

TO: North Carolina Division of Health Service Regulation  
Healthcare Planning and Certificate of Need Section  
[DHSR.SMFP.Petitions-Comments@dhhs.nc.gov](mailto:DHSR.SMFP.Petitions-Comments@dhhs.nc.gov)

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COMMENT: Opposition to the WakeMed Petition to Change Policy TE-3

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Alliance Healthcare Services opposes the WakeMed petition that recommends changes to Policy TE-3 because it undermines the MRI Workgroup's recommendations to change the methodology for fixed MRI scanners. Without knowing the outcome of the proposed changes to the fixed MRI methodology, it is impossible to foresee the consequences of the proposed changes to Policy TE-3 and how it would increase future MRI inventory and impact the implementation of the updated MRI methodology. Furthermore, it would be difficult to evaluate the performance of the changes to the MRI methodology if the proposed changes to Policy TE-3 are changed at the same time.

Policy TE-3 was originally implemented to enable community hospitals in small rural counties that lacked fixed MRI to obtain fixed MRI scanners to improve patient access. The proposed change by WakeMed is strategy for the dominant urban hospitals with multiple campuses to gain additional MRI capacity through noncompetitive CON applications.

The proposed changes to Policy TE-3 would certainly cause unnecessary duplication because it establishes no limit as to how many TE-3 MRI scanners could seek CON approval each year. WakeMed Hospitals and outpatient locations already have tremendous MRI capacity throughout Wake County. Also, WakeMed will have the same opportunity as others to submit a summer petition for an adjusted need determination for a fixed MRI scanner in Wake County. Therefore, the proposed changes to Policy TE-3 are not reasonable and adequately supported.

Alliance urges the Technology and Equipment Committee and the State Health Coordinating Council to deny this petition.

Thank you for your consideration.