

March 20, 2024

North Carolina Division of Health Service Regulation  
Healthcare Planning  
2704 Mail Service Center  
Raleigh, North Carolina 27699-2704

Delivered via Email to: [DHSR.SMFP.Petitions-Comments@dhhs.nc.gov](mailto:DHSR.SMFP.Petitions-Comments@dhhs.nc.gov)

I am writing in regard to the petition filed by the Agency to request the State Health Coordinating Council (the SHCC) develop a policy allowing cancer/oncology programs/centers that do not have a linear accelerator to obtain one without regard to the need determination in the North Carolina State Medical Facilities Plan (the SMFP).

First, please note we very much appreciate the Agency's efforts to ensure our state's health planning methods and processes are serving our community's needs. However, in this particular case we believe the SHCC should consider the following relative to this petition:

- The current SMFP methodology and process appear to be working well when it comes to the evaluation of need for linear accelerators. Since the 2018 SMFP plan year, out of 100 counties in North Carolina, there have only been four petitions for machines outside the need methodology.
- The current need methodology has demonstrated additional need in two of the last four years.
- Total statewide equivalent simple treatment visits (ESTVs) have trended downward over the last three years.
- The inventory of machines in the state has steadily increased from 126 in 2018 to 132 in 2024. During this period, the excess supply of machines has also remained flat at approximately 39 machines, further demonstrating adequate access to this technology across the state.

Attachment A included with this letter contains the data we compiled, reviewed and utilized in developing our response to this petition.

Lastly, we request the SHCC proceed with caution relative to this petition as modification to the current need methodology and process may have unintended consequences. We do not believe

the SHCC should adopt this petition. Instead, it may be appropriate to develop a study group to consider this situation further.

We appreciate the opportunity to provide these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "F. Del Murphy, Jr." with a stylized, cursive script.

F. Del Murphy, Jr.  
Vice President / Chief Strategy Officer

Enclosure – Attachment A

**Attachment A**  
**Trends in NC Linear Accelerator Need**

	SMFP year:		2018		2019		2020		2021		2022		2023		2024		Compound Annual Growth Rates '17 to '23
	Data year:		2015 to 2016		2016 to 2017		2017 to 2018		2018 to 2019		2019 to 2020		2020 to 2021		2021 to 2022		
	Population year:		2017		2018		2019		2020		2021		2022		2023		
North Carolina population	10,264,353	10,388,837	10,524,548	10,630,691	10,658,717	10,631,667	10,794,463										0.84%
Accelerators (machines)	126	126	130	128	129	131	132										
Population within service area per machine	81,463	82,451	80,958	83,052	82,626	81,158	81,776										0.06%
Equivalent simple treatment visits (ESTV procedures)	583,352	603,450	617,310	629,741	643,289	631,756	625,148										1.16%
Procedures per machine	4,630	4,789	4,749		4,987	4,823	4,736										0.38%
(ESTV procedures / 6,750) - # of machines	(39.58)	(36.60)	(38.55)	(34.71)	(33.70)	(37.41)	(39.39)										
<b>Need per SMFP need methodology:</b>																	
	-	-	-	1.0	1.0	-	-	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	
				Service Area 19	Service Area 7	Service Area 19	Service Area 18	Service Area 19	Service Area 19	Service Area 19	Service Area 19	Service Area 19	Service Area 19	Service Area 19	Service Area 19	Service Area 19	
				New Hanover	Mecklenburg / Union	New Hanover	Robeson	New Hanover	New Hanover	New Hanover	New Hanover	New Hanover	New Hanover	New Hanover	New Hanover	New Hanover	
<b>Need per a petition:</b>	-	1.0	-	-	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	
		Service Area 18			Service Area 24	Service Area 20	Service Area 18	Service Area 24	Service Area 24	Service Area 24	Service Area 24	Service Area 24	Service Area 24	Service Area 24	Service Area 24	Service Area 17	
		Robeson			Carteret	Wake	Robeson	Carteret	Carteret	Carteret	Carteret	Carteret	Carteret	Carteret	Carteret	Moore	

Source: Annual North Carolina State Medical Facilities Plans