governor

DEV DUTTA SANGVAI • Secretary

MARK PAYNE • Director, Division of Health Service Regulation

VIA EMAIL ONLY

September 12, 2025

Tina Hinshaw

Tina.hinshaw@akumin.com

Exempt from Review – Replacement Equipment

Record #: 4907

Date of Request: August 25, 2025

Business Name: Alliance Healthcare Service, Inc.

Business #: 60

Project Description: Temporary replacement of mobile MRI scanner

County: Brunswick, Pender and Wake

Dear Tina 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 temporarily use without a certificate of need the ESP23 Siemens Espree mobile MRI scanner to replace the ESP37 Siemens Espree mobile MRI scanner while that unit undergoes repairs. This determination is based on your representations that the existing unit will be sold or otherwise disposed of 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,

Crystal Kearney
Project Analyst

Micheala Mitchell
Chief

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



8300 W. Sunrise Blvd
Plantation, FL 33322

August 25, 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
ESP37 Serial # 1M9A3A820BH022802 Siemens Espree
ESP23 Serial # 1S9FA482181183250 Siemens Espree

RE: Alliance Healthcare Services (aka Akumin) - Written Notice for Exemption from CON Review for the
Temporary Replacement of ESP37

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

I am writing regarding the need to temporarily replace MRI scanner ESP37 such that maintenance and repairs can be completed. Please accept this notice of exemption to temporarily replace ESP37 with ESP23, which is an existing mobile MRI scanner owned by Akumin and will be utilized as the interim temporary MRI for this scanner. When ESP23 is no longer needed to serve as a temporary replacement for ESP37, it will be removed from North Carolina.

The legacy Akumin MRI ESP37 is a scanner that has properly been reported in the 2024 NC MRI Equipment Inventory and serves five mobile sites.

Raleigh Medical Park
23 Sunnybrook Road
Raleigh, NC 27610

Raleigh Radiology Holly Springs
1060 S Main Street
Holly Springs, NC 27540

Southern Imaging Services
8300 Health Park
Raleigh, NC 27615

New Hanover Regional
1333 South Dickinson Dr
Leland, NC 28451

Pender Memorial
507 East Fremont St
Burgaw, NC 28425



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.

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 ESP37 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 MRI scanner is comparable to the equipment being replaced because the temporary replacement equipment will be used to acquire the same types of MRI images and data. Akumin certifies that the replacement mobile MRI equipment will be used for the same diagnostic purposes as the existing MRI unit.

The existing equipment, ESP37, will be temporarily replaced by ESP23, which will be removed from North Carolina once repairs to ESP37 are completed. The temporary use of replacement ESP23 will be discontinued in approximately four weeks (September 2025) when the repair of ESP37 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

CC: Rodney Skelding, Manager of Operations, Akumin