



# Carolinah HealthCare System

*Edward J. Brown III*  
*Chairman*

*Michael C. Tarwater, FACHE*  
*Chief Executive Officer*

*Joseph G. Piemont*  
*President & COO*

March 22, 2013

Ms. Nadine Pfeiffer, Manager  
Medical Facilities Planning Branch  
North Carolina Division of Health Service Regulation  
809 Ruggles Drive  
Raleigh, North Carolina 27603

Dear Ms. Pfeiffer:

On behalf of Carolinas HealthCare System (CHS), I am providing the following comments regarding the petition filed by Novant Health to establish a methodology for mobile PET scanners. CHS supports the petition with the following modifications as described below.

Please note that in the spring of 2011 CHS filed a petition to expand access to mobile PET services for hospitals in rural markets by creating a methodology for mobile PET scanners similar to the existing fixed PET scanner methodology. CHS proposed using the same volume threshold to trigger a need as the fixed PET scanner methodology (2,400 procedures based on 80 percent utilization of 3,000 procedure capacity). The SHCC ultimately denied the petition on the basis of underutilized fixed PET scanner capacity in the State.

The Novant petition makes many of the same points that CHS noted in 2011. CHS is a strong supporter of providing needed and appropriate care as close to patients' homes as possible. The Levine Cancer Institute was established by CHS with the goal to provide the highest quality cancer care available and to make that care available in multiple locations closer to where the patients live. There are currently six CHS hospitals receiving services from the existing mobile PET scanner in western North Carolina and we believe there is a need for expanded access to mobile PET services in the region. We also request that the SHCC consider including a limitation on the use of mobile PET scanners in counties where excess fixed PET scanner capacity exists. This limitation will further promote access to PET services in the markets that mobile PET scanners are intended to serve.

Ms. Nadine Pfeiffer

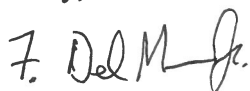
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We appreciate the opportunity to comment on this petition. We also appreciate the work of your staff and the State Health Coordinating Council (SHCC) members to promote sound health planning methods for the citizens of North Carolina.

Please do not hesitate to contact me in the event of any questions regarding this comment letter.

Sincerely,

A handwritten signature in black ink, appearing to read "F. Del Murphy, Jr.", written in a cursive style.

F. Del Murphy, Jr.

Vice President, Planning

C: Mike Vicario, North Carolina Hospital Association