



NOVANT HEALTH COMMENTS ON CONE HEALTH'S PETITION & WAKEMED'S PETITION REGARDING LINEAR ACCELERATOR POLICY

COMMENTER:

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Novant Health appreciates the opportunity to comment on the recently filed petitions by Cone Health and WakeMed filed in the development of the 2026 State Medical Facilities Plan ("SMFP") regarding the establishment of new policies to acquire linear accelerators ("linacs") through plan exemptions. North Carolina has chosen a very specific health planning process for many services, including linacs, and that planning process should not be disturbed without a real need to do so. Neither petition establishes the need to do so.

Though each petition is different, both petitions contend that the SMFP's standard need methodology does not appropriately address the need for linacs for the reasons outlined in their respective petitions. Both petitions noted that there have been previous spring and summer petitions in the past with varying success in obtaining a special need determination for a linac. A plan exemption specific to linacs has not been approved by the SHCC thus far, and Novant Health submits there is no reason for the SHCC to do so now.

On February 18, 2025, the Healthcare Planning Section convened a Linear Accelerator Interested Parties Meeting to discuss Proposed Policy TE-4: Plan Exemption for Linear Accelerators and the Agency recommendation. This proposed policy evolved from previous petitions made by First Health and WakeMed. Many providers, including Novant Health, commented that the proposed policy needed more review and analysis to assess the impact to the linac inventory. In general, commenters supported the standard methodology regarding linac need determination. However, the methodology could benefit from a review and an update which could address the petitioners' concerns. To accomplish this, commenters proposed that the State Health Coordinating Council ("SHCC") establish a linac workgroup that would review in detail the standard methodology and provide recommendations for revision. The final Agency recommendation based on the Interested Parties Meeting has not been made at this time.

As for the current linac petitions, both exemptions cannot be approved. Neither indicates fully what the impact will be on the linac inventory or whether there may be any unintended

consequences. We ask that the SHCC not approve the petitions put forth by Cone Health and WakeMed. Exemptions such as those proposed by Cone Health and WakeMed should be sparingly approved. If Cone Health and WakeMed believe additional linear accelerators are needed in their service areas and the standard methodology shows no such need, Cone Health and WakeMed should file summer petitions justifying a special need determination for a linac in their specific linac service areas.

We support continuing with the standard methodology and request that the SHCC consider a workgroup process to review and update the linear accelerator need methodology for future SMFPs.

Thank you for consideration of our comments.