

North Carolina State Health Coordinating Council  
809 Ruggles Drive  
Raleigh, NC 27603

Dear North Carolina State Health Coordinating Council:

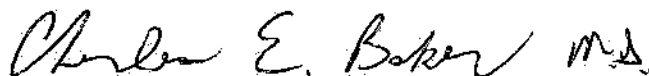
I am writing to express my support for the petition filed by Appalachian Regional Healthcare System (ARHS) to create a special need adjustment in the *2024 State Medical Facilities Plan (2024 SMFP)* for the conversion of an approved or existing fixed MRI scanner in Watauga County to a mobile MRI scanner. This special need determination would allow a provider in Watauga County with an existing or approved fixed magnetic resonance imaging (MRI) scanner to apply for a Certificate of Need (CON) to convert that fixed MRI scanner to a mobile MRI scanner. As an ARHS provider who primarily treats rural patients, I can strongly state that such an initiative would significantly impact providers' ability to flexibly provide effective care and increase accessibility for patients in our community.

Under the current *SMFP*, providers have two options for developing MRI services: apply for a fixed MRI scanner once a need is identified in their service area or apply for a statewide mobile MRI scanner when one becomes available via an adjusted need determination. In other words, providers must either serve their patient population with a fixed MRI scanner or create a mobile MRI service and potentially compete with other mobile providers across the state. These are fairly limited options, especially considering physicians like myself are focused on serving their patient population as effectively as possible. ARHS's petition proposes a third alternative: allow a provider who has demonstrated sufficient volume to support a fixed MRI the flexibility to improve geographic accessibility to the service by developing a mobile MRI instead.

As a provider located in the North Carolina "High Country," a largely rural and mountainous region of the state known for high elevation, difficult terrain, and frequent inclement weather, I am familiar with the challenges my patients face in seeking accessible and convenience care. Often, and at no fault of their own, providers are unable to flexibly adapt their existing MRI services to their largely dispersed and geographically diverse patient populations. However, having the ability to convert an existing or approved fixed MRI scanner to a mobile MRI scanner will allow providers like me and my fellow physicians to recommend services that are more geographically accessible for our patients. Rural communities like ours frequently and unfortunately struggle with being granted timely and equitable care, and, as the SHCC is certainly aware, North Carolina is a heavily rural state. The addition of a special need adjustment for the conversion of an approved or existing fixed MRI scanner in Watauga County to a mobile MRI scanner would improve access for patients in Watauga and surrounding counties, health equity, and overall effectiveness of care.

Please note that this letter may resemble the format of those signed by my colleagues; however, that should not detract from the fact that I fully support ARHS's petition.

Sincerely,

 Charles E. Baker M.D.

July 26, 2023

North Carolina State Health Coordinating Council  
809 Ruggles Drive  
Raleigh, NC 27603

Dear North Carolina State Health Coordinating Council:

I am writing to express my support for the petition filed by Appalachian Regional Healthcare System (ARHS) to create a special need adjustment in the *2024 State Medical Facilities Plan (2024 SMFP)* for the conversion of an approved or existing fixed MRI scanner in Watauga County to a mobile MRI scanner. This special need determination would allow a provider in Watauga County with an existing or approved fixed magnetic resonance imaging (MRI) scanner to apply for a Certificate of Need (CON) to convert that fixed MRI scanner to a mobile MRI scanner. As the chair of ARHS' board, I can strongly state that such an initiative would significantly impact providers' ability to flexibly provide effective care and increase accessibility for patients in our community.

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As a community leader and resident of the North Carolina "High Country," a largely rural and mountainous region of the state known for high elevation, difficult terrain, and frequent inclement weather, I am familiar with the challenges that rural healthcare providers face in providing accessible healthcare options to the larger High Country community. Often, our providers are unable to flexibly adapt their existing MRI services to their largely dispersed and geographically diverse patient populations, and applying for additional MRI need may result in duplicative services in their respective service areas. However, having the ability to convert an existing or approved fixed MRI scanner to a mobile MRI scanner will allow these providers to recommend services that are more geographically accessible for their patients. Rural communities like ours frequently and unfortunately struggle with being granted timely and equitable care, and, as the SHCC is certainly aware, North Carolina is a heavily rural state. The addition of a special need adjustment for the conversion of an approved or existing fixed MRI scanner in Watauga County to a mobile MRI scanner would improve access for patients in Watauga and surrounding counties, health equity, and overall effectiveness of care.

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Sincerely,



Jim Deal, Chair  
Appalachian Regional Healthcare System  
Board of Trustees



**HIGH COUNTRY**  
**community health**

North Carolina State Health Coordinating Council  
809 Ruggles Drive  
Raleigh, NC 27603

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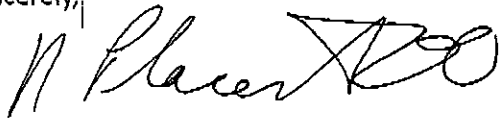
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their own, providers are unable to flexibly adapt their existing MRI services to their largely dispersed and geographically diverse patient populations. However, having the ability to convert an existing or approved fixed MRI scanner to a mobile MRI scanner will allow providers like me and my fellow physicians to recommend services that are more geographically accessible for our patients. Rural communities like ours frequently and unfortunately struggle with being granted timely and equitable care, and, as the SHCC is certainly aware, North Carolina is a heavily rural state. The addition of a special need adjustment for the conversion of an approved or existing fixed MRI scanner in Watauga County to a mobile MRI scanner would improve access for patients in Watauga and surrounding counties, health equity, and overall effectiveness of care.

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Sincerely,



**Nicholas J. Placentra, Jr., D.O.**  
**240 Hwy. 105 Ext., Suite 100**  
**Boone, NC 28607**  
**(828) 264-7311 Fax 264-7907**



## North Carolina General Assembly Senate

SENATOR RALPH HISE  
DEPUTY PRESIDENT PRO TEMPORE  
47TH DISTRICT

OFFICE: 300-A LEGISLATIVE OFFICE BUILDING  
300 N. SALISBURY STREET  
RALEIGH, NC 27603-5925  
PHONE: (919) 733-3460  
EMAIL: RALPH.HISE@NCLEG.GOV  
DISTRICT: ALLEGHANY, ASHE, AVERY, CALDWELL,  
HAYWOOD, MADISON, MITCHELL, WATAUGA  
AND YANCEY COUNTIES

### COMMITTEES:

APPROPRIATIONS/BASE BUDGET, CHAIRMAN  
REDISTRICTING AND ELECTIONS, CHAIRMAN  
FINANCE  
HEALTH CARE  
PENSIONS AND RETIREMENT AND AGING  
RULES AND OPERATIONS OF THE SENATE  
SELECT COMMITTEE ON NOMINATIONS

July 25, 2023

North Carolina State Health Coordinating Council  
809 Ruggles Drive  
Raleigh, NC 27603

Dear North Carolina State Health Coordinating Council:

I am writing to express my support for the petition filed by Appalachian Regional Healthcare System (ARHS) to create a special need adjustment in the *2024 State Medical Facilities Plan (2024 SMFP)* for the conversion of an approved or existing fixed MRI scanner in Watauga County to a mobile MRI scanner. This special need determination would allow a provider in Watauga County with an existing or approved fixed magnetic resonance imaging (MRI) scanner to apply for a Certificate of Need (CON) to convert that fixed MRI scanner to a mobile MRI scanner. As a representative of a community posed to directly benefit from this proposal, I can strongly state that such an initiative would significantly impact providers' ability to flexibly provide effective care and increase accessibility for patients in our community.

Under the current *SMFP*, providers have two options for developing MRI services: apply for a fixed MRI scanner once a need is identified in their service area or apply for a statewide mobile MRI scanner when one becomes available via an adjusted need determination. In other words, providers must either serve their patient population with a fixed MRI scanner or create a mobile MRI service and potentially compete with other mobile providers across the state. These are fairly limited options, especially for providers who are focused on serving their patient population effectively and do not want to be a statewide mobile MRI vendor. ARHS's petition proposes a third alternative: allow a provider who has demonstrated sufficient volume to support a fixed MRI the flexibility to improve geographic accessibility to the service by developing a mobile MRI instead.

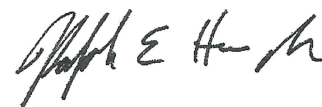
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populations, and applying for additional MRI need may result in duplicative services in their respective service areas. However, having the ability to convert an existing or approved fixed MRI scanner to a mobile MRI scanner will allow these providers to recommend services that are more geographically accessible for their patients. Rural communities like ours frequently and unfortunately struggle with being granted timely and equitable care, and, as the SHCC is certainly aware, North Carolina is a heavily rural state. The addition of a special need adjustment for the conversion of an approved or existing fixed MRI scanner in Watauga County to a mobile MRI scanner would improve access for patients in Watauga and surrounding counties, health equity, and overall effectiveness of care.

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Sincerely,

A handwritten signature in black ink, appearing to read "Ralph E. H. M.", written in a cursive style.

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Raleigh, NC 27603

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Sincerely,

A handwritten signature in black ink, appearing to read "Ray Pickett", with a long horizontal flourish extending to the right.

Representative Ray Pickett, North Carolina House of Representatives, District 93

North Carolina State Health Coordinating Council  
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Raleigh, NC 27603

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Sincerely,



Thomas Dale  
Linville NC