



**Comment on Petitions filed by Novant Health and Randolph Hospital
Regarding PET Equipment**

Proposed 2015 State Medical Facilities Plan

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A handwritten signature in black ink that reads "Ed Rush".

Via email to: Nadine Pfeiffer
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Thank you for the opportunity to comment on the petitions filed by Novant Health and Randolph Hospital regarding mobile PET services.

Iredell Memorial Hospital has one unit of fixed PET equipment. Changes in the reimbursement system along with delayed approval of PET uses for non-cancer applications have resulted in lower than expected use of the equipment. Iredell Memorial continues to believe that PET scanning is an important diagnostic tool and that the use of this technology allows us to provide more comprehensive cancer care by advancing our understanding of the underlying causes of disease and improving detection and treatment planning.

To provide maximum economic flexibility, Iredell Memorial would be interested in having a future option to convert the unit to a mobile unit when we replace it. We would favor this option for any hospital that has an under-used unit.

We would not favor restricting the option to a one-year window. That would work against the Value Principle in the Plan and favor larger hospitals that have equipment ready to replace today over those with more recent purchases. Replacement accelerated by a state rule would not be prudent or cost effective. A three- to four-year window would respect the depreciation schedule better.

We also ask that any changes regarding mobile services restrict the new mobile locations to unserved communities.

Thank you for taking time to consider the needs of people served by the mid-sized hospitals in your deliberations.