



NOVANT HEALTH COMMENTS ON MISSION HEALTH'S PETITION REGARDING A POLICY FOR A DEDICATED CARDIAC PET FOR OPEN HEART SURGERY PROVIDERS

COMMENTER:

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Novant Health appreciates the opportunity to comment on the recent petition filed in the development of the 2026 State Medical Facilities Plan ("SMFP") by Mission Health regarding the establishment of a new policy for Open Heart Surgery providers to acquire a dedicated fixed cardiac PET scanner. This petition is another variation of Mission Health's attempt to gain a single purpose, dedicated fixed cardiac PET scanner in HSA I.

Last year, Mission Health submitted a summer petition for an Adjustment to the Need Determination to convert a fixed PET Need Determination to a Dedicated Cardiac fixed PET Need Determination in HSA I. Novant Health and others provided comments against this petition and the petition was subsequently denied by the Agency since Mission Health did not identify special characteristics of HSA I that warranted a special purpose, cardiac-only PET scanner. Instead, the SHCC placed a need determination in the 2025 SMFP in HSA I for a general use PET scanner with a filing date on August 15th.

This time Mission Health proposes a policy that any Open Heart Surgery Provider meeting certain requirements may acquire a dedicated cardiac PET scanner irrespective of the Standard Need Methodology. A Certificate of Need ("CON") application would be required, but the applicant would not have to meet the performance standards. Last year's PET petition by Mission Health was a blatant attempt to limit competition in HSA I. This proposed policy is an attempt to appear competitively benign by expanding it to all Open Heart Surgery Providers in North Carolina. But no other open heart surgery provider seems to think such a policy is necessary, as existing PET scanners can be, and are, used for cardiac imaging. There is no reason why Mission Health cannot apply for the PET scanner available in 2025 for HSA I and, if approved, use that scanner for cardiac imaging if desired.

The proposed policy is unnecessary. Many providers in North Carolina are using their existing PET scanners for cardiac scans. These providers either obtained their PET scanners through the need determination for general purpose PET scanners, or, in the case of Academic Medical Centers, through SMFP Policy AC-3 which exempts AMCs from need determinations under certain conditions. Either

way, none of the providers who offer cardiac PET scans obtained their scanners through a special need determination or policy for cardiac PET. Mission Health does not adequately document why all Open Heart Providers in North Carolina would need a special purpose, cardiac-only fixed PET scanner, nor what impact the policy would be regarding the proliferation of special purpose cardiac-only fixed PET scanners. Plan exemptions such as the one proposed by Mission should be sparingly adopted, and only in cases where the standard methodology does not address a real need. That is not the case here. The proposed policy undermines the standard need methodology which is validated by the current Need Determination for a fixed PET scanner in HSA I in the 2025 SMFP.

Mission Health should file a CON application in August 2025 for a dedicated PET scanner pursuant to the 2025 need determination. Nothing precludes Mission Health from submitting an application for a dedicated cardiac fixed PET. The CON will be determined and awarded based on the merits of the application.

In summary, Novant Health recommends the SHCC not adopt this unnecessary policy. Novant Health supports the standard methodology for fixed PET scanners in the SMFP. Thank you for the opportunity to comment.