



NC DEPARTMENT OF  
**HEALTH AND  
HUMAN SERVICES**

**JOSH STEIN** • Governor

**DEVPUTTA SANGVAI** • Secretary

**MARK PAYNE** • Director, Division of Health Service Regulation

**VIA EMAIL ONLY**

March 27, 2025

Ms. Tina Hair Hinshaw

[Tina.hinshaw@akumin.com](mailto:Tina.hinshaw@akumin.com)

**Exempt from Review – Replacement Equipment**

**Record #:** 4735

**Date of Request:** March 13, 2025

**Business Name:** Alliance Healthcare Services, Inc.

**Business #:** 60

**Project Description:** Replace a mobile MRI scanner

**County:** Multiple

Dear Ms. Hinshaw:

The Healthcare Planning and Certificate of Need Section, Division of Health Service Regulation (Agency), determined that the above referenced project is exempt from certificate of need review in accordance with G.S. 131E-184(a)(7). Therefore, you may proceed to replace without a certificate of need the mobile MRI scanner ESP 23 with mobile MRI scanner ESP 37. This determination is based on your representations that mobile MRI scanner ESP 23 will be sold or otherwise disposed of and will not be used again in the State without first obtaining a certificate of need if one is required.

It should be noted that the Agency's position is based solely on the facts represented by you and that any change in facts as represented would require further consideration by this office and a separate determination. If you have any questions concerning this matter, please feel free to contact this office.

Sincerely,

Tanya M. Saporito  
Project Analyst

Micheala Mitchell  
Chief

**NC DEPARTMENT OF HEALTH AND HUMAN SERVICES • DIVISION OF HEALTH SERVICE REGULATION**

**HEALTHCARE PLANNING AND CERTIFICATE OF NEED SECTION**

LOCATION: 809 Ruggles Drive, Edgerton Building, Raleigh, NC 27603

MAILING ADDRESS: 809 Ruggles Drive, 2704 Mail Service Center, Raleigh, NC 27699-2704

<https://info.ncdhhs.gov/dhsr/> • TEL: 919-855-3873

AN EQUAL OPPORTUNITY / AFFIRMATIVE ACTION EMPLOYER



March 13, 2025

Mr. Mike McKillip, CON Analyst  
Mr. Greg Yakaboski, CON Analyst  
Ms. Micheala Mitchell, Chief  
Health Planning and Certificate of Need Section  
2704 Mail Service Center  
Raleigh, NC 27699-2704

Business Name: Alliance Health Services  
Business Number: 60  
CON#: F-7001-04  
ESP 37 Serial # 1M9A3A820BH022802  
ESP 23 Serial # 1S9FA482181183250

RE: Alliance Healthcare Services - Written Notice for Exemption from CON Review for the **Permanent Replacement of MRI Scanner ESP 23 (CON# F-7001-04) by ESP 37.**

Dear Mr. McKillip and Ms. Mitchell:

I am writing regarding the urgent need to permanently replace MRI scanner ESP23 due to significant maintenance needs. Please accept this notice of exemption to permanently replace ESP23 with ESP37 which is an existing mobile MRI scanner owned by Alliance and will be utilized as the permanent replacement MRI for this ESP 23. ESP 23 has been removed from use in NC.

CON# F-7001-04 was fulfilled by Alliance MRI ESP 23 which is a scanner that was properly reported in the 2024 NC MRI Equipment Inventory. ESP 37 (replacing ESP 23) will be serving the following host sites:

Raleigh Radiology Clayton  
11618 U.S. 70 Business  
Clayton, NC 27520

Raleigh Radiology Holly Springs  
1060 S Main Street  
Holly Springs, NC 27540

Southern Imaging Wilmington  
1602 Physicians Drive  
Wilmington, NC 28401

New Hanover Regional-Brunswick  
1333 South Dickinson Dr  
Leland, NC 28451

Pender Memorial Hospital-Burgaw  
507 East Fremont Street  
Burgaw, NC 28425

This letter provides justification and written notice regarding the replacement equipment in accordance with NCGS 131 E-184. Alliance Healthcare Services also provides documentation that the equipment conforms to



the Certificate of Need Laws and Administrative rules: GS 131E-184(a) (7) Exemptions from review to provide replacement equipment 10A NCAC 14C.0303 Replacement Equipment Administrative Rules.

#### Overview

This existing MRI scanner requires permanent replacement due to:

- Maintenance issues
- Service to the existing host site is disrupted if replacement MRI is not provided

#### Compliance Documentation

Compliance with G.S. 131E-176 (22a) Replacement Equipment Definition is evident because the temporary replacement scanner has a fair market value of \$300,00 which is far less than the \$2,000,000 threshold. The replacement MRI equipment will be used for the same diagnostic purposes as the existing equipment. In addition, Alliance is providing written notice to the Department in accordance with G.S. 131E-184 (a) (7) Exemption from Review to provide replacement equipment.

Applicability and Conformance with Administrative Rule 10A NCAC 14C.0303 Replacement Equipment  
Alliance Healthcare Services plans to use an existing mobile MRI as a permanent replacement. No equipment will be purchased. The temporary replacement equipment conforms to the rules as follows:

#### 10A NCAC 14C .0303 REPLACEMENT EQUIPMENT

(a) This Rule defines the terms used in the definition of "replacement equipment" set forth in G.S. 131E-176(22a).

Alliance Healthcare Services has reviewed this rule definition.

(b) "Currently in use" means that the equipment to be replaced has been used by the person requesting the exemption at least 10 times to provide a health service during the 12 months prior to the date the written notice required by G.S. 131E-184(a) is submitted to the CON Section.

Alliance Healthcare Services confirms that Sym43 meets the definition of "currently in use" because the MRI scanner provides service during the previous 12 months prior to the date of this written notice.

(c) Replacement equipment is not "comparable" if: (1) the replacement equipment to be acquired is capable of providing a health service that the equipment to be replaced cannot provide; or (2) the equipment to be replaced was acquired less than 12 months prior to the date the written notice required by G.S. 131E-184(a) is submitted to the CON Section and it was refurbished or reconditioned when it was acquired by the person requesting the exemption.

The replacement MRI scanner is comparable to the equipment being replaced because the permanent replacement equipment will be used to acquire the same types of MRI images and data. Alliance Healthcare Services certifies that the replacement mobile MRI equipment will be used for the same diagnostic purposes as the existing MRI unit.

The existing equipment, ESP 23, will be permanently replaced by ESP 37. Thank you for your review and consideration of this information. Please call me at 805.325.3078 if you have any questions.

Sincerely,

Tina Hair Hinshaw, MBA  
RVP, Mobile Operations Southeast Region  
805.325.3078 [tina.hinshaw@akumin.com](mailto:tina.hinshaw@akumin.com)

CC: Rodney Skelding and Lisa Barrera, Managers of Operations Akumin

**From:** [Mckillip, Mike](#)  
**To:** [Stancil, Tiffany C](#)  
**Subject:** FW: [External] NCCON-ESP37 Permanent Replacement of ESP23  
**Date:** Friday, March 14, 2025 9:53:27 AM  
**Attachments:** [AR\\_NCCON\\_ESP37\\_Permanent Replacement of ESP23\\_03132025.pdf](#)

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Hi Tiffany,

Since 3 out of the 5 host sites are in Tanya's area, let's declare her the winner and give this replacement equipment exemption request to her. Thanks.

Mike

**Michael McKillip**

Team Leader, Certificate of Need  
Division of Health Service Regulation, Healthcare Planning and Certificate of Need  
[NC Department of Health and Human Services](#)

Office: 919-855-3877 (I am in the office on Wednesday and Friday, and can best be reached by email on Monday, Tuesday and Thursday.)  
[mike.mckillip@dhhs.nc.gov](mailto:mike.mckillip@dhhs.nc.gov)

809 Ruggles Drive, Edgerton  
2704 Mail Service Center  
Raleigh, NC 27699

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**From:** Tina Hinshaw <tina.hinshaw@akumin.com>  
**Sent:** Thursday, March 13, 2025 2:51 PM  
**To:** Yakaboski, Greg <greg.yakaboski@dhhs.nc.gov>; Mitchell, Micheala L <Micheala.Mitchell@dhhs.nc.gov>; Mckillip, Mike <mike.mckillip@dhhs.nc.gov>

**Cc:** Tina Hinshaw <tina.hinshaw@akumin.com>; Rodney Skelding <rodney.skelding@akumin.com>; Lisa Barrera <lisa.barrera@akumin.com>

**Subject:** [External] NCCON-ESP37 Permanent Replacement of ESP23

**CAUTION:** External email. Do not click links or open attachments unless verified. Report suspicious emails with the Report Message button located on your Outlook menu bar on the Home tab.

Please see attached documentation for permanent replacement of MRI unit ESP23 due to maintenance issues. The replacement unit is ESP37.

Please call or email with any questions or concerns.

Regards,

Tina

**Tina Hinshaw**  
Vice President, Regional

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[tina.hinshaw@akumin.com](mailto:tina.hinshaw@akumin.com)

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