

**Petition to the State Health Coordinating Council
Regarding Special Need for
Fixed Magnetic Resonance Equipment for Wake County
2020 State Medical Facilities Plan**

July 24, 2019

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STATEMENT OF REQUESTED ADJUSTMENT

Raleigh Radiology, LLC (“Raleigh Radiology”) requests the following change to the *2020 State Medical Facilities Plan (SMFP)* to address a special need for Magnetic Resonance Equipment (“MRI”) in Wake County by modifying Table 17E-3 as follows:

Table 17E-3: Fixed MRI Scanner Need Determination
(Scheduled for Certificate of Need Review Commencing in 2020)

It is determined that the service areas listed in the table below needs an additional fixed MRI scanner.

Service Areas	Fixed MRI Scanner Need Determination	Certificate of Need Application Due Date**	Certificate of Need Beginning Review Date
Wake County	1***	TBD	TBD

* Need determination shown in this document may be increased or decreased during the year pursuant to Policy GEN-2 (see Chapter 4).

** Application due dates are absolute deadlines. The filing deadline is 5:30 p.m. on the application due date. The filing deadline is absolute (see Chapter 3).

*** Provided that in response to this need, a scanner should be located in a freestanding multimodality imaging center that has an ACR accredited freestanding fixed MRI in Wake County; a sustained four-year history of exceeding the Wake County MRI Planning Threshold; at least four years of CPT evidence of sustained performance of all types of MRI scans for patients referred by primary care, internal medicine, and other specialties; a history of low charges; and, the applicant must not own a fixed MRI.

REASONS FOR THE PROPOSED ADJUSTMENT

Wake County is falling behind other North Carolina population centers in access to MRI service and a key Wake County outpatient MRI provider faces insurmountable obstacles to sustaining value. The busiest freestanding imaging center MRI provider in Wake County is Raleigh Radiology. However, it is at the mercy of a third-party vendor that owns the MRI and controls the staff,

Although the SMFP permits a provider with a busy mobile MRI to convert it to a fixed, the SMFP must first show a need in the county, and the provider must compete with other applicants.

Statement of Adverse Effects on Providers and Consumers if the Adjustment is Not Made

Wake County MRI Access Lowest among Major Population Centers

According to Chapter 17 of the *Draft 2020 State Medical Facilities Plan ("SMFP")*, Wake County has less access to MRI facilities than other North Carolina major metropolitan counties, even after considering placeholders. Mecklenburg County, with a similar population and demographics, has almost 20% more fixed equivalent magnets per capita; Durham and Forsyth have more than twice as many. The State Demographer predicts that population in Wake County will grow faster than in any of these other counties through 2024. Table 1 shows the fixed equivalent magnets per capita in 2019 and 2024, with the projected population increase. Column h compares the county by dividing each county's fixed equivalents (Column b) by the Wake County value in the same column.

Table 1: Fixed Equivalent Magnets per Capita in Wake, and Other Metropolitan Counties, 2019-2024

County	Fixed Equivalent	2019		2024		2019-2024	2019
		Population	Equivalent per 1,000 Pop.	Population	Equivalent per 1,000 Pop.	Projected Pop. Growth	Fixed Equivalents as Multiple of Wake
a	b	c	d	e	f	g	h
Wake	24.89	1,097,397	0.023	1,187,143	0.021	8.2%	1.00
Durham	16.53	317,902	0.052	341,689	0.048	7.5%	2.29
Forsyth	18.65	380,759	0.049	400,638	0.047	5.2%	2.16
Mecklenburg	29.88	1,107,795	0.027	1,196,078	0.025	8.0%	1.19
Guilford	13.69	534,499	0.026	563,772	0.024	5.5%	1.13

Source: Fixed Equivalents from 2020 SMFP Data, Population data is from Environics Analytics, Claritas

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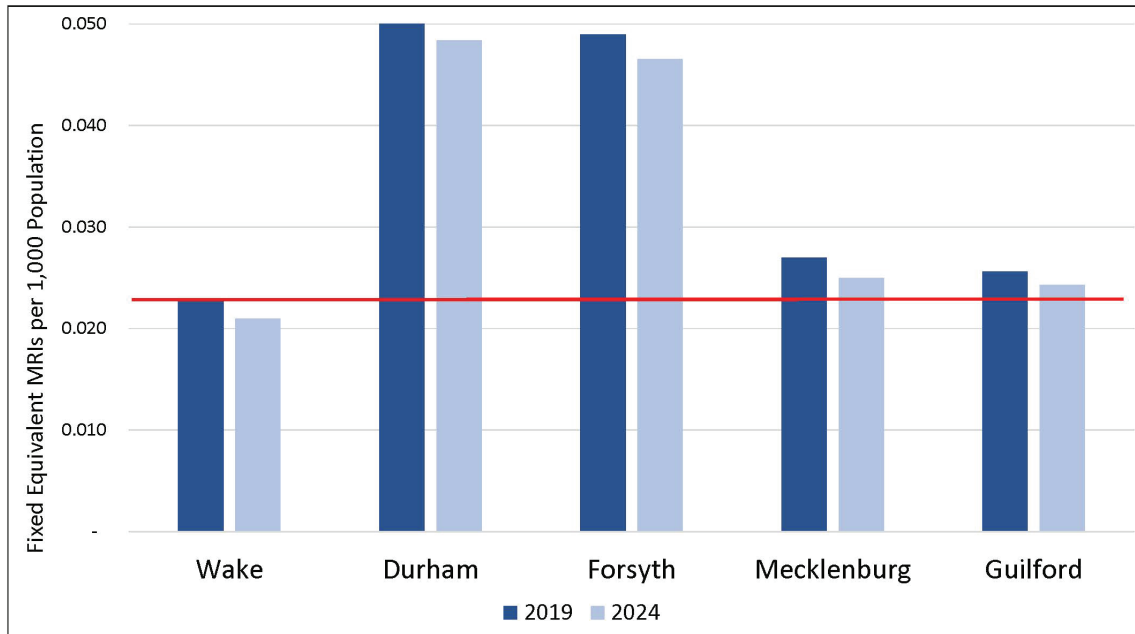
Col g: (e-c)/c

Col h: county value in Col b / Wake County value in Col b.

Wake County is unique, having the lowest per capita supply of MRI units in the state. **Wake has half the access of Durham County.**

If the 2019 Wake County need is awarded to a freestanding center, the ratios will remain unbalanced. Mecklenburg would still have 14 percent more fixed equivalent MRIs per capita than Wake.

Figure 1: MRI’s per 1,000 Population in Four Major NC Population Centers



Because of its limited supply of MRI relative to the population, Wake County is more dependent on the mobile vendors than any other large urban county in the state.

Wake County Dependence on Alliance Mobile MRI

To compensate for its MRI shortfall, Wake has become dependent on “mobile units,” most of which are owned by Alliance Healthcare Services. Compared to other urban counties Wake County has the lion’s share of Alliance-owned and operated MRIs. Wake has 8 times as many Alliance-owned fixed equivalent magnets as Mecklenburg.

Table 2: Fixed Alliance Equivalent Magnets in NC Urban Counties, 2019

County	Fixed Alliance Equivalent
Wake	4.42
Durham	0.49
Mecklenburg	0.52
Guilford	1.57
Forsyth	0.00

Source: Fixed Equivalents based on 2020 SMFP Data. Pitt, New Hanover, and Buncombe have less than one Alliance fixed equivalent. See Attachment B for supporting data.

In fact, Alliance owns 30 percent of the fixed equivalent MRIs in freestanding centers in Wake County. Alliance owns almost 44 percent fixed magnets operating in freestanding centers in Wake County.¹ Though a reasonable arrangement for start-ups, it is not a good permanent solution. The magnets are subject to Alliance terms that make it almost impossible to sustain a patient-centered price and services model. One provider, Raleigh Radiology, has been particularly hamstrung by the arrangement.

¹ See Attachment B for supporting data.

Grandfathered “Mobile” Fixed Unit Impact

Alliance has an unusual Certificate of Need (“CON”) arrangement. It owns rights to operate 26 “mobile” MRI scanners anywhere in North Carolina. By virtue of a 1993 loophole, the state permits Alliance to operate these mobile units as “fixed” units. They do not move. They are located **inside** buildings. Alliance must provide the equipment and the staff. With no other options, Raleigh Radiology accepted this option. Today, the same Alliance-owned MRI has been in the building for 11 years at Raleigh Radiology Blue Ridge.

DHSR permits this arrangement because Alliance Healthcare Services obtained rights to the mobile MRI equipment before North Carolina statute required a CON to acquire an MRI. In fact, Alliance Healthcare Services has rights to 34 mobile North Carolina MRI units, 26 of which have grandfathered status. When a provider has need, Alliance can bring a mobile from its Grandfathered stable. This increases the fixed MRI unit count in the county and slows the rate at which the SMFP methodology shows a need.

Unintended Consequence

Raleigh Radiology does not own an MRI scanner.² To many patients and payers, Raleigh Radiology is the provider of choice. Raleigh Radiology pays Alliance over \$1M annually for the MRI service at Raleigh Radiology Blue Ridge. This is significantly more than the cost Raleigh Radiology would incur if it financed, acquired, and staffed its own unit. In fact, Raleigh Radiology costs would drop by at least \$350,000 each year if the practice owned the scanner directly, a savings of \$80 per scan based on current volume. Raleigh Radiology could pass this per scan savings to uninsured, further reducing their cost.

How did we get here? The Alliance arrangement was the only MRI option available to Raleigh Radiology in 2005. The *2005 SMFP* showed a need for one MRI scanner in Wake County, but Raleigh Radiology did not have the history to compete for it. The only way for this large, value conscious radiology practice to offer MRI services was the Alliance mobile contract. In 2005, Alliance Healthcare Services and Kings Medical were the only contract providers not owned by a health care system that could offer full time MRI service at a fixed location. Kings has since sold its units to hospitals.

Having this monopoly, Alliance can keep increasing the lease price. Raleigh Radiology asked Alliance to consider selling the MRI unit, but it declined. In any event, the limited number of MRI CON opportunities in Wake County keeps the Alliance unit value so high, that the combined price to acquire both the CON rights and new MRI equipment make purchase financially infeasible. The contract is up for renewal again at the end of 2020. At that time, should Raleigh Radiology wish to increase hours of service in order to improve patient access, it is likely Alliance will increase the contract cost even more. This arrangement runs counter to the SMFP goal of reducing the cost of service. Raleigh Radiology is the only provider in Wake County with an Alliance fixed that does not also own at least one MRI.

Why Raleigh Radiology Blue Ridge? The 11-year old Alliance equipment has fully depreciated, does not have the latest technology improvements, and has begun to break down. It quenched (shut down absolutely) two times within the last month. However, Alliance chose to **repair**, rather than **replace** the equipment.

² Raleigh Radiology, LLC is not to be confused with a separate company Pinnacle to whom Raleigh Radiology provides management services and use of the name Radiology. Raleigh Radiology has no ownership in Pinnacle and no right to adjust Pinnacle schedules for needs of Raleigh Radiology patients.

Value is critical. This lease arrangement is operationally cumbersome and difficult to cost justify. The cost for lease renewals increases annually by the CPI (historically 1.5 – 2%); the equipment continues to age; and Raleigh Radiology has no control over staffing.

People who staff the MRI work for Alliance Healthcare Services, which means they rely on Alliance for training and work the hours that Alliance sets. This produces:

- Unnecessary overtime expense and inflexible staff schedules; and,
- Less flexible patient schedules and longer than necessary patient waits for scans.

Impact on Wake County Consumers

Wake County's uninsured and underinsured persons need a Raleigh Radiology owned MRI. Raleigh Radiology is the competitive pace setter, offering the lowest comprehensive MRI prices and extended hour schedules. Only single specialty, closed panel vendors offer lower prices. Raleigh Radiology does not own an MRI and thus is entirely at the mercy of an outside vendor. When a stop action event occurs, as it did in June 2019, Raleigh Radiology has no back up, except to rely on Alliance to find a mobile. Because Alliance mobiles are booked, its inventory for last minute mobiles is limited to leftovers. Both of Raleigh Radiology in house Alliance MRIs are full. Adding overtime adds to the cost. The Alliance lease agreements provide less flexibility with operating hours than an owned scanner. When staff work for the provider, it can run the scanner as often as needed.

The Proposed 2020 MRI Policy and Methodology adversely affect both Raleigh Radiology and Wake County. As written, the Proposed 2020 SMFP will sustain Wake County access barriers and tie Raleigh Radiology to a costly MRI lease that runs counter to value and customer service. . Following the June 2019 total shutdown of the MRI equipment, Alliance eventually provided a mobile unit to cover the period of repairs – but that unit had its own problems.

During the shutdown, Raleigh Radiology had to recall patients to correct machine image problems and arranged to send others elsewhere at the last minute. In short, Raleigh Radiology is the only freestanding imaging center in the state that is incapable of managing the quality of its entire MRI service line.

Without the proposed adjusted need determination, Raleigh Radiology's value service is at risk. Alliance can keep raising prices and decide when to upgrade equipment. Without this proposed special need change in the 2020 SMFP fixed MRI need in Wake County, the service will stay at risk.

In summary, failing to approve this petition would have unacceptable adverse effects. It would:

- Contradict the SMFP's "Basic Principles" of encouraging safety and quality, access, and value;
- Leave Wake County with the lowest access to MRI among major metro areas in the state;
- Reduce competition;
- Restrict mechanisms for reducing MRI cost and upgrading equipment;
- Give the busiest freestanding imaging center in Wake County no control over MRI equipment or staff, and limited control over hours of service; and,
- Restrict hours of service for a unit the SMFP identifies as "fixed."

Accessibility to Traditionally Underserved Groups

The CON statute and the SMFP Basic Principles favor service to traditionally underserved groups. Raleigh Radiology is a **safety net provider**. It accepts payment from Medicare, Medicaid, Veterans Administration, and State Employee Health Plan. Furthermore, it provides deep discounts to uninsured patients that could be deeper if it could eliminate the Alliance overhead cost. Insured patients with high deductibles and coinsurance already benefit from lower out of pocket costs with Raleigh Radiology because its contracts with the insurers are more competitive than other local providers. Major payers in the State are seeking to reduce further MRI payments. Raleigh Radiology will be better positioned to weather these reimbursement decreases and sustain this high-value MRI service if it owned its own scanner

Declining Payments, Rising Costs

Reimbursement for radiology procedures has been declining for years. Between 2018 and 2019, Medicare reimbursement for certain high-volume MRI procedures decreased by as much as 20 percent, and other payers followed suit.

During that same time, Raleigh Radiology’s payment to Alliance increased by a two percent annual CPI factor, plus extra charges associated with schedule adjustments that Raleigh Radiology made to accommodate the increasing numbers of patients who were requesting services. While increased staffing would reasonably add some incremental cost, because the staff are contracted, each increased staff hour includes additional Alliance overhead and profit cost. Alliance charges an overtime premium, after the normal business day. If Raleigh Radiology controlled the staffing, it could organize shift coverage at less cost.

Raleigh Radiology schedule access is good today. The practice schedules 82 hours a week, well above what has been the 66-hour CON requirement for fixed MRI. Increased lease costs will challenge the schedule

Four-Year History of Scans Exceeding MRI Thresholds

Raleigh Radiology Blue Ridge MRI history speaks for itself. In the last 12 months, Wake County residents accounted for approximately 80 percent of its MRI scans. As illustrated in the following tables, Raleigh Radiology is the county’s low-cost provider and it has weathered the obstacles to increase MRI service to Wake County year after year. Raleigh Radiology Blue Ridge MRI exceeded the SMFP threshold for a fixed scanner in each of the last four years. Table 3 shows the annual adjusted MRI scans for the last four full reported fiscal years.

Table 3: Total Raleigh Radiology Blue Ridge Adjusted MRI Scans, FY 2014-FY 2018

	License Renewal Data Year				
	2014	2015	2016	2017	2018
Adjusted MRI Scans	4,545	5,329	5,886	5,973	6,004
Wake Threshold	4,805	4,805	4,805	4,805	4,805
Percent of Threshold	95%	111%	122%	124%	125%

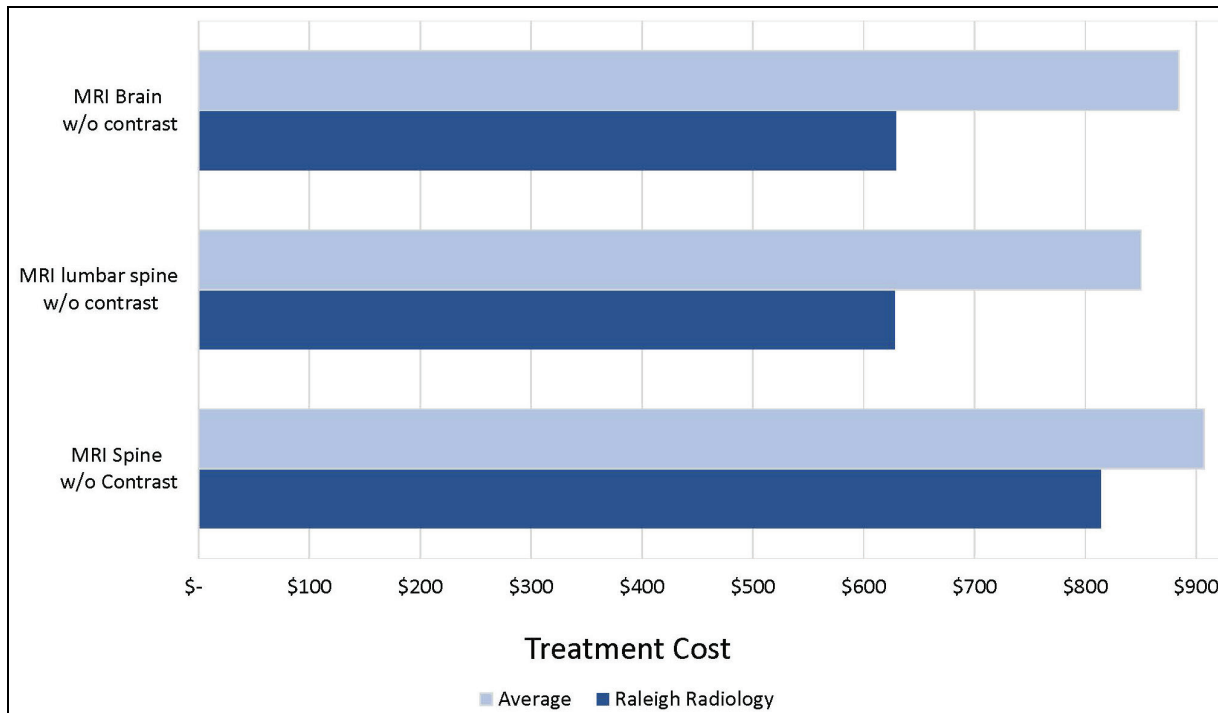
Source: 2016-2020 SMFP, Table 9P and 17E-1

Value Provider

Advanced capabilities among Raleigh Radiology professionals, sub-specialty reads, the radiologists’ involvement in continuous training, and commitment to American College of Radiology accreditation assure high quality services. The combination of low cost to patients and commitment to quality makes Raleigh Radiology the highest-value multimodality-radiology provider in Wake County. The practice saves patients hundreds of dollars for the same scan.

Data from the Blue Cross, online Cost Evaluator tool for the same procedure, confirm that Raleigh Radiology is the best value. Raleigh Radiology MRI scans cost less than at least five other Wake County providers. For example, consider an MRI spine w/o contrast charges for all providers. Provider A was \$819, Provider B, \$825; Provider C, \$898; Provider D, \$1,011; Provider E \$1,318 and Raleigh Radiology was \$814. The most expensive freestanding center charges 62 percent more. These comparisons involve only freestanding radiology practices. Hospital-based providers have much higher costs. See Attachment A for supporting data.

Figure 2: Raleigh Radiology versus Average Freestanding Center, 2019



Source: BCBS treatment costs estimator, <http://www.bcbsnc.com/content/providersearch/treatments/index.htm#/>, and accessed 6/26/19

This chart compares Global payments—the payments include both the MRI scan and the physician fee.

Patient concerns motivate Raleigh Radiology decisions. Recognizing the increasing number of patients who have high deductible and co-payments, Raleigh Radiology developed payment plans and discounts to make it possible for people to get the diagnostic information they need for treatment planning at affordable rates.

Statement of Alternatives Considered and Found Not Feasible

Raleigh Radiology considered and rejected these alternatives:

- Maintain the Status Quo;
- Risk an application for the Wake County MRI Need in the 2019 SMFP;
- Ask for a Larger Need Determination;
- Cancel or Reduce the Alliance contract; or
- Wait for a change in the SMFP MRI Methodology

Maintain the Status Quo

Raleigh Radiology is operating under the status quo at two busy sites and finds it cost prohibitive and less than optimal for patient care. The present arrangement limits service. Alliance owns the equipment, controls the staff, selects the upgrades, and controls the image production. Raleigh Radiology must work through this third party to set technical quality and performance standards. Raleigh Radiology cannot perform routine equipment maintenance, plan to replace the machine, or control the repair schedule when the equipment fails.

Already high leasing and service fees increase annually. All of this amounts to a less than optimal experience for patients and should not be occurring in Wake County, one of the state's showcase technology centers, where highly trained physicians provide tertiary referral services. Raleigh Radiology's full schedules and the Proposed 2020 SMFP structure could have the net effect of driving patients out of the county for MRI services. Without change, a value provider like Raleigh Radiology will face increasing lease costs until the lease is unsustainable. A provider not so constrained, would purchase an MRI.

Raleigh Radiology is the only freestanding radiology practice in the state that cannot control the quality of any MRI unit located inside its buildings. MRI is a standard imaging modality. The status quo is not a reasonable alternative.

Pursue 2019 Need

Raleigh Radiology tested this alternative path at great cost. The CON review criteria favor hospitals and new providers over an existing provider that offers low charges to working and insured individuals, but has lower percentages of Medicare and Medicaid patients. In 2016, Raleigh Radiology's CON application offered the lowest net revenue and the lowest cost, but the state rejected the application in favor of a new applicant whose parent company has many MRI's. The chosen applicant proposed a new location. Raleigh Radiology contested this decision at great cost. The issue remains unresolved. Counting on this alternative in a competitive environment would not be prudent. It would not guarantee award to an existing provider seeking replacement of an MRI. It will not address the imbalance in Wake County. It will not assure focus on Raleigh Radiology's particular dilemma.

Ask for a Larger Need Determination

If the sole criteria for need were performance of its two scanners, Raleigh Radiology would ask for two additional MRI scanners in Wake County, one each for Blue Ridge and Cary, which has a similar Alliance lease. However, Raleigh Radiology fears that the SHCC would view such a request as too ambitious. Rather than risk rejection, Raleigh Radiology is making a more conservative request, one special need MRI with appropriate conditions to provide relief for the older scanner at Blue Ridge.

At current MRI growth rates, and because of the structure of the methodology, it will be years before the SMFP provides another fixed MRI need in Wake County.

Wait for a Change in the Methodology

Methodology changes involve months of debate and staff analyses of statewide impact. It would be inequitable to force Wake County to live with restricted access while this occurs.

Pursue a Special Need Determination

Just adding one more scanner to Wake County will not solve the problem. As history demonstrates, without specific limits on the fixed scanner need, the CON review process does not favor MRI replacement, even when the provider is a demonstrated leader in providing value and low cost for the working population. A large portion of the working population has insurance, which in the past meant well served. However, today's outpatient insurance structure means that the people most likely to need an MRI struggle with high deductibles and copayments.

In 2015, the SHCC approved a Raleigh Radiology petition to remedy the situation with a need for one more fixed MRI in Wake County, but Raleigh Radiology was an unsuccessful applicant. Traditional comparative review for new fixed scanners does not accommodate this situation. As such, a special need determination for a replacement scanner is appropriate. This solution would also provide relief for Wake County, which is currently underserved by MRI units.

To address the inequities, Wake County needs another fixed scanner specifically targeted to replace equipment at a provider with a history of low charges that does not have ownership of a fixed MRI, provides a full suite of MRI services, and has a demonstrated history of exceeding the Wake County MRI threshold, as reported in the SMFPs.

This is not an unusual request. SMFPs have many precedents for including a special need targeted to providers who have demonstrated capacity on mobile units. The methodology for cardiac catheterization lets an applicant apply to replace a mobile with a shared fixed unit if the existing service demonstrates a history of only 16 percent of the state determined capacity of a fixed unit (240/1,500). The 2016 SMFP identified a special need uniquely targeted to a replacement MRI for a community hospital with a similar Alliance arrangement. This prompted additional debate and Policy TE-3 was a follow up to that 2016 special need. TE-3 allows hospitals with an emergency room but no owned MRI, to apply for one fixed MRI.

EVIDENCE OF NON-DUPLICATION OF SERVICES

A special need in Wake County would involve no duplication of MRI services in Wake County. Wake County is underserved, as demonstrated on pages 2 and 3 of this petition.

EVIDENCE OF CONSISTENCY WITH NORTH CAROLINA STATE MEDICAL FACILITIES PLAN BASIC PRINCIPLES

Safety and Quality

This basic principle notes:

"...priority should be given to safety, followed by clinical outcomes, followed by satisfaction.

"...As experience with the application of quality and safety metrics grows, the SHCC should regularly review policies and need methodologies and revise them as needed to address any persistent and significant deficiencies in safety and quality in a particular service area."

Providing an option for an established, ACR accredited provider to reduce the MRI deficit in Wake County would meet the safety and quality principle.

Access

This basic principle notes:

"...The first priority is to ameliorate economic barriers and the second priority is to mitigate time and distance barriers.

"...The SHCC planning process will promote access to an appropriate spectrum of health services at a local level, whenever feasible under prevailing quality and value standards."

MRI is a conventional diagnostic tool. With one more fixed MRI, Wake County would still not reach parity with Mecklenburg, whose population is about the same.

The proposed restrictions would assure that a historically underserved group -- outpatients with high deductible and copay insurance -- has affordable MRI access.

Value

This basic principle notes:

"The SHCC defines health care value as the maximum health care benefit per dollar expended.

"...Cost per unit of service is an appropriate metric..."

"...At the same time overutilization of more costly and/or highly specialized low-volume services without evidence-based medical indication may contribute to escalating health costs without commensurate population-based health benefit."

The proposed changes will enable replacement of a more costly service without placing unnecessary pressure on a new health care provider to increase utilization. Restricting to an applicant with a sustained history of increasing volume will assure the highest impact on sustained value. Restricting the award to an applicant that does not own an MRI would assure sustained competition in the county.

CONCLUSION

Raleigh Radiology is asking for a special need determination for one fixed MRI scanner in Wake County with restrictions on the applicant.

- An existing, freestanding imaging center, with an ACR-accredited freestanding fixed MRI, and a four-year continuous record of exceeding the Wake MRI threshold as represented in Table 17E;
- No ownership of an MRI, itself or through a commonly owned entity; and
- A demonstrated history of low patient charges and comprehensive scope of MRI scans.

There is precedent and the request is in keeping with the governing principles in the *State Medical Facilities Plan* of maximizing quality, access, and value.

ATTACHMENTS

Analysis of Blue Cross Treatment Estimator Costs in Freestanding Facilities A

Alliance freestanding ownership analysis, Wake County B

Attachment A

Prices for common MRI procedures at major freestanding imaging centers in Raleigh, based on NC BCBS treatment cost estimator

MRI Provider	MRI Spine w/o Contrast	MRI lumbar spine w/o contrast	MRI Brain w/o contrast
Orthopaedic Specialists of NC	\$665.00	\$597.00	
Raleigh Radiology	\$814.00	\$628.00	\$629.00
EmergeOrtho	\$819.00		\$799.00
Cary Orthopaedic	\$825.00	\$805.00	
Raleigh Orthopaedic	\$898.00	\$880.00	
Raleigh Neurology Imaging	\$1,011.00	\$887.00	\$917.00
Wake Radiology	\$1,318.00	\$1,303.00	\$1,192.00
Average	\$907.14	850.00	884.25

Source: BCBS treatment costs estimator, [http://www.bcbsnc.com/content/providersearch/treatments/index.htm#/,](http://www.bcbsnc.com/content/providersearch/treatments/index.htm#/) accessed 6/26/19

Notes: a. All values for Blue Advantage
 b. Lowest value estimate provided for multiple values of same provider
 c. Orthopaedic Specialists of NC serves only its own patients.

Attachment B

Freestanding and Mobile Summary by Population Center Counties

Data Source: 2020 Proposed SMFP

Service Area	Service Type	CON #	Service Site (Provider/Owner)	Fixed Magnet	Fixed Equiv	Alliance Owned	Alliance Fix Eqv	% Alliance
Wake	Freestanding Fixed		Raleigh Neurology Associates, P.A. (Raleigh Neurology Associates)	1.00	1.00			
Wake	Freestanding Fixed	Grandfathered	Raleigh Neurology Imaging (Alliance Healthcare Services)	1.00	1.00	x	1.00	
Wake	Freestanding Fixed	Grandfathered	Raleigh Radiology (Alliance Healthcare Services)	1.00	1.00	x	1.00	
Wake	Freestanding Fixed	J-007289-05	Raleigh Radiology Cedarhurst (Pinnacle Health Services of NC, LLC)	1.00	1.00			
Wake	Freestanding Fixed	J-7605-06	The Bone & Joint Surgery Clinic	1.00	1.00			
Wake	Freestanding Fixed	Grandfathered	Wake Radiology	1.00	1.00			
Wake	Freestanding Fixed	Grandfathered	Wake Radiology Diagnostic Imaging (Alliance Healthcare Services)	1.00	1.00	x	1.00	
Wake	Freestanding Fixed	J-005783-97	Wake Radiology Raleigh MRI Center (Wake Radiology)	1.00	1.00			
Wake	Freestanding Fixed	Grandfathered UNIT WITH dr TO INSTALL	Wake Radiology-Garner (Alliance Healthcare Services)	1.00	1.00	x	1.00	
Wake	Mobile	O-006665-02	Cary Ortho (Cape Fear Mobile Imaging, LLC)	-	0.15			
Wake	Mobile	J-007008-04	Cary Orthopedic and Sports (Foundation Health Mobile Imaging LLC)	-	-			
Wake	Mobile	Grandfathered	Duke Health Raleigh Hospital (Alliance Healthcare Services)	-	0.03	x	0.03	
Wake	Mobile	Grandfathered	Duke Health Raleigh Hospital (Alliance Healthcare Services)	-	0.36			

Service Area	Service Type	CON #	Service Site (Provider/Owner)	Fixed Magnet	Fixed Equiv	Alliance Owned	Alliance Fix Eqv	% Alliance
Wake	Mobile	Grandfathered; J- 008529- 10	Duke Raleigh Hospital	-	0.50			
Wake	Mobile	Grandfathered	Duke Raleigh Hospital (Alliance Healthcare Services)	-	0.13	x	0.13	
Wake	Mobile	J-008453-09	EmergeOrtho	-	0.55			
Wake	Mobile	J-008453-09	EmergeOrtho	-	0.19			
Wake	Mobile	Grandfathered	EmergeOrtho, P.A. (Alliance Healthcare Services)	-	-	x	-	
Wake	Mobile	Grandfathered	EmergeOrtho, P.A. (Alliance Healthcare Services)	-	0.01	x	0.01	
Wake	Mobile	J-007008-04	NC Diagnostic Imaging Cary (Foundation Health Mobile Imaging LLC)	-	-			
Wake	Mobile	Grandfathered	North Carolina Diagnostic - Cary (Foundation Health Mobile Imaging LLC)	-	-			
Wake	Mobile	O-006665-02	Orthopaedic Specialists of NC (Cape Fear Mobile Imaging, LLC)	-	0.25			
Wake	Mobile	J-007008-04	Raleigh Neurosurgical Clinic (Foundation Health Mobile Imaging LLC)	-	0.09			
Wake	Mobile	Grandfathered	Raleigh Neurosurgical Clinic (Foundation Health Mobile Imaging LLC)	-	0.25			
Wake	Mobile	Grandfathered	Raleigh Orthopaedic Clinic (Alliance Healthcare Services)	-	-	x	-	
Wake	Mobile	J-007756-06	Raleigh Orthopaedic Clinic (Raleigh Orthopaedic Clinic, PA)	-	0.12			
Wake	Mobile	J-007756-06	Raleigh Orthopaedic Clinic (Raleigh Orthopaedic Clinic, PA)	-	0.38			
Wake	Mobile	J-007756-06	Raleigh Orthopaedic Clinic Cary (Raleigh Orthopaedic Clinic, PA)	-	0.12			
Wake	Mobile	J-007756-06	Raleigh Orthopaedic Clinic Garner (Raleigh Orthopaedic Clinic, PA)	-	0.15			

Service Area	Service Type	CON #	Service Site (Provider/Owner)	Fixed Magnet	Fixed Equiv	Alliance Owned	Alliance Fix Eqv	% Alliance
Wake	Mobile	Grandfathered	Raleigh Orthopedic (Alliance Healthcare Services)	-	0.07	x	0.07	
Wake	Mobile	Grandfathered	Raleigh Orthopedics Raleigh (Alliance Healthcare Services)	-	-	x	-	
Wake	Mobile	Grandfathered	Raleigh Radiology - Brier Creek (Foundation Health Mobile Imaging LLC)	-	0.44			
Wake	Mobile	J-008268-08	Raleigh Radiology at Cedarhurst Dr (Pinnacle Health Services of NC, LLC)	-	0.16			
Wake	Mobile	J-008268-08	Raleigh Radiology at Wake Forest (Pinnacle Health Services of NC, LLC)	-	0.50			
Wake	Mobile		Rex Hospital - Wakefield	-	0.27			
Wake	Mobile	J-007012-04	Wake Radiology Cary (Wake Radiology)	-	0.08			
Wake	Mobile	J-007012-04	Wake Radiology Fuquay-Varina (Wake Radiology)	-	0.08			
Wake	Mobile	J-007012-04	Wake Radiology Wake Forest (Wake Radiology)	-	0.29			
Wake	Mobile		WakeMed Apex Healthplex	-	0.09			
Wake	Mobile	J-007043-04	WakeMed Apex Healthplex (WakeMed Health and Hospitals)	-	0.02			
Wake	Mobile		WakeMed Brier Creek Healthplex	-	-			
Wake	Mobile	J-007119-04	WakeMed Cary	-	-			
Wake	Mobile		WakeMed Garner Healthplex	-	0.06			
Wake	Mobile	Grandfathered	WakeMed Garner Healthplex (Alliance Healthcare Services)	-	0.05	x	0.05	
Wake	Mobile	J-007043-04	WakeMed Garner Healthplex (WakeMed Health and Hospitals)	-	0.01			
Wake	Mobile		WakeMed North	-	0.08			

Service Area	Service Type	CON #	Service Site (Provider/Owner)	Fixed Magnet	Fixed Equiv	Alliance Owned	Alliance Fix Eqv	% Alliance
Wake	Mobile	J-007043-04	WakeMed North Family Health & Women's Hospital (WakeMed Health and Hospitals)	-	0.08			
Wake	Mobile		WakeMed Raleigh Medical Park	-	0.13			
Wake	Mobile	J-007043-04	WakeMed Raleigh Medical Park (WakeMed Health and Hospitals)	-	0.07			
Wake	Mobile	Grandfathered	WakeMed- Raleigh Medical Park (Alliance Healthcare Services)	-	0.06	x	0.06	
Wake	Mobile	Grandfathered	WakeMed-Apex Healthplex (Alliance Healthcare Services)	-	0.07	x	0.07	
Wake	Freestanding Fixed			9.00			4.00	44.4%
	Freestanding Fixed + Mobile				14.89		4.42	29.7%
Mecklenburg	Freestanding Fixed	F-008106-08	Carolina NeuroSurgery & Spine Associates Charlotte (Carolina NeuroSurgery & Spine Associates)	1	1			
Mecklenburg	Freestanding Fixed	F-007167-04	Carolinas Imaging Services- Ballantyne (Carolinas Imaging Services, LLC)	1	1			
Mecklenburg	Freestanding Fixed	F-011182-16	Carolinas Imaging Services- Huntersville (Carolinas Imaging Services, LLC)	1	1			
Mecklenburg	Freestanding Fixed	F-005918-98	Carolinas Imaging Services- Southpark (Carolinas Imaging Services, LLC)	1	1			
Mecklenburg	Freestanding Fixed	F-007068-04	Novant Health Imaging Southpark(Mecklenburg) (Mecklenburg Diagnostic Imaging, Inc.)	1	1			
Mecklenburg	Freestanding Fixed	F-10287-14	OrthoCarolina Ballantyne (OrthoCarolina, P.A.)	1	1			
Mecklenburg	Freestanding Fixed	J-006698-02	OrthoCarolina Spine Center (OrthoCarolina, P.A.)	1	1			

Service Area	Service Type	CON #	Service Site (Provider/Owner)	Fixed Magnet	Fixed Equiv	Alliance Owned	Alliance Fix Eqv	% Alliance
Mecklenburg	Freestanding Fixed	F-005748-97	PIC- Ballantyne (Novant Health Imaging Ballantyne)	1	1			
Mecklenburg	Freestanding Fixed	F-007068-04	PIC South Park (Mecklenburg) (Mecklenburg Diagnostic Imaging, Inc.)	0	0			
Mecklenburg	Mobile	F-006830-03; F-011425- 17	Atrium Health Pineville	0	0.21			
Mecklenburg	Mobile	F-006868-03	Atrium Health- Pineville (Carolinas Imaging Services, LLC)	0	0.01			
Mecklenburg	Mobile	F-005919-98	Atrium Health University City	0	0.16			
Mecklenburg	Mobile	F-006868-03	Atrium Health, Carolina Neurological (Carolinas Imaging Services, LLC)	0	0.08			
Mecklenburg	Mobile	F-006734-03	Ballantyne (Carolina NeuroSurgery & Spine Associates)	0	0.31			
Mecklenburg	Mobile		Carolina Neurosurgery & Spine Associates (Alliance Healthcare Services)	0	0.16	x	0.16	
Mecklenburg	Mobile	F-006734-03	Carolina NeuroSurgery & Spine Associates-Charlotte (Carolina NeuroSurgery & Spine Associates)	0	0.99			
Mecklenburg	Mobile	F-007040-04	Carolinas Imaging Services- Huntersville (Carolinas Imaging Services, LLC)	0	0.45			
Mecklenburg	Mobile		Carolinas Medical Center - Main	0	0.03			
Mecklenburg	Mobile	Grandfathered	Charlotte Eye, Ear, Nose & Throat (Alliance Healthcare Services)	0	0.1	x	0.10	
Mecklenburg	Mobile	F-005723-97	Mecklenburg Neurological Associates (InSight Imaging)	0	0.09			
Mecklenburg	Mobile		NH Imaging University	0	0.34			
Mecklenburg	Mobile	F-005580-97; F-008237- 08; F-0011184-16	Novant Health Huntersville Medical Center	0	0.23			

Service Area	Service Type	CON #	Service Site (Provider/Owner)	Fixed Magnet	Fixed Equiv	Alliance Owned	Alliance Fix Eqv	% Alliance
Mecklenburg	Mobile	Grandfathered mobile unit	Novant Health Huntersville Medical Center (King's Medical Group)	0	0.18			
Mecklenburg	Mobile	Grandfathered	Novant Health Huntersville Medical Center (King's Medical Group)	0	0.04			
Mecklenburg	Mobile	Grandfathered	Novant Health Imaging Steel Creek (King's Medical Group)	0	0.15			
Mecklenburg	Mobile	Grandfathered	Novant Health Imaging University (King's Medical Group)	0	0.15			
Mecklenburg	Mobile	F-007164-04	Novant Health Imaging University (Presbyterian Mobile Imaging, LLC)	0	0.04			
Mecklenburg	Mobile	F-007164-04	Novant Health Imaging-Steele Creek (Presbyterian Mobile Imaging, LLC)	0	0.04			
Mecklenburg	Mobile	Grandfathered	Novant Health Matthews Medical Center (King's Medical Group)	0	0.13			
Mecklenburg	Mobile	Grandfathered	OrthoCarolina (Alliance Healthcare Services)	0	0.09	x	0.09	
Mecklenburg	Mobile	F-007987-07	OrthoCarolina - Huntersville (OrthoCarolina, P.A.)	0	0.33			
Mecklenburg	Mobile	F-007987-07	OrthoCarolina Matthews (OrthoCarolina, P.A.)	0	0.55			
Mecklenburg	Mobile	F-007987-07	OrthoCarolina Mobile Spine (OrthoCarolina, P.A.)	0	0.56			
Mecklenburg	Mobile	Grandfathered	OrthoCarolina-Spine Center (Alliance Healthcare Services)	0	0.17	x	0.17	
Mecklenburg	Mobile		Presbyterian Mobile MRI Only	0	0.29			
Mecklenburg	Freestanding Fixed			8.00			-	0.0%
	Freestanding + Mobile				13.88		0.52	3.7%
Forsyth	Freestanding Fixed	Grandfathered	Novant Health Imaging Piedmont (Piedmont Imaging, LLC)	1	1			

Service Area	Service Type	CON #	Service Site (Provider/Owner)	Fixed Magnet	Fixed Equiv	Alliance Owned	Alliance Fix Eqv	% Alliance
Forsyth	Freestanding Fixed	G-006893-03	Novant Health Imaging Piedmont (Piedmont Imaging, LLC)	1	1			
Forsyth	Freestanding Fixed	G-007780-07	Wake Forrest Baptist Imaging (Wake Forest Baptist Imaging)	1	1			
Forsyth	Mobile	G-7053-04	Cone Health MedCenter Kernersville (Alamance Regional Medical Center)	0	0.11			
Forsyth	Mobile	F-005723-97	Forsyth Imaging Center (InSight Imaging)	0	0.05			
Forsyth	Mobile		Novant Health Forsyth Medical Center-Mobile MRI	0	0.46			
Forsyth	Mobile	G-007723-06	OrthoCarolina Kernersville (OrthoCarolina, P.A.)	0	0.11			
Forsyth	Mobile	G-007723-06	OrthoCarolina Winston Salem (OrthoCarolina, P.A.)	0	0.92			
Forsyth	Freestanding Fixed			3			-	0.0%
	Freestanding + Mobile				4.65		-	0.0%
Guilford	Freestanding Fixed	G-007269-05	Cornerstone Imaging (Cornerstone Health Care, PA)	1	1			
Guilford	Freestanding Fixed	Grandfathered	Greensboro Imaging (Diagnostic Radiology & Imaging, LLC)	1	1			
Guilford	Freestanding Fixed	G-006952-03	Greensboro Imaging (Diagnostic Radiology & Imaging, LLC)	1	1			
Guilford	Freestanding Fixed		Greensboro Imaging (Diagnostic Radiology & Imaging, LLC)	1	1			
Guilford	Freestanding Fixed	G-008347-09	Greensboro Orthopaedics PA (Greensboro Orthopaedics, P.A.)	1	1			
Guilford	Freestanding Fixed	Grandfathered	Triad Imaging (Novant Health Imaging Triad)	1	1			

Service Area	Service Type	CON #	Service Site (Provider/Owner)	Fixed Magnet	Fixed Equiv	Alliance Owned	Alliance Fix Eqv	% Alliance
Guilford	Mobile	Grandfathered	Cone MedCenter High Point-Greensboro (Alliance Healthcare Services)	0	0.11	x	0.11	
Guilford	Mobile		Carolina Neuro and Spine Assoc (Alliance Healthcare Services)	0	0.35	x	0.35	
Guilford	Mobile		Cone Health-MedCenter High Point	0	0.12			
Guilford	Mobile	Grandfathered	Cone MedCenter High Point (Alliance Healthcare Services)	0	0.11	x	0.11	
Guilford	Mobile	Grandfathered	SE Orthopaedic Specialists, PA (Alliance Healthcare Services)	0	1	x	1	
Guilford	Freestanding Fixed			6			1.57	26.2%
	Freestanding + Mobile				7.69		1.57	20.4%
Durham	Freestanding Fixed	J-006760-03	Durham-Independence Park (Durham Diagnostic Imaging- Independence Park)	1	1			
Durham	Freestanding Fixed	J-007031-04	EmergeOrtho	1	1			
Durham	Freestanding Fixed	J-008107-08	EmergeOrtho	1	1			
Durham	Mobile	Grandfathered	Duke Regional Hospital (Alliance Healthcare Services)	0	0.41	x	0.41	
Durham	Mobile		Duke University Hospital - Lenox Baker	0	0.62			
Durham	Mobile		Duke University Hospital - Page Road	0	0.22			
Durham	Mobile	O-006665-02	Durham - Southpark (Cape Fear Mobile Imaging, LLC)	0	0.08			
Durham	Mobile	Grandfathered	Durham Diagnostic - Independence Park (King's Medical Group)	0	0			

Service Area	Service Type	CON #	Service Site (Provider/Owner)	Fixed Magnet	Fixed Equip	Alliance Owned	Alliance Fix Eqv	% Alliance
Durham	Mobile	M-006605-02	Durham Diagnostic Imaging at Triangle Medical Park (Mobile Imaging of North Carolina, LLC)	0	0.12			
Durham	Mobile	Grandfathered	Raleigh Neurology Imaging (Alliance Healthcare Services)	0	0.08	x	0.08	
Durham	Freestanding Fixed			3			0.49	16.3%
	Freestanding + Mobile				4.53		0.49	10.8%